

# Equity in Stormwater Investments:

Measuring Community Engagement and Disadvantaged Community Benefits  
for Equitable Impact in the Safe Clean Water Program





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## Authorship

This report was produced by the UCLA Luskin Center for Innovation and Stantec, and was authored by the following researchers:

**Gregory Pierce**, co-director, UCLA Luskin Center for Innovation

**Jon Christensen**, adjunct assistant professor, UCLA Institute of the Environment and Sustainability

**Mike Antos**, senior integrated water management specialist, Stantec

**Peter Roquemore**, project manager, UCLA Luskin Center for Innovation

**Hayat Rasul**, graduate student researcher, UCLA Luskin Center for Innovation

**Estefany Garcia**, graduate student researcher, UCLA Luskin Center for Innovation

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## For More Information

Contact Gregory Pierce at [gspierce@ucla.edu](mailto:gspierce@ucla.edu) or Jon Christensen at [jonchristensen@ioes.ucla.edu](mailto:jonchristensen@ioes.ucla.edu).

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# EXECUTIVE SUMMARY

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**The Safe, Clean Water Program (SCWP)** reflects the will of the voters of Los Angeles County, who approved Measure W in 2018 by close to 70%. The ballot measure established a perpetual parcel tax “to fund projects and programs to increase stormwater capture and reduce stormwater and urban runoff pollution” in Los Angeles County “to increase water supply, improve water quality, and, where appropriate, provide community enhancements such as the greening of schools, parks, and wetlands, and increased public access to rivers, lakes, and streams.”<sup>1,2</sup>

In an ordinance implementing the Safe Clean Water Program, the county Board of Supervisors included provisions to prioritize equity in implementation and affirmed an intention to address inequity in infrastructure in August 2021.<sup>3,4</sup> Those provisions gave rise to this report, which provides advice drawn from research and stakeholder engagement to the Los Angeles County Flood Control District (LACFCD) for measuring community engagement and Disadvantaged Community Benefits to better achieve the equitable impact sought by the SCWP. As part of a broader SCWP Metrics and Monitoring Study (MMS) commissioned by the LACFCD, we were charged with conducting research, consulting with stakeholders, and giving advice to the SCWP for metrics to measure community engagement and Disadvantaged Community Benefits.

The parcel tax now generates approximately \$285 million per year. Those funds are allocated to:

- ▶ A Municipal Program, through which municipalities receive 40% of the funds proportional to the revenue generated in each municipality;
- ▶ A Regional Program, which receives 50% of the funds for three programs (Infrastructure, Technical Resources, and Scientific Studies);
- ▶ And a Flood Control District Program, which receives 10% of the funds for administration and oversight of the SCWP, 20% of which in turn is dedicated to public education programs, local workforce job training, and education and curriculum development programs in schools.<sup>5</sup>

Equity is primarily prioritized in the SCWP under a provision that the Infrastructure Program “shall be allocated such that funding for Projects that provide a [Disadvantaged Community] Benefit is not less than one hundred ten percent (110%) of the ratio of the [Disadvantaged Community] population to the total population in each Watershed Area” of the District.<sup>6</sup> The question of how to measure that “Disadvantaged Community Benefit” is at the heart of this report, as is the question of how to strengthen equity outcomes by refining the definition of a “disadvantaged community,” which the SCWP currently defines as “a census block group that has an annual median household

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<sup>1</sup> 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](#)).

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

<sup>3</sup> 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](#))

<sup>4</sup> Motion by Supervisors Holly J. Mitchell and Janice Hahn, adopted August 10, 2021: [Motion\\_2004 \(lacounty.gov\)](#)

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

<sup>6</sup> Safe Clean Water Program (2022). [Interim Guidance: Implementing Disadvantaged Community Policies in the Regional Program](#). Page 48. May 2022.

income of less than eighty percent (80%) of the Statewide annual median household income (as defined in Water Code section 79505.5).”

We also examine other aspects of the SCWP necessary for achieving the required Disadvantaged Community Benefits and equitable implementation of the SCWP more broadly. Community engagement is one essential key to equity, so it, too, is featured in this report.

A few words about how we define metrics for equitable implementation:

To achieve the outcomes and impact approved by voters, who agreed to invest their tax dollars in the SCWP, metrics are meant to be decision support tools for planning (What should be done?) and evaluating (How is it going?). Metrics are used throughout the SCWP for developing proposals, planning and implementing projects, making funding decisions, and evaluating and adapting as programs evolve. The SCWP prioritizes adaptive management; i.e., adjusting as lessons are learned. The LACFCD and stakeholders recognize that the SCWP needs new or more refined metrics that decision-makers can use at several levels: the individual project, the individual watershed area, and the entire countywide program.

We discuss “process” and “outcome” metrics. Process metrics evaluate how things are going, guided by the question: Are the processes the SCWP is using driving achievement toward intended outcomes? Outcome metrics evaluate what impacts were achieved by the work undertaken and how closely those impacts align with expected results. Measuring processes as well as outcomes — while keeping in mind that processes also generate data that can be used as metrics — turns out to be very important, especially for community engagement and achieving equitable benefits for disadvantaged communities.

This leads directly to two top-line perspectives that frame the detailed advice we offer in this report:

**1. Members of a disadvantaged community must agree that they will benefit from a project for project proponents to claim a Disadvantaged Community Benefit.**

**2. Project proponents in disadvantaged communities should be required, and be provided guidance, technical assistance, and financial assistance, to conduct robust community engagement throughout the Safe, Clean Water Program and especially when claiming a Disadvantaged Community Benefit.**

We highlight these two top-line recommendations because we have concluded, based on our research and stakeholder consultations, that equity demands that members of disadvantaged communities recognize and want the benefits that projects claim to deliver. The only way to know if this is true is through robust community engagement. Across many different areas of policy, Los Angeles County has recognized that disadvantaged communities, and especially severely disadvantaged communities, systemically have unequal access to opportunities because of historical discrimination, including structural racism, economic underinvestment, and often active disinvestment by the private and public sectors.<sup>7</sup>

Correcting the inequities of the past and present requires all four pillars of environmental justice: recognition, procedural, capacity, and distributional (Schlosberg, 2007). Recognition justice requires recognizing and respecting the perspectives of members of disadvantaged communities. Procedural justice requires ensuring procedures are inclusive and fair. Capacity justice means providing support for disadvantaged communities to ensure that they can participate in SCWP

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<sup>7</sup> See the revised motion by Supervisor Mark Ridley-Thomas in the County of Los Angeles County Board of Supervisors [Infrastructure Inequity Motion](#) “Establishing an Antiracist Los Angeles County Policy Agenda,” July 21, 2020.

# Good community engagement is **a two-way street.**

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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

parks, habitat or wetlands; improved public access to waterways; enhanced or new recreational opportunities; and greening of schools. A Community Investment Benefit may also include a benefit to the community derived from a Project or Program that improves public health by reducing heat island effect, increasing shade, or planting trees and other vegetation that increase carbon reduction/sequestration, and improve air quality.”<sup>8</sup>

Not mentioned here are potential community investment harms, principal among them infrastructure investments that inconvenience, fragment, or divide communities, or lead to gentrification that displaces the very communities our policies are meant to benefit. Displacement avoidance strategies are listed as potential Community Investment Benefits in the SCWP.<sup>9</sup> We understand that the LACFCD is waiting on Los Angeles County to develop countywide displacement avoidance strategies that can be integrated into the SCWP. We believe such strategies are crucial to ensure that communities thrive in place alongside new green infrastructure investments and that the LACFCD should not wait, but instead actively participate in pushing for a countywide policy. This advice is not amenable to metrics at this point, so we have not included it in our detailed advice, but it is important to track for equitable implementation to succeed, so we have included it here.<sup>10</sup>

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<sup>8</sup> 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](#))

<sup>9</sup> Within the Regional Program, the [2019 Feasibility Study Guidelines](#) describe the importance of a displacement avoidance plan for projects located in disadvantaged communities.

<sup>10</sup> See the Community Stabilization Toolkit appendix to the Lower Los Angeles River Master Plan. See also “[Greening Without Gentrification: Learning from Parks-Related Anti-Displacement Strategies Nationwide](#),” by Alessandro Rigolon and Jon Christensen, 2019.

One additional important point before we move on to our specific, detailed advice about metrics:

Right now, the scoring criteria for projects are the most prominent, public-facing metrics system in the SCWP. We understand the importance of creating additional metrics for the SCWP and the projects that it funds. The scoring of a project using the scoring system cannot provide all the information needed by project proponents to design good projects, for the Watershed Area Steering Committees (WASCs) to make good funding recommendations, and for the public to evaluate the effectiveness of the SCWP. The scoring system itself — distinct from any particular project's earned score — demonstrates program priorities in how it allocates points to different project elements and benefits and thus encourages project developers to include or prioritize certain outputs and outcomes of projects. Additional metrics will need to be clear, compelling, and purpose-built to be embraced by users alongside the scoring system. But we also recommend that during the next biennial review of the SCWP that the LACFCD evaluate potential benefits from changes in the scoring criteria, as well, to strengthen equity and engagement.

While our focus is on community engagement and Disadvantaged Community Benefits in the SCWP, we have, out of necessity, found ourselves needing to broaden our view as these two parts of the SCWP are connected to all the other parts of the program. Nonetheless, equity has been our focus and guiding principle. And this report seeks

to connect the dots in this somewhat complicated picture and advise on actionable steps that can be taken and metrics that can be used to inform decision-making processes to ensure equitable implementation of the SCWP, to evaluate outcomes and impact, and learn and improve throughout the long life of the program.

We understand that the advice provided by this report might suggest changes to the administrative structure of the SCWP. We do not address such changes in this report, but leave those next steps to the LACFCD and, to the extent appropriate, the SCWP MMS Stakeholder Advisory Committee and Regional Oversight Committee.

The rest of this report is structured as follows:

- ▶ First, we provide detailed advice and suggest actionable next steps for the SCWP to consider.
- ▶ Next, we include a review of the research that led to our advice.
- ▶ We review the SCWP's provisions for community engagement and equitable implementation.
- ▶ Then we provide an analysis of projects approved in the first two funding cycles of the SCWP through an equity lens.
- ▶ A review of pertinent literature follows.
- ▶ We summarize the stakeholder engagement process that informed our research and this report.
- ▶ This is followed by a brief conclusion, references, and appendices.

# ADVICE AND SUGGESTIONS FOR NEXT STEPS

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

## Tools and Metrics for Measuring Community Needs, Strengths, and Preferences

Create a process to assess and report community needs, strengths, and preferences on an ongoing basis. Use the data gathered in this assessment in metrics for measuring community engagement, as well as for Community Investment Benefits and Disadvantaged Community Benefits. Combine this with existing risk and vulnerability assessments and additional assessments underway to create and maintain a living, interactive risk and vulnerability assessment map that can be used as data to document community needs and benefits from projects that address those needs.

In the region served by the SCWP, water quality needs as well as most parameters of water supply potential and management systems are relatively well defined by regulatory processes. Additional work in this area is underway within the LACFCD and the broader MMS.

Communities' stated needs for Investment Benefits, however, are unevenly documented across the communities served by the SCWP.

The L.A. County Department of Parks and Recreation's Park Needs Assessment provides data about park needs throughout the county. And the county's new Climate Vulnerability Assessment provides data about climate hazards, infrastructure,

and social vulnerability to climate change.

Several other categories of potential Community Investment Benefits are under study. The LACFCD is studying flood risks through a local drainage needs assessment program, and an ongoing effort at UC Irvine is developing an assessment tool that combines flood risk and social vulnerability data to predict and measure potential flood risk. This potentially could also be used to predict and measure flood management benefits provided by SCWP projects.

The data from these assessments should be combined with disadvantaged community status in a mapping tool that can be used by project proponents and others in community engagement to identify Disadvantaged Community Benefits that could be provided by SCWP projects. This should be a regularly updated, interactive mapping tool as these assessments will need to be updated periodically.

The SCWP should also develop an ongoing, interactive survey tool that can be used by watershed coordinators to gather information from community members about their needs that could be met through Community Investment Benefits. This survey could draw on techniques used in the WaterTalks program led by TreePeople on behalf of the Greater Los Angeles Area Regional Water Management Group.<sup>10</sup> This program used multiple techniques to gather information about community preferences, strengths, and needs in disadvantaged communities in Los Angeles County. It can be used in many different settings, including focus groups, and data collected by

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<sup>10</sup> 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 outcomes. Potential metrics could include:

- ▶ Have project proponents used these tools to identify the needs, strengths, and preferences of the communities from which the project would benefit?
- ▶ Will the project reduce risk and vulnerability identified in the needs assessment mapping tool?
- ▶ How many different risks or vulnerabilities would be mitigated, to what extent, and affecting how many people?
- ▶ Which of the needs and preferences identified by the communities would benefit from the project, where do they rank in priority for the communities, and how many of those needs and preferences would be met?

These metrics could then be used to evaluate outcomes along with other specific, quantifiable metrics that the broader MMS is identifying for measuring Community Investment Benefits, such

as tree canopy and park and open space acreage. These metrics could also be used throughout the project cycle from design through planning, community engagement, implementation, and evaluation and learning.

The broader MMS could consider a metric or metrics that can be rolled up to the watershed area and program levels that measure the use of these two data sets — community vulnerability and community needs, strengths, and preferences — in project development. The metrics could be as simple as the percentage of projects and investments that demonstrably met community needs and preferences and the percentage of projects and investments that reduced community vulnerability.

**Next steps:** The LACFCD should develop the assessment tools and metrics recommended here to support measurement, planning, and evaluation with new metrics.

## Community Engagement

Drawing from the 2022 Interim Guidance,<sup>11</sup> SCWP should require the “Good” standard for community engagement in projects and that project proponents use data from the needs assessment tools described in recommendation 1 above in their proposals. It should pre-qualify community-based organizations (CBOs) and nonprofit organizations (NPOs) that can be employed or deployed to conduct community engagement. It should create a fund to support “Better” and “Best” pre-proposal community engagement in disadvantaged communities using qualified CBOs and NPOs. Finally, it should engage with other agencies and in countrywide efforts such as WHAM or InfrastructureLA to create a pooled fund for pre-proposal community engagement to identify opportunities for multibenefit projects in disadvantaged communities.

<sup>11</sup> More detail on the “Good, Better, or Best” model for community engagement can be found on page 9 of the 2022 SCWP Regional Program [Interim Guidance: Strengthening Community Engagement and Support](#).

# CBOs and NPOs are best positioned to provide community engagement in the SCWP, **particularly in disadvantaged communities.**

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The LACFCD has published interim guidance that establishes benchmarks for “Good,” “Better,” and “Best” community engagement based on best practices in the field. We suggest considering changes to that guidance, but the real key is implementation of the guidance and incentivizing “Better” and “Best” community engagement from pre-proposal project identification through planning, funding, and implementation.

“Good,” as defined in the interim and future guidance, should be the floor for community engagement. Policies and project approval processes in the SCWP should be adapted to ensure no project moves forward without “Good” community engagement paid for by project proponents. “Better” and “Best” benchmarks for community engagement should clearly be established as metrics for projects so that these metrics can be taken into account throughout the SCWP, particularly in disadvantaged communities, by project proponents, the Scoring Committee that verifies project eligibility, Watershed Area Steering Committees that approve projects, and community members. When scoring criteria for projects are next reviewed, the LACFCD should consider whether changes in the criteria could also incentivize “Better” and “Best” community engagement.

We advise adding a requirement for “Good” community engagement that project proponents clearly take into account data from the two needs

assessment tools we suggested for measuring community needs. For “Better” and “Best” community engagement, project proponents should be required to demonstrate that they have actively used that data to generate constructive conversations with community members in their education and engagement efforts and to listen actively to the strengths, needs, and preferences of the community. We also recommend that authentic pre-proposal community engagement, to identify and discuss community priorities for multibenefit projects, be included as a benchmark and metric for “Best” community engagement.

CBOs and NPOs with a proven track record of effective use of best practices in community engagement on infrastructure-related issues — including parks, water, and transportation — and existing good relationships in communities are best positioned to provide community engagement in the SCWP, particularly in disadvantaged communities. We recommend that the LACFCD prequalify a bench of well-trained CBOs and NPOs that project proponents could contract to conduct community engagement. If possible, this bench should be established at the county level so that it could be used across agencies, including the Department of Public Works, Metro, and the Regional Parks and Open Space District (RPOSD). The Department of Public Health could play a role in qualifying this bench because it has deep experience in connecting infrastructure investments and community health and well-being

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. Ideally, to avoid engagement fatigue, governments should strive for continuous coordinated engagement of their communities in planning, especially for publicly funded projects meant to benefit their communities, and particular projects could tap into this engagement at appropriate times and scales during their planning and implementation processes.

We recognize that engagement will vary at different stages of a project, but there should be appropriate engagement at all stages. Identifying community strengths, needs, and preferences requires community engagement before project proposals are developed, not just engagement during proposal development or commenting on proposals. Other than the SCWP watershed coordinators, there is currently no mechanism available for this kind of sustained community engagement, which is best conducted in disadvantaged communities with qualified CBOs and NGOs.

We recommend that the LACFCD create within the District Program, perhaps within the Education Program, a means of providing financial or technical assistance for this kind of community engagement in disadvantaged communities because they often have a lower capacity than more wealthy communities for project identification, development, and planning. We also recommend that the LACFCD collaborate with RPOSD, Metro, the Department of Public Works, and other county or regional institutions to create a pooled fund to support pre-proposal community engagement and education to identify

potential multibenefit projects in disadvantaged communities and high- and very high-need areas identified by the Los Angeles County Parks Needs Assessment.

A watershed area or programwide metric should be created that draws from the “Good,” “Better,” and “Best” community engagement undertaken by project proponents and that expresses the extent to which the SCWP is achieving its goals of robust community engagement. This could be as simple as what percentage of projects and investments used “Good,” “Better,” and “Best” community engagement.

**Next steps:** The LACFCD should establish requirements based on the existing community engagement guidance for future calls-for-projects. Further, LACFCD should develop the administrative structures necessary to prequalify community engagement technical assistance providers and discuss the potential for a pooled fund with other county agencies.

## Disadvantaged Community Benefits

In line with current guidance and based on data, disadvantaged communities should be allowed to self-identify their boundaries and their understanding of which projects will provide benefits to their communities. For a project to be credited with providing a Disadvantaged Community Benefit — whether through Water Quality, Water Supply, and/or Community Investment benefits — to any community, that community must formally and specifically agree. Disadvantaged Community Benefits should be counted toward the 110% benchmark as long as they are recognized by disadvantaged communities.

The geographic extent of disadvantaged communities should be defined by communities in appropriate ways at appropriate scales using data. This can continue to include the standard definition



# Are a project's benefits **based on data about needs?** And are they **recognized by the community?**

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based on census block groups where the median household income in an area is less than 80% of the statewide median household income; by census places using the same criteria; or by using the WaterTalks or CalEnviroScreen categorizations of pollution burden and disadvantaged communities.<sup>12,13</sup>

For a Disadvantaged Community Benefit to be recognized and counted, project proponents must document that members of the benefiting community (as defined by data in one of the ways suggested above) have indicated in a formally recognized fashion that the community wants the project and needs the benefits. The benefits must be specific, enumerated, explained, and supported by data from the needs assessments suggested in recommendation 1. By “formally recognized fashion,” we mean through processes identified in the SCWP and guidance on community engagement. Ideally, this should include a public process overseen by a publicly accountable agency or government, or community engagement

by qualified CBOs and NPOs with proven track records of empowering community voice. Evidence of concurrence could include a governing body's resolution, letters from CBOs, surveys, meetings where concurrence was recorded, signatures on letters or petitions, as well as a lack of evident opposition. Many of these are specified in the SCWP's 2022 Interim Guidance on community engagement. We recommend that the existing guidance be used to support a requirement for concurrence.

Water Quality, Water Supply, and Community Investment benefits can count as Disadvantaged Community Benefits as long as they are recognized by the community. Achieving authentic concurrence entails education and community engagement so that communities understand and recognize the benefits.

To calculate the 110% Disadvantaged Community Benefit, the total investment in a project should be counted if the claim is supported by the engagement process outlined above and the benefits are specific, enumerated, and explained. We recognize that investment is an input or process metric rather than an outcome or impact metric.

In evaluating outcomes and impact, the Water Quality, Water Supply, and Community Investment benefits of projects also should be considered Disadvantaged Community Benefits if they are supported by the process outlined above. The MMS could develop those specific metrics. This data should be tied to the disadvantaged community where benefits are claimed in a spatially explicit fashion for evaluation, accountability, and learning over time. The SCWP should also commission periodic evaluations of

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<sup>12</sup> [WaterTalks](#) uses specific community boundaries sourced from the Disadvantaged Community Outreach Evaluation Study, a [2015 Council for Watershed Health](#) report. Detailed spatial data of these boundaries are available from the [SCWP Spatial Data Library](#).

<sup>13</sup> CalEnviroScreen 4.0 top decile pollution burden community block groups align with SCWP disadvantaged communities at the time of data collection for this report. CalEnviroScreen now defines a disadvantaged community as the top 25% of block groups in [CalEnviroScreen SB 535](#) (2022). See also the May 2022 Priority Population Investments 4.0 tool from the [Air Resources Board](#).

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.

**Next steps:** The LACFCD should modify interim guidance on community engagement to reflect these suggestions.

## Scoring Criteria

Scoring criteria should be modified to incentivize community engagement and Disadvantaged Community Benefits.

While recognizing that our principal focus is on recommending additional metrics for equitable implementation of the SCWP, we also recognize that the scoring system within the SCWP's Implementation Program is its most prominent public metrics system and that it will likely continue to influence project development and funding decisions. Therefore, we suggest two changes to the scoring system that should be considered in the 2023 biennial review of scoring.

Projects should not be able to achieve an eligible score without "Good" community engagement.

"Better" and "Best" community engagement should earn higher scores.

Project developers should have a significant incentive to achieve additional points for Disadvantaged Community Benefits that are supported by the process in our recommendations on Disadvantaged Community Benefits. Those points should augment the overall score, so that, for example, a water quality project with Disadvantaged Community Benefits could earn 110% of the maximum points in the Water Quality category.

**Next steps:** The MMS should explore these potential changes to the scoring criteria and the LACFCD should consider these changes in its next biennial review of scoring criteria.

## Severely Disadvantaged Communities

The LACFCD should consider adding a policy that acknowledges and prioritizes severely disadvantaged communities.

In our research, we found that 42% of the census block groups in Los Angeles County are classified as disadvantaged communities, where the median household income is less than 80% of the statewide median. When we look at proximity to disadvantaged communities, 86% of census block groups in the county are within a half-mile of a disadvantaged community block group, and 93% are within one mile. This is important because the benefits of urban greening can be felt over a wider area than just a project site. For instance, living within a half-mile of a park is widely considered to be within walking distance of that park, and therefore benefiting from it. And this metric is supported by National Household Travel Survey data on the average distance of a social or recreational trip, which is 0.4 miles. The average biking distance for such a trip is about two miles, and the average driving distance in urban areas is 13 miles. It is conceivable that projects could claim

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, where the need is especially great and inequities caused by structural racism, discrimination, and historical underinvestment are particularly unjust.

**Next steps:** The LACFCD should consider the feasibility of this recommendation and its potential impact on SCWP implementation.

## **Native American Indian Consultation**

The LACFCD should initiate engagement with Native American Indian communities using best practices and following the guidance of Los Angeles County and ensure that the SCWP adopts appropriate policies and programs.

Stakeholders in our process strongly encouraged this recommendation, while highlighting that few tribal representatives had taken part in our process. Our stakeholder participants and we recognize the crucial importance of engaging Native American Indian communities in the SCWP. We recommend that the LACFCD implement a specific and high-level effort to engage Native American Indian communities building on the precedent set by the county's sustainability consultation process and in collaboration with the California Native American Heritage Commission and the Los Angeles City/County Native American Indian Commission.

**Next steps:** The LACFCD should consult with the appropriate agencies and commissions and establish a process for consultation with Native American Indians on the SCWP.



# 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.

## SCWP's Provisions for Community Engagement and Equitable Implementation

As noted on the SCWP website, the LACFCD Code was originally amended in 2018 to add Chapter 16, which establishes the SCWP, and amended again in 2019 to add Chapter 18, which lays out the implementation plan.<sup>14</sup> Here we reiterate and briefly review existing ordinance language, especially in Chapter 18 (also available on the program's FAQ page), about disadvantaged communities, Community Investment Benefits, community engagement, and tribal engagement.

We note that one of the program's explicit<sup>14</sup> codified goals is to "implement an iterative planning and evaluation process to ensure adaptive management." In this vein, we also note that the SCWP issued a May 2021 Interim Guidance document on "Implementing Disadvantaged Community Policies in the Regional Program" and a March 2022 Interim Guidance Document titled "Interim Regional Program Guidance for Strengthening Community

Engagement and Support." These documents, also discussed in our results and recommendation sections, provide more comprehensive summaries of key equity terms in the existing program than we provide here, and demonstrate the potential for providing clarification of existing codes and policies and issuing additional implementation guidance documents as needed for equitable implementation of the SCWP.

Among the topics of focus here, the ordinance is clearest in its definition of disadvantaged communities, Disadvantaged Community Benefits, and the goal of the SCWP to prioritize a proportion of investments that provide Disadvantaged Community Benefits at the SCWP Watershed Area scale. Language in these definitions from the ordinance is as quoted below:

- ▶ Section 16.03(H): "Disadvantaged Community" means a census block group that has an annual median household income of less than eighty percent (80%) of the Statewide annual median household income (as defined in Water Code section 79505.5).
- ▶ Section 16.03(I): "Disadvantaged Community Benefit" means a 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.
- ▶ Section 18.07(B)2.c: Funding for Projects that provide [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. To

<sup>14</sup> 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 Watershed Coordinator(s) to utilize existing tools to identify high-priority geographies for water-quality improvement projects and other projects that create [Disadvantaged Community] Benefits within [Disadvantaged Communities], to help inform WASCs as they consider project recommendations.

The California Public Resources and Water Codes are not specific that a community boundary is defined by a census boundary, so in defining a community as a census block group the SCWP is more prescriptive about community boundaries. The state codes do, however, designate “severely disadvantaged communities,” where the median household income is at or below 60% of the statewide median household income. This designation is not part of the SCWP. The SCWP employs a definition of household disadvantage and offers an exemption of the parcel fee based on low income (and a further qualifier for senior status). This, in some ways, echoes utility affordability assistance program eligibility approaches but is actually more inclusive than most utility programs. This eligibility criterion in the SCWP is based on the California Housing and Community Development definition of “low-income” as “a household in the District with a household income that does not exceed the Low-Income limit for Los Angeles County, as determined annually by the California Department of Housing and Community Development.”

The SCWP categorizes three benefits that can be provided by a project: Water Quality Benefits, Water Supply Benefits, and Community Investment Benefits. A project that provides any of these benefit types within a disadvantaged community or directly to members of a disadvantaged community is judged to be providing Disadvantaged Community Benefits. Because the program uses the money invested in a project that provides Disadvantaged Community Benefits

as the metric of achieving the program goal of prioritizing benefits for members of disadvantaged communities, the program functionally results in a definition under which input of program investment dollars is the measure of the benefits a community will receive. It is further assumed that all of the funds invested in a project that produces Disadvantaged Community Benefits are producing benefits that will be felt by members of a disadvantaged community. SCWP policy suggests a project that provides Disadvantaged Community Benefits can be “located in or providing direct benefits to” one or more disadvantaged communities and empowers project proponents to self-describe these relationships, which are then formally verified or denied by the Watershed Area Steering Committees. This process develops the metrics necessary to comply with the minimum standard for distribution of funding, defined at the Watershed Area scale, with variation based on the relative prevalence of disadvantaged communities in each Watershed Area.

When it comes to community engagement and tribal engagement, as of now, the terms have no precise or quantifiable definition in ordinance language on project selection. The SCWP 2022 Interim Guidance suggests that a future effort will refine how tribal engagement is encouraged within the program, an effort that could benefit from the recommendations in this report. The 2022 Interim Guidance documents the many ways engagement is built into the SCWP and offers suggestions on how the program and its participants can accomplish these goals.

The goals of engagement, as described, remain unevenly achieved for lack of a standard against which everyone can be held accountable. Despite these limitations, the current language and in-progress guidance on procedural equity remain much more progressive than other major environmental infrastructure investment programs, such as the drinking water and clean water state revolving fund programs, where there is very little

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.

## **Analysis of Community Engagement, Tribal Engagement, and Disadvantaged Community Benefits in the SCWP Through an Equity Lens**

### ***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, we did not find consistent ways in which the existing SCWP ordinance and other program documents evaluate or generate accountability for the LACFCD, Scoring Committee, WASCs, Watershed Area Coordinators, or others with roles in project scoring and selection maintaining standards of community engagement. These factors helped motivate the March 2022 Interim Guidance Document released by the LACFCD titled "Interim Regional Program Guidance for Strengthening Community Engagement and Support," which provides guidance to project proponents in the Regional Program about including community engagement, and how governance committees can judge the efficacy of

engagement done and/or planned by a project.

Our and workshop participants' understanding and discussion of meaningful community engagement in the SCWP, especially in disadvantaged communities, was informed by the District's interim guidance, as well as the #OurWaterOurVoice Strategic Concepts in Organizing and Policy Education (SCOPE) report, the Prevention Institute Report on Water Health and Equity in LA, work from UCLA with the Liberty Hill Foundation on "Mobilizing the Power of WHAM," and Accelerate Resilience Los Angeles (ARLA) Working Group recommendations on achieving program goals, as well as the "Measures Matter" report from USC.

Broadly, the shift to centering local needs and preferences in project planning ensures that later results of projects, such as multibenefit outcomes, are most sought by community members who experience the landscape daily and intimately. Moreover, engaging communities in disadvantaged areas necessitates an understanding of the additional time required to engage individuals beyond a traditional infrastructure project cycle, from stages including but not limited to soliciting open-ended input, building rapport, maintaining relationships, sharing outcomes transparently, and including compensation for local consultations. Many communities in Los Angeles County also experience community engagement fatigue from being asked to provide input on many different projects and plans, usually without any coordination between proponents, and sometimes without any evident results, which adds frustration to fatigue. Cities are particularly well positioned to develop long-term engagement with their residents, where multiple departments and elected representatives can establish ongoing holistic dialogue, document community choice, and draw insights into a broad spectrum of projects and programs.

In SCOPE's report, special attention is drawn to the need for increased trust and accountability to



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 for training, resources, and enforced guidelines on projects that claim to engage community members, ensuring that they are being involved meaningfully and consistently rather than solely for a portion of project planning and implementation. The UCLA/Liberty Hill report also recommends this and suggests using the OurCounty sustainability plan as a model of how to engage and maintain the participation of community members (Liberty Hill and UCLA 2021, LA County Sustainability Plan 2019). Similarly, the Prevention Institute's report calls for comprehensive public education outreach that allows for community members to be well informed about water systems and how the implementation of SCW Program projects could provide both health and well-being benefits to disadvantaged communities, and it recommends an enhanced role for the LA County Department of Public Health (Prevention Institute 2018).

There is consensus in these reports that project eligibility scoring should better incorporate engagement metrics, and that a monitoring or mapping tool be developed that tracks community engagement efforts, progress, and magnitudes, which SCOPE's report in particular suggests could

be funded by the SCWP Education Program. Regarding incorporating community engagement in scoring, SCOPE's report recommends that a project that addresses community needs and desires, and has strong engagement before application, should be awarded additional points in the eligibility scoring system.

Beyond past work done by local water CBOs and researchers, the 2022 SCWP Interim Guidance informed our analysis and the discussion among workshop participants, although stakeholders also expressed a desire to go beyond this interim guidance. The Interim Guidance suggests that one practical step would be requiring or incentivizing project proponents to "obtain letters of support documenting that communities who will benefit from the Project are, in fact, eager for those Project benefits and supportive of the effort," which would be evaluated in the WASC project evaluation process.

This suggestion is in accordance with the reports discussed above as a means to engage community members to enhance local ownership of project implementation. The county's interim guidance also acknowledges the need articulated in past reports for further monitoring and evaluation reporting focused on community engagement; including but not limited to benefit and engagement tracking metrics, determining community support and opposition to project plans and implementation, defining community by who benefits from claimed project benefits, strengthening anti-displacement measures, and furthering green job development.

### ***Tribal Engagement***

Whereas broader community engagement was an emphasis of this study from its outset, the specific topic of engagement with tribal communities and groups in Los Angeles was not originally envisioned as part of the focus of this equity white paper or the broader MMS study. However, there was strong stakeholder

interest in our first workshop that appropriate tribal engagement needed to be addressed. The collective sentiment voiced was a desire to bring Indigenous communities into the program's equity conversation and efforts in a meaningful way, and thus this topic was prioritized in the subsequent workshop and white paper process.

The current ordinance lacks any reference to tribal engagement. The requirements of California and federal law surrounding tribal notification and consultation are included by inference as projects are implemented; however, there are no other policies related to tribal engagement. Other recent reports that touch on equity issues in the SCWP are also largely, if not entirely, silent on the topic of tribal engagement. The SCWP 2022 Interim Guidance suggests that a future effort will refine how tribal engagement is encouraged within the program, which can follow steps being taken more broadly in Los Angeles County. The county (LA County CEO, 2020) has recently acknowledged many objectives and needs concerning tribal communities in Los Angeles. Four of these objectives are potentially relevant to the SCWP:

- ▶ Adopt a formal acknowledgment of the harm against tribal nations and Native American people in which the county has been complicit and develop processes to address the harm.
- ▶ Develop countywide policies and programs to improve government-to-government relations.
- ▶ Improve land use and land management policies to make county-owned land and plant materials accessible to local tribal nations and their citizens.
- ▶ Ensure that local tribes have dedicated space to engage in cultural, traditional, and religious practices.

### ***How Disadvantaged Communities Are Defined and Spatially Distributed in Los Angeles County***

As noted above, the ordinance provides a precise definition of “disadvantaged community” and distributional requirements for program funding dollars to benefit disadvantaged communities in proportion to their prevalence within each watershed area. The SCWP’s minimum distribution of benefits threshold states that “funding for Projects that provide 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.”

SCOPE’s #OurWaterOurVoice report offers a critique of the ordinance’s definition of disadvantaged community based solely on household income. The report asserts that other factors such as health, economic, racial and ethnic, and environmental inequities disproportionately impact how communities interact with and have access to safe, clean, and affordable water. As a solution, SCOPE suggests a modified definition of disadvantaged communities in addition to the development of a mapping tool that could assess where high-need locations within disadvantaged communities should be considered as priorities for project implementation. SCOPE emphasizes that equity requires steering funding toward high-need communities. On a broader scale, UCLA and Liberty Hill’s report on WHAM implementation suggests that communities that have historically not benefited equitably from infrastructure should be prioritized. The county’s WHAM reports contain similar language.<sup>15</sup>

To identify disadvantaged communities in a way similar to the SCWP— using census data contemporary with project selection dates —

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<sup>15</sup> See “[Leveraging and Coordinating Green Infrastructure Funding: Creating the WHAM Committee](#),” Motion by Supervisors Sheila Kuehl and Hilda L. Solis, December 3, 2019, and “[Leveraging and Coordinating Green Infrastructure Funding: Implementing the WHAM Committee Workplan](#),” Motion by Supervisors Sheila Kuehl and Hilda L. Solis, June 9, 2020.

**Table 1: Statewide vs. Disadvantaged Communities Median Income**

Demographic	Median Household Income (2015–19)	Percent of L.A. County 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 **Table 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 **Table 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

**Table 2: SCW Regional Program Investments, 2019–21**

	Dollars Invested	Percent of Total Dollars
<b>All Projects Analyzed</b>	\$633.6 million	100%
<b>Projects With Claimed Disadvantaged Community Benefit</b>	\$501.2 million	79%
<b>Projects Within a Disadvantaged Community Block Group</b>	\$229.3 million	36%

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 **Table 3**. 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

use a half-mile distance because that is generally considered a “walkable” distance, within which people may enjoy the benefits of parks and urban greening, and the National Household Travel Survey finds the average walking distance for a social or recreational trip is 0.4 miles. These patterns are true at the Watershed Area scale, too. See Appendix C.

However, this proximity may be just an artifact of the prevalence of disadvantaged communities generally within dense parts of Los Angeles County. When we analyzed the spatial distribution of disadvantaged community census block groups in the county, we found that most census block groups in the county are located within a half-mile of a disadvantaged community block group, as shown in **Figure 1**. This suggests that were projects allowed to claim a Disadvantaged Community Benefit by proximity alone, the vast majority of projects would be able to make such a claim regardless of benefit type and actual impact on a nearby disadvantaged community.<sup>16</sup>

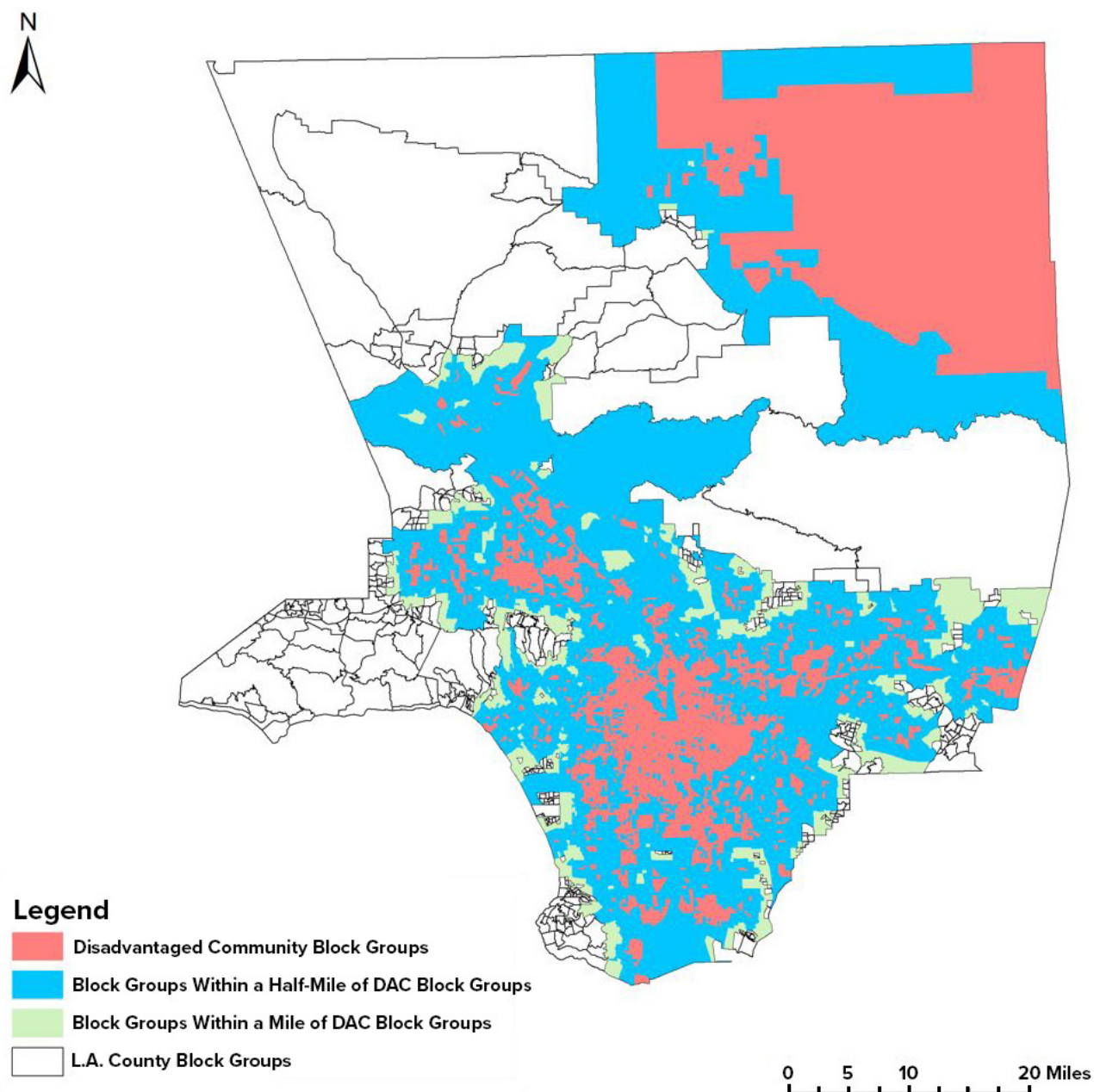
**Table 3: SCWP Funding and Proximity to Community Type, 2019-2021**

Community Type	Within the Community Block Group	Within ½ Mile	Within 1 Mile
<b>Disadvantaged Community</b>	36%	73%	79%
<b>Severely Disadvantaged Community</b>	20%	55%	72%
<b>CESBG 90% - 100%</b>	29%	54%	64%

<sup>16</sup> Block groups labeled as disadvantaged communities make up 39% of LA County. 86% of all block groups in LA County are within a half-mile of a disadvantaged community block group and 93% of block groups in the county are within one mile of a disadvantaged community block group.



**Figure 1: L.A. County Census Block Group Proximity to Disadvantaged Community Block Groups**



### ***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 Investment Benefits is perhaps most so, with opinions varying among stakeholders on which benefits should count toward eligibility scoring for projects in the SCWP, how benefits should be counted, and at which scales are the “beneficiaries” of projects judged.<sup>17</sup> Guidance on practical steps for developing a methodology is largely elusive in the scholarly literature, although Diringer et al., outline best practices, and the recent ARLA Working Group report builds on this line of quantification thinking.<sup>18</sup>

The SCWP ordinance defines a Community Investment Benefit 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 parks, habitat or wetlands; improved public access to waterways; enhanced or new recreational opportunities; and greening of schools. A Community Investment Benefit may also include a benefit to the community derived from a Project or Program that improves public health by reducing heat island effect, and increasing shade or planting of trees and other vegetation that increase carbon reduction/sequestration, and improve air quality.”

Existing policy and guidance in the SCWP state that a regional program project applicant must self-assess that a project will provide Disadvantaged Community Benefits. This guidance was recently reinforced with additional questions about Disadvantaged Community Benefits that project proponents must answer in the application portal. This self-assessment must be verified by the

Watershed Area Steering Committee when the project is added to a Stormwater Investment Plan. Both 2021 and 2022 Interim Guidance packages reiterate this policy, and in the program year 2022–23 some WASCs benefited from presentations by Watershed Coordinators and Regional Coordinators that helped the committees evaluate the claims made by project proponents.

There are few examples of a WASC changing a project applicant’s self-assessment, either to add or remove the claim of Disadvantaged Community Benefits. This could indicate either that project proponents are generally doing good self-assessments or that WASCs are unprepared or cannot evaluate the claims. Our research leads us to lean toward the latter as the most likely explanation, for reasons explained below, although the former may also be true in some cases. We could not undertake a detailed study of all claims of Disadvantaged Community Benefits, but the evidence we review in the next subsection of this report suggests that fairly widespread overclaiming of those benefits by project proponents may be occurring. This is why much of our advice to the LACFCD and the MMS focuses on how to measure and count those benefits.

Our understanding and discussion of the measurement of Disadvantaged Community Benefits and Community Investment Benefits in the SCWP were informed by many of the same reports referenced in the community engagement discussion above. SCOPE’s report expressed concern that the ordinance definition of disadvantaged community benefits allows projects to not provide Community Investment Benefits in tandem with Water Quality and Water Supply Benefits due to the inclusion of “and/or” when

<sup>17</sup> Some stakeholders argue that Water Quality Benefits should not count toward Disadvantaged Community Benefits since those benefits are the result of projects that are being built for compliance with permits and jurisdictions would need to implement those projects to meet permit requirements in any case, and therefore the Water Quality Benefit is not an additional benefit to the community. This interpretation is not supported by the language of the ordinance which states that Water Quality, Water Supply, and Community Investment Benefits can all count as Disadvantaged Community Benefits. This language recognizes that all three benefit types are inequitably distributed, and it prioritizes all three types of investments for disadvantaged communities.

<sup>18</sup> See the Pacific Institute’s 2020 report on [Incorporating Multiple Benefits into Water Projects: A Guide for Water Managers](#).

listing what counts as Disadvantaged Community Benefits. It suggests that this flexibility may allow that “[Disadvantaged Community] projects will fail to address the historical inequities and underinvestment in [Disadvantaged Communities] that brought about the targeted 110% allocation in the first place.” Furthermore, SCOPE’s analysis highlights some benefits that might be particularly valuable to residents of disadvantaged communities, including long-term jobs, health improvements, and water supply resilience.

The ARLA Working Group’s report provides the following relevant recommendations:

- ▶ Benefits should be assessed by needs and conditions specific to each watershed.
- ▶ Benefits should be predictable, measurable, and monitorable to ensure they are long term.
- ▶ Benefits [should be considered to] accrue to beneficiaries by scale and access as they are governed based on the type and scale of the benefit as well as who receives the benefit(s).

Both the ARLA Working Group’s and Prevention Institute’s analysis also highlights the need for full-time or full time–equivalent green jobs as beneficial to a community, particularly in disadvantaged communities. In the UCLA/ Liberty Hill report on WHAM implementation, transportation, public health, and green jobs are suggested as potential benefits that may be particularly valuable to residents of disadvantaged communities.<sup>19</sup> The importance of mandating displacement avoidance strategies for projects within disadvantaged communities is also noted.

### ***Claimed Disadvantaged Community Benefits in SCWP Data***

Our concern about potential overclaiming of Disadvantaged Community Benefits derives from our analysis of data from 78 of the SCWP regional

program projects located within disadvantaged communities or claiming to provide Disadvantaged Community Benefits, described here and further in Appendix B. Our findings suggest that WASCs may lack the capacity to validate the claims of project applicants. The results also suggest a need for further monitoring and evaluation of the benefits that projects actually deliver to disadvantaged communities once they are implemented.

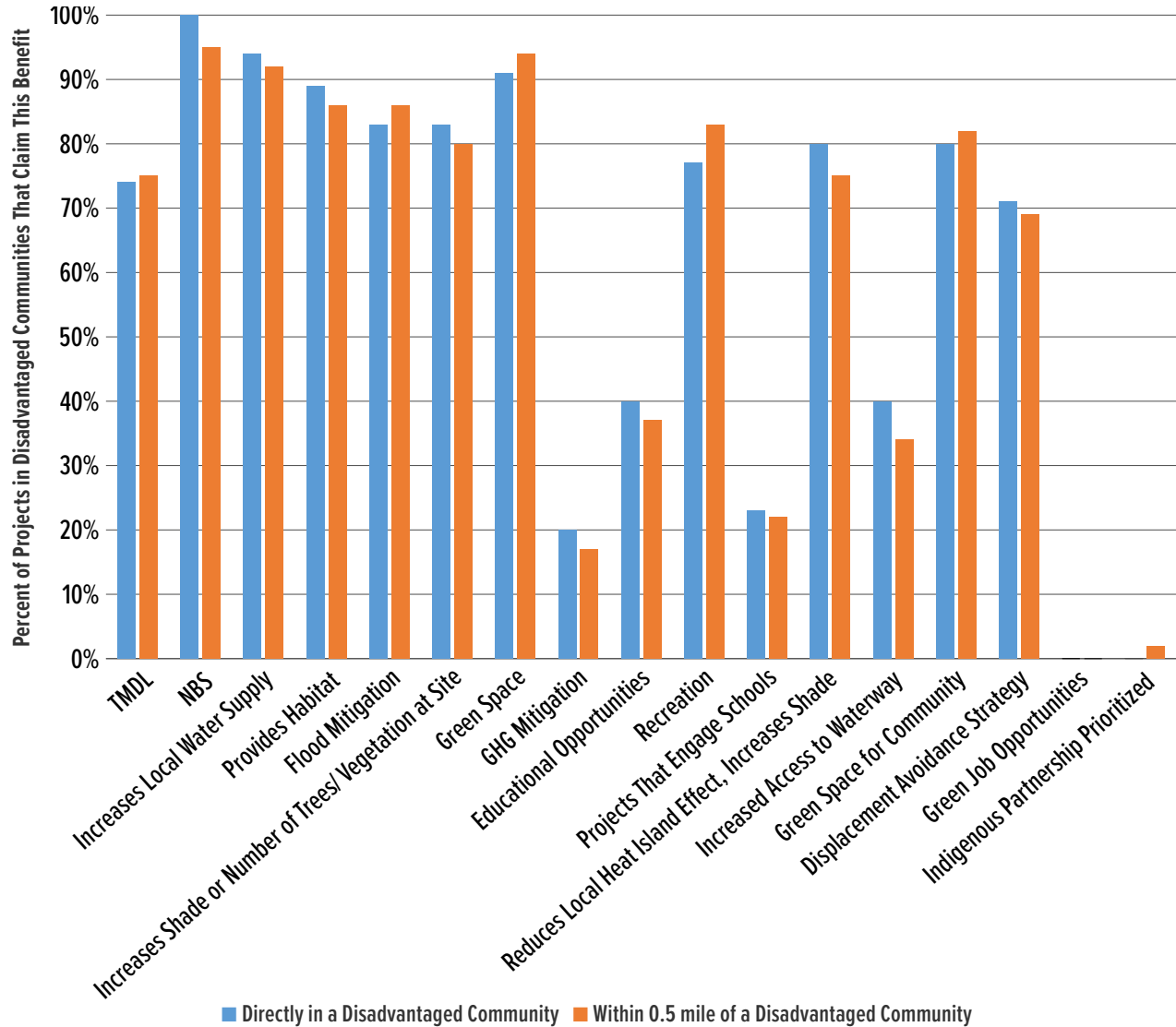
To examine claimed benefits throughout project applications, we downloaded, read, and coded SCWP regional program project descriptions from the project portal at [safecleanwaterla.org](https://safecleanwaterla.org). The SCWP portal allows users to filter projects by their program and status, funding and funding year, location and disadvantaged community status, and more. The portal does not include severely disadvantaged community information, so we also used American Community Survey (2015–2019) income data to identify severely disadvantaged communities and the top decile of CalEnviroScreen pollution burden block groups.

We applied project filters to identify SCWP infrastructure projects and technical resource program projects in disadvantaged communities for both dry and wet weather stormwater management with any amount of funding for the fiscal years 2020–21 and 2021–22. We then used the SCWP’s Spatial Data Library to download disadvantaged community project descriptions to identify each project’s watershed area and municipality, funding allocation and status, and location. The Disadvantaged Community Benefit types and funding amounts claimed by each disadvantaged community project were then manually coded.

Next, an analysis was conducted on benefit types that were claimed across all projects in different

<sup>19</sup> See Christensen, J., & Prichard, M. (2021). [Mobilizing the Transformative Power of WHAM: Overcoming Obstacles to Integrated Infrastructure Investments in Los Angeles County](#). Liberty Hill Foundation, UCLA Luskin Center for Innovation and Institute of the Environment and Sustainability.

**Figure 2: SCWP Project Benefits for Disadvantaged Communities**



types of disadvantaged community classifications (disadvantaged communities, severely disadvantaged communities, and the top decile of CESBG).<sup>20</sup> The following three figures show the prevalence of different benefits that were claimed by projects in each of those disadvantaged community classifications.

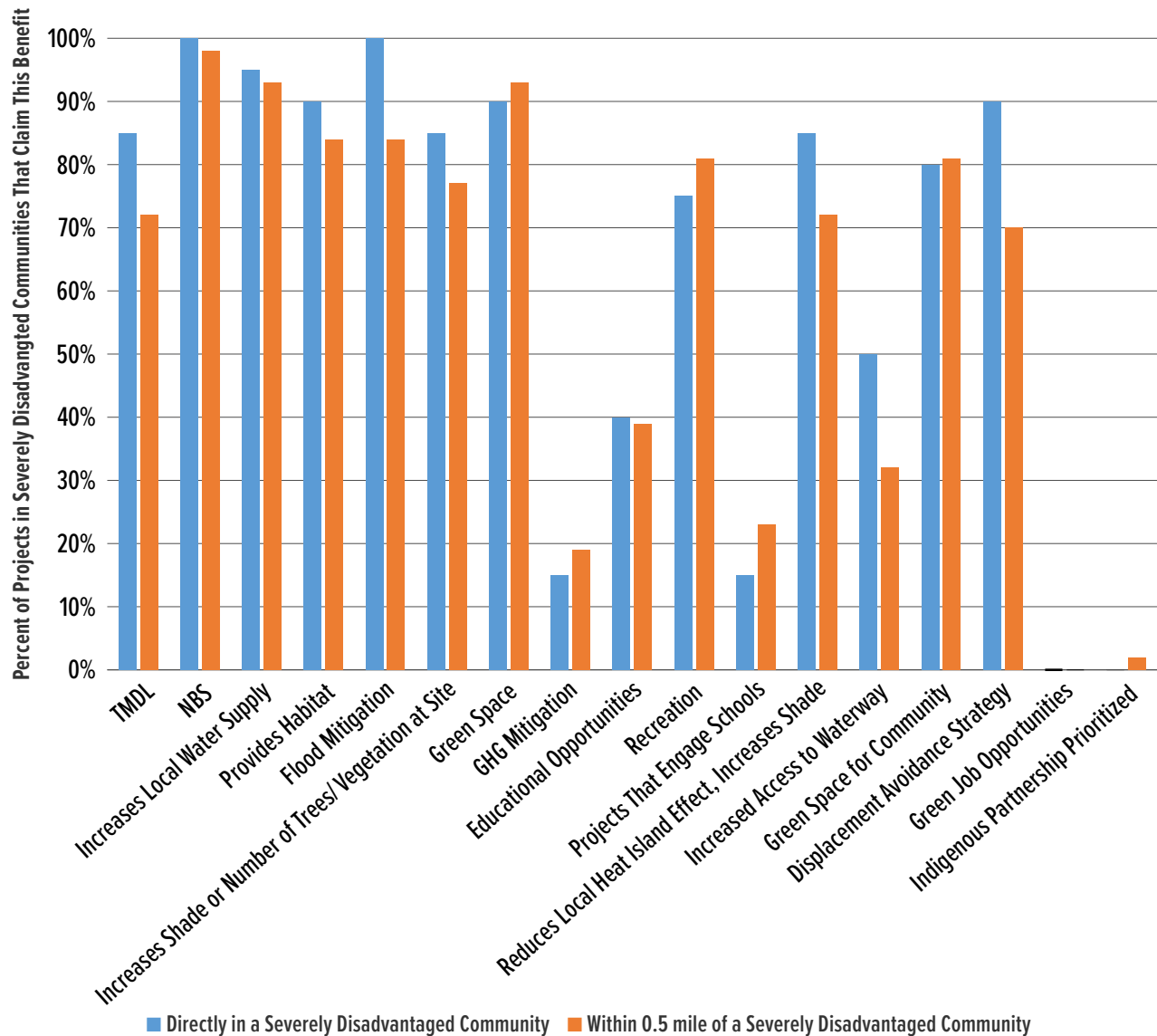
We found 35 projects located directly in disadvantaged communities that claimed benefits at different rates (**Figure 2**). Benefit types (language pulled from SCWP applications,

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

<sup>20</sup> More information on the codes used to collect these data are found in Appendix B.



**Figure 3: SCWP Project Benefits for Severely Disadvantaged Communities**



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.

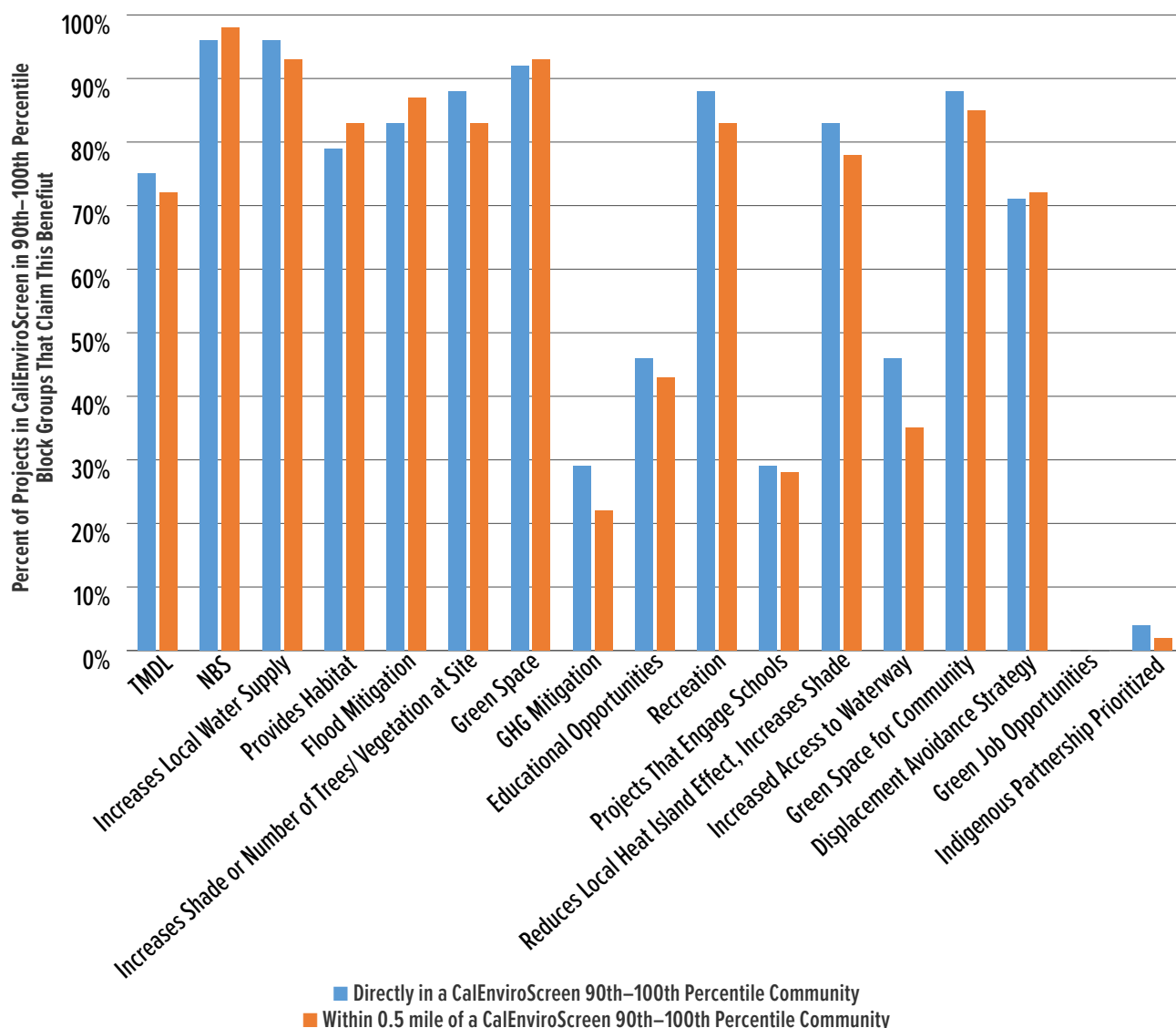
We found 20 projects located directly in severely disadvantaged communities that claimed Disadvantaged Community Benefits at different rates (**Figure 3**). Benefit types (language pulled from SCWP applications, besides Indigenous partnerships) include TMDL implementation, projects that use NBS, an increase 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 (**Figure 4**). Benefit types (language pulled from SCWP applications, besides Indigenous partnerships)

**Figure 4: SCWP Project Benefits for CalEnviroScreen 90th–100th Percentile Communities**



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 block group in the top decile of CalEnviroScreen (blue) or within 0.5 miles of a block group in the top decile of CalEnviroScreen (orange). We found an additional 26 projects located within 0.5 miles of a block group in the top decile of CalEnviroScreen.

The high percentage of projects claiming to provide numerous benefits across different types of benefits and the different disadvantaged community classifications leads us to be concerned that it is likely not a consistent system for adequately estimating and substantiating Disadvantaged Community Benefits, particularly Community Investment Benefits. The fact that more than two-thirds of the projects claim to provide displacement avoidance strategies reinforces this conclusion, particularly because there is no uniformly accepted definition of such strategies in

Los Angeles County, and there is no information about what constitutes these displacement avoidance strategies in the projects or the SCWP. These patterns suggest the need for better, detailed guidance around the ability of project proponents to claim Disadvantaged Community Benefits, which might be best ensured by robust community engagement procedures, independent monitoring processes, and further supporting WASCs in their evaluation of project applicants’ claims.

The most claimed benefit across projects and disadvantaged community classifications is Nature-Based Solutions (NBS). Other benefits also commonly claimed include water supply, habitat, flood mitigation, shade, and green space. Notably, there are more flood mitigation projects directly in severely disadvantaged communities, and more shade and recreation projects directly in the communities identified as most burdened in the CalEnviroScreen rubric.

The only exceptions to high levels of benefit claiming are:

- ▶ GHG emissions and schools (which are included but rarely claimed).
- ▶ Educational opportunities and access to waterways (which are included but relatively rarely claimed).
- ▶ Green jobs and Indigenous group partnerships (which are not a category of potential claims, even though they are raised as important project-level benefits by stakeholders).

# REVIEW OF PERTINENT LITERATURE

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**Before assessing how distributional** and procedural equity is currently incorporated in the SCWP, we discuss relevant insights from the broader water equity literature and Human Right to Water policy implementation experience in California, while recognizing their partial applicability to the SCWP. We also briefly review the academic literature on equity in stormwater management generally, and procedural equity in investment programs similar to the SCWP specifically.

In 2012, California legislated a Human Right to Water, which stipulates that “every human being has the right to safe, clean, affordable, and accessible water” (California Assembly Bill 685, 2012). The language of “safe, clean water” is echoed in the SCW Program title. However, the Human Right to Water language and associated policy efforts have largely if not exclusively been focused on water “adequate for human consumption, cooking, and sanitary purposes,” or in other words, access to drinking water and secondarily sanitation services.

Part of the reason for this relative lack of policy focus on equity in stormwater management as compared especially to drinking water is due to its less obvious and direct impact on and relationship to individual and household service “access,” and the existing federal regulatory framework being focused narrowly on compliance with the Clean Water Act as opposed to Safe Drinking Water Act compliance (for instance, see Pierce et al., 2021). This indirect relationship is arguably compounded by the legal challenges in California of establishing stormwater utilities (for example, due to Proposition 218, see Mukherjee, Mika, and Gold, 2016), and thus instituting locally designated

agency-customer (household) relationships with routine interaction.

Setting equity metrics for stormwater is also made challenging by at least three other factors (as also discussed in a recent ARLA report, 2022). First, there is a complex spatial relationship between communities and where stormwater investments are most usefully located, and where benefits accrue. This is unlike drinking water or sanitary sewer service, where a single or multiple beneficiaries are more easily identified. Second, integrated stormwater management, as is sought by the SCWP, relies on physical landscape characteristics to define areas of benefit and need: watersheds that don’t often align with formal or informal community boundaries. Watersheds of multiple scales are impacted by the SCWP with investments ranging from single parking lots retrofitted with permeable pavement to spreading grounds covering dozens of acres. Third, one of the most salient stormwater equity metrics is the prevalence of hyper-local flooding vulnerability. However, data on regular, local flooding events has not been generated across Los Angeles County due to the irregular nature of precipitation events and administrative coordination hurdles.

The above factors reflect, and contribute to, the lack of a current California stormwater equity standard or effort, as well as a dearth of proposed stormwater equity metrics among researchers in this field, especially metrics that are relevant to water-scarce regions such as Los Angeles. Academic studies touching on the social implications of stormwater investments — which have only begun to be published in the last decade — tend to assess levels of broader types of green infrastructure investment and exclusively focus on distributional equity — if equity is considered



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 higher levels of minority, Hispanic, and single-parent household populations had lower rates of GSI implementation. Private investments in GSI had left the densest, lowest-income communities of color underserved, whereas public investments seem to have moderated some of the inequity resulting from private GSI investments. Publicly funded GSI located within disadvantaged communities was found to reflect higher levels of civic engagement and demand for green local amenities within those communities. Ultimately, the study called for a strategy to coordinate GSI in disadvantaged communities with the cooperation of both informal and formal organizations. Similarly, Brent, Cook, and Lassiter studied participation in a subsidy program for private landowners to reduce stormwater runoff (2022). Eligibility was positively correlated with location in wealthier and whiter areas. Whereas within eligible areas, the wealthiest households and least white neighborhoods had lower participation rates. Their findings showed the importance of explicitly and sophisticatedly considering equity in household-level, stormwater benefit program eligibility, and participation.

Perhaps most relevantly, in a 2018 study of stormwater systems in Los Angeles County,

Porse, et al., identified more inland, socially and geographically isolated areas as lacking sufficient stormwater infrastructure, and thus having an outsized risk of flooding and water quality impairments. They also found that low property values in disadvantaged areas of Los Angeles increased the likelihood of unintentional gentrification accompanying or following greening.

Despite the general lack of scholarly guidance on specific parallels to the SCWP, the program has progressively adopted both a concept of and some distributive equity metrics for allocating program funds more equitably, which might serve as a model for state and national adoption (see Callahan et al., 2021). This has been done primarily through the concept of prioritizing investments located in or directly benefiting areas defined as a “disadvantaged community” based on median household income.

There remains some confusion introduced using the same “disadvantaged community” term under a different definition by the CalEnviroScreen mapping tool, which was developed after the term was introduced in the Public Resources Code and Water Code. CalEnviroScreen introduced a host of other metrics of pollution burden, social vulnerability, and health outcomes to its overall scoring of communities.

While simply measuring funds invested in low-income communities is certainly better than no distributional equity metric at all, it may be insufficient for measuring the equitable impact of stormwater investments as it is an input metric rather than an output or outcome metric (Callahan, DeShazo, and Kenyon, 2012). At a minimum, the nature of the “benefit” accruing to a disadvantaged community due to an investment in or near that community requires further clarification to be most impactful, as discussed further below.

While there has been a historical focus on the distributive impacts of environmental conditions (Bell & Carrick, 2017; Reed & George, 2011), it

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 meaningful consultation. Compared to distributive equity, the SCW Program has adopted less specific procedural equity safeguards, as discussed below.

## Results of Our Stakeholder Consultation Process

In addition to reviewing the pertinent literature in the field of equity and infrastructure and analyzing SCWP policies, guidelines, and projects, we conducted two stakeholder workshops. This report reflects and acknowledges the contributions that stakeholders made in those workshops and their review of a draft of this report. We invited approximately 50 representatives from local and county government offices, community-based organizations, local Indigenous communities, nonprofit organizations, and academic researchers to participate in the workshops and provide their input. Invited stakeholders who could not attend a workshop were given the opportunity to meet with our team directly to provide their input and feedback.

The goal for the first workshop was “visioning.” We asked participants to share their visions for ideal community engagement and how disadvantaged communities can define benefits from the SCWP based on their current participation in the SCWP process and their personal and professional experiences working with disadvantaged communities. Out of this discussion and one-on-one engagement with stakeholders outside the workshop our team focused on four principal areas of discussion with stakeholders: community engagement, tribal engagement, Community Investment Benefits, and Disadvantaged Community Benefits.

The focus of the second workshop was discussing draft policy recommendations, based on background research and listening in the first workshop, for each of these focus areas. After the second workshop, participants were sent an online form to rank the proposed recommendations and provide feedback. The results and feedback from the online form shaped and informed this report along with our research and discussions with the LACFCD and the broader MMS team.

After the second workshop, we developed a full draft of this report that we shared with the LACFCD and the MMS team and then with workshop participants for feedback. We offered community-based organizations compensation for their time and work in reviewing the draft report. That feedback also shaped and informed this report.

A final note before reviewing the results of our stakeholder workshops: Because we were listening to stakeholders, and allowing them to envision outcomes, we did not limit their options to what might be technically or politically feasible within the SCWP as it is currently structured. The options range from ideas that might be easy to implement with the SCWP to options that might require changes to the ordinance or potentially going back to voters, which could be exceedingly difficult and potentially counterproductive.

## Workshop Polling Options and Results on Community Engagement

Based on feedback from stakeholders in Workshop 1, a review of SCWP procedures, and literature on best practices, we outlined the following potential implementation steps for community engagement in the SCWP for stakeholder discussion during and polling following Workshop 2. These included three potential recommendations as well as an open response option:

- Requirement of proof of community engagement (local official, number of residents) via a signed letter or public meeting comments in the project selection process.

- 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 a regional fund pool for community engagement plans. For the last suggestion regarding compensation, which was raised as a priority by many stakeholders, polling results were mixed. Current county policies prevent “participation” stipends within SCWP beyond those people in appointed roles explicitly described in the program ordinance.

In the open response option, more detailed feedback on engagement documentation, scoring criteria, compensation for community members, and how to fruitfully engage communities to amplify local needs was also provided by workshop participants. Suggestions included:

- Requiring “not only signed letters which demonstrate engagement, but rather better documentation overall: Project proponents may attend community meetings, but not provide explicit community information like who participated and whether or not recommendations from local stakeholders were incorporated and when.”
- “Scoring should be clear and similar to ARLA recommendations on scoring.”
- “When compensation is provided, [Disadvantaged Communities] should be prioritized rather than communities with few/no [Disadvantaged Communities].”
- “Project proponents should ensure that applicants state what kind of community

engagement they intend or anticipate (with the possibility of incorporating SCOPE’s Spectrum of Community Engagement), similar to Regional Parks and Open Space documentation of community engagement types.”<sup>21</sup>

## Workshop Polling Options and Results on Tribal Engagement

Based on feedback from stakeholders in Workshop 1, a review of SCWP procedures and literature on best practices, we outlined the following potential implementation steps for tribal engagement in the SCWP for stakeholder discussion during and polling following Workshop 2. These included five potential recommendations as well as an open response option:

- The creation of a tribal advisory group to direct the next steps in improving SCWP.
- A standalone tribal engagement process with compensation as part of the MMS.
- Consideration and publication of tribal engagement in the form of a county interim guidance document.
- A provision that proponents must provide proof of tribal engagement aligning with the project’s broader community engagement plan.
- A provision that proponents must provide proof of tribal engagement and compensation in the project selection process.

Stakeholder feedback focused on the first two options, with numerical polling results favoring the first. But broader feedback in and outside Workshop 2 focused on an option that was not clearly listed in polling options. Generally, the sentiment voiced by stakeholders around and during Workshop 2 was summarized in the open-ended polling response of one participant regarding the “need to actively get feedback from Tribes on whose ancestral lands a project is being proposed, and make sure this feedback is early

<sup>21</sup> The “[Spectrum of Community Engagement](#)” that SCOPE recommends in its report was developed by Rosa González of Facilitating Power in partnership with the Movement Strategy Center.

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.<sup>22</sup> 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 Sustainability Office in developing its Countywide Sustainability Plan was cited as a positive and partially replicable process for the LACFCD to carry out in the context of the SCWP.<sup>23,24</sup> This effort was carried out in conjunction with the Native American Heritage Commission, the Los Angeles City/County Native American Indian Commission, and Sacred Places Institute for Indigenous Peoples.

## Workshop Polling Options and Results on Community Investment Benefits

Based on our analysis of funded SCWP project data, feedback from stakeholders in Workshop 1, and a review of SCWP procedures and literature on best practices, we outlined the following potential implementation steps for community investment benefits in the SCWP for stakeholders to discuss during, and polling following, Workshop 2. These included six potential recommendations as well as an open response option:

- ▶ Provision of further proof of specific benefit presence in the project selection process.
- ▶ Production, as a result of a community engagement process, of proof that proposed project benefits align with the benefits the community desires.
- ▶ Provision of further proof of specific benefit magnitude in both project selection process and to inform monitoring process.
- ▶ Inclusion of specific benefits for tribal communities while prioritizing tribal input.
- ▶ Greater consideration for certain benefit types counting as “community benefits” (shade, green space, flood mitigation, schools, air quality, employment).

Exclusion of certain environmental benefit types counting as “Community Investment Benefits” (TMDL, supply, habitat). [Note: We recognize that we made an error in the polling options by including “TMDL” and “supply” as examples of Community Investment Benefits. They are Water Quality and Water Supply Benefits, which can count as Disadvantaged Community Benefits, but are not Community Investment Benefits.]

Upon further discussion after the second workshop, participants indicated general alignment with the first three recommendations from the poll. Again, these include providing more proof of the presence of benefits in the project selection process, clarifying the magnitude of benefits when projects are being both selected and monitored, and ensuring that benefits claimed align with desired benefits of the communities in which projects are implemented.

The order of preference in recommendations from participant polling generally aligns with the order of the benefits presented during the second workshop. However, the top recommendation

<sup>22</sup> See the [Native American Heritage Commission Tribal Consultation Policy](#) (2016).

<sup>23</sup> For instance, see [one discrete event](#) in the later stages of this consultation process.

<sup>24</sup> See Los Angeles County’s 2019 [Countywide Sustainability Plan](#) from the Chief Sustainability Office.



polling participants chose is the production of proof that benefits align with community interest to claim a community investment benefit.

Within the poll, participants were able to provide more detailed feedback in the form of an open-ended comments section. The following is a summary of these notable recommendations:

- ▶ “There is an emphasis on supporting ARLA Working Group recommendations to the District that assesses community needs by watershed areas where project proponents could utilize those data as a baseline for engagement.”
- ▶ “Do not exclude any benefit categories in the ordinance, but rather, consider alignment with community desires and Environmental Justice principles to produce longer lasting movement towards equity.”
- ▶ “Both community desires and needs in project areas that align with overall Measure W goals should be implemented, as some needs in project areas may be unknown to community members, like climate vulnerability and lacking resilience infrastructure in disadvantaged areas.”
- ▶ “Project proponents should account for community harms or unintended consequences of project implementation.”

## Workshop Polling Options and Results on Disadvantaged Community Benefits

Based on our analysis of funded SCWP project data, feedback from stakeholders in Workshop 1, review of SCWP procedures and literature on best practices, we outlined the following

potential implementation steps for Disadvantaged Community Benefits in the SCWP for stakeholder discussion during and polling following Workshop 2. These included five potential recommendations as well as an open response option:

- ▶ Further scoring consideration should be given to the number of people within Disadvantaged Communities benefiting.
- ▶ Further scoring consideration should be given to benefits located within Severely Disadvantaged Communities.
- ▶ Further scoring consideration should be given to benefits located within Disadvantaged Communities.
- ▶ Further scoring consideration should be given to the type of benefit if location “near Disadvantaged Communities” is claimed.
- ▶ Disadvantaged community definitions beyond those in the ordinance (including CES definitions and tribal groups) should be considered.

Polling results from the stakeholder group favored the second and third options. Broader feedback in and outside the workshops also emphasized the need to focus on projects located within disadvantaged or severely disadvantaged communities. Additional feedback provided by some stakeholders suggested expanding the definition of “disadvantaged community” beyond a simple median household income metric to better identify historical systemic exclusion and cumulative impacts, potentially including a bundle of exposure and vulnerability indicators similar to how the CalEnviroScreen tool operates.

# CONCLUSION

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**We hope that this report** can be expeditiously put to use to improve community engagement and benefits for disadvantaged communities in the SCWP. We recognize that some of the recommendations and suggestions are aspirational, but we also know that the LACFCD and the SCWP are well on the way to implementing much of it, with the support of stakeholders and community members.

We have seen that common goals of good, equitable outcomes and impact are shared by everyone we interacted with while working on this report. The challenge now is to implement that vision equitably. We hope that this report illuminates an implementation path forward.

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# APPENDICES

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## **Appendix A: External Stakeholder Participant List**

AnMarie Mendoza - Water Consultant for Gabrielino Tongva Mission Indians

Belén Bernal - Nature for All

Bruce Reznik - LA Waterkeeper

Cindy Donis - East Yard Communities for Environmental Justice

Drew Ready - Council for Watershed Health

Elva Yañez - Prevention Institute

Madelyn Glickfeld - UCLA Water Resources Group

Maggie Gardner - LA Waterkeeper

Melissa Bahmanpour - River in Action

Nicole Steele - Social Justice Learning Institute

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

Rita Kampalath - LA County Chief Sustainability Office

Ryan Jackson - Los Angeles City Mayor's Office

Sandra Cattell - Sierra Club

Tiffany Wong - SCOPE

Vanessa Carter - USC Equity Research Institute



## Appendix B: Further Details on Community Investment Benefits and Disadvantaged Community Benefits Claimed in SCWP Analysis

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

- ▶ **Best Management Practices (BMP)**
  - Total Maximum Daily Load (TMDL)
  - Nature-Based Solutions (NBS)
  - Water Supply/Retention
- ▶ **Water Supply and Quality Benefits**
  - Habitat
  - Flood Management
  - Shade/Reduces Heat Island Effect
  - Green Space
  - Reduces Greenhouse Gas Emissions (GHG)
- ▶ **Community Engagement and Investments**
  - Education
  - Recreation
  - School
  - Shade/Reduces Heat Island Effect
  - Waterway Access
  - Green Space
  - Green Jobs
  - Indigenous Partnerships
- ▶ **Disadvantaged Community and Severely Disadvantaged Community Benefits**
  - 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 do they state which disadvantaged community they are located in or near. Additionally, not all projects detail whether they have a displacement avoidance strategy in place. Instead, some projects state there is compliance with displacement avoidance; some describe in detail how that displacement will be mitigated and prevented; some state N/A; and others do not address the displacement portion of the project description form. Further, not all projects provide the detail in Table A when listing community benefits. Therefore, the search terms associated with each benefit were searched elsewhere in the project description documents.

**Table A: Benefit categories and the terms searched within each project plan to determine whether those benefits were present**

Benefit	Terms Searched
Total Maximum Daily Load (TMDL)	TMDL
Nature-Based Solutions (NBS)	nature based solution, wetland, restoration, carbon, biofiltration, bioswale
Water Supply/Retention	aquifer, groundwater, recharge, water supply, infiltration
Habitat	Habitat, wildlife, native, species
Flood Management	Flood, flood management, flood control, flooding
Shade/Heat Island Effect	Shade, shade trees, heat island, canopy
Green Space	Green space, field
Greenhouse Gas Emissions (GHG)	GHG, Greenhouse, carbon, sequestration, emission
Education	Education, educational opportunity/ies, signage, educational program, interact
Recreation	Recreation, sport, trail, walkway, path, exercise, bike
School	School, class, campus
Waterway Access	Waterway, stream, river, lake, path
Green Jobs	Jobs, green jobs, employment, employment opportunity
Indigenous Partnerships	Indigenous, Native, Tribal
Disadvantaged Community	Disadvantaged community (DAC), Severely disadvantaged community (SDAC)
Displacement Avoidance Strategy	Displacement avoidance strategy, displacement, RV, tent, unhoused, homeless, tenant, property, homeowner

## Appendix C: Further Details on Community Investment Benefits and Disadvantaged Community Benefits Claimed in SCWP Analysis

<b>Watershed</b>	<b>110% Funding Threshold</b>	<b>Claimed DAC Benefit (may or may not be located there)</b>	<b>Located Physically Within a DAC</b>
Central Santa Monica Bay	53%	58%	50%
Lower Los Angeles River	78%	100%	58%
Lower San Gabriel River	23%	81%	4%
North Santa Monica Bay	0%	0%	0%
Rio Hondo	41%	95%	18%
Santa Clara River	11%	84%	0%
South Santa Monica Bay	39%	68%	17%
Upper Los Angeles River	54%	92%	53%
Upper San Gabriel River	24%	62%	30%