



October 13, 2015

Chair Felicia Marcus and Board Members
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Sent via electronic mail to: commentletters@waterboards.ca.gov

RE: Comment Letter – Storm Water Resource Plan and Proposition 1 Storm Water Funding Guidelines

Dear Chair Marcus and Board Members:

TreePeople respectfully submits the following comments on the California State Water Resources Control Board’s draft guidelines for both the “Storm Water Resource Plan” as well as the “Proposition 1 Storm Water Grant Program”. We appreciate the thought that has gone into these documents and the opportunity to provide comments.

For decades, TreePeople’s work has focused on securing a local water supply in the Los Angeles region. Our focus in creating and implementing water capture and infiltration projects at the school, park, street and home levels – as well as creating policies to support such efforts—is aimed at securing a water and climate-resilient Los Angeles. In addition, our experience in creating a cost-benefit modeling tool to evaluate the multiple benefits of green infrastructure projects, our focus on multi-agency collaboration, and key role in creating the LA Department of Water and Power’s Stormwater Capture Master Plan provides a unique lens for our comments.

Comments on the Storm Water Resource Plan Guidelines

Section C focuses on quantitative methods for identifying and prioritizing storm water and dry weather runoff capture projects. We believe there is a solid foundation in the guidelines; however we have the following concerns and comments:

- 1) This metrics-based approach is to lead to an “integrated evaluation and analysis of multiple benefits...”. While we agree with many of the metrics set out in Table 3 (with a few exceptions noted below), the integration component seems to focus on providing information on various components rather than an integrated analysis. It is unclear what is meant by “integrated evaluation” and we recommend the guidelines include more clarity on this topic.

Multiple project benefits will be more meaningfully examined with the use of a tool that provides a comprehensive, integrated analysis and as such we recommend the use of such a tool to aid project managers and evaluators. While we are not suggesting that the State Water

Board require use of any specific tool, an example would be TreePeople’s LOGIC Model (previously T.R.E.E.S. model) that TreePeople has successfully used to estimate costs and benefits of multi-benefit projects. The tool breaks down benefits into sectors (such as benefits to water quality, water supply, etc.), and then monetizes the amount of the various benefits. This allows for agencies or others who might benefit from these multi-benefit, green infrastructure projects to see the return on investment from funding or co-funding such a project. We have attached a fact sheet on this model that we are currently in the midst of updating—however, other types of tools or models might be useful for this purpose as well.

- 2) We suggest the following modifications to the Benefits Matrix (Table 3):
 - a. Under “Water Supply Reliability” – we recommend a metric that can address the reduced risk of a disrupted imported water supply (such as from an earthquake or other disaster).
 - b. We recommend that “Increased Urban Green Space” be listed under only one Benefit Category as it is currently used as an example in two categories.

- 3) Section VI(C)(2)(b) – Storm Water Capture and Use Projects Analysis
 - a. As done in the LADWP Stormwater Capture Master Plan, we recommend that an opportunity analysis of how much storm water could be captured in the watershed by both centralized and distributed best management practices be done during preliminary stages.
 - b. It would then be helpful to provide guidance on the types of best management practices (BMPs) used to capture water, as well as water capture volume scenarios for those BMPs. Additionally, it would be helpful to tie the BMPs to specific types of parcels (e.g. green street, residential, regional, other).
 - c. This section could also benefit from guidance on strategies for determining implementation rates for various types of parcels, and the reasoning behind those rates.

- 4) Prioritization Guidance – we recommend the following modifications to Table 4:
 - a. While we are a community-based organization and work to help the community in all we do, the minimum requirements to prioritize a project allow for the two MAIN BENEFITS to be in one category. This could lead to prioritizing a project even if it only has the two community benefits. We recommend that if a community benefit is one of the MAIN BENEFITS, the other needs to come from a different category.
 - b. We also recommend that a reduction in the urban heat island effect should be listed as an ADDITIONAL BENEFIT as it also meets the intention of this law.

- 5) Plan Implementation – To implement most plans, it will take more than actions, projects and studies. We recommend that any Plan should identify policies, laws and incentives needed to allow the Plan to be successful.

- 6) The guidelines often reference “Watershed Based Outcomes” – we recommend these be defined.


Comments on the Proposition 1 Storm Water Grant Program Guidelines

Our comments focus on the Program Preferences as well as the Implementation Proposal application and scoring criteria.

- 1) Program Preferences: While we appreciate that this list almost mirrors the list of example benefits in the Storm Water Resource Plan Guidelines, now that multiple benefits are to be scored based on this list, some modifications are needed.
- 2) For example, why is “Increased Urban Green Space” noted twice? Also, a few of the benefits listed overlap in meaning. This list, which has a nexus to the scoring, should be reviewed, consolidated and clarified.
- 3) We would appreciate clarification as to whether operation and management funding, while not bond fundable, might be considered as part of the funding match.
- 4) Lastly, given the emphasis put on the multi-benefit aspects of projects, the fact that only one-fifth of the scoring (20 points) goes to multiple benefits seems low (note there seems to be a discrepancy in multiple benefit criteria section--header says 20 points, but scoring says up to 25. Bumping it up to 25 will take total points to 105).

We greatly appreciate the opportunity to comment on both of these draft guidelines, and look forward to working with the State Water Board to move this process forward.

Sincerely,



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Senior Director of Policy
TreePeople