

June 19, 2015

Mr. Joe Edmiston
Executive Director
Santa Monica Mountains Conservancy
5750 Ramirez Canyon Road
Malibu, California 90265

Dear Mr. Edmiston,

Thank you for the opportunity to provide comments on the Santa Monica Mountains Conservancy's (SMMC) Draft Proposition 1 Grant Program Guidelines (Program Guidelines).

The Nature Conservancy (Conservancy) is a global, nonprofit conservation organization with over one million members. The mission of the Conservancy is to conserve the lands and waters on which all life depends. In pursuing this mission, the Conservancy relies on a science-based approach both to identify key threats to important natural communities and to develop effective strategies for their conservation.

Proposition 1 affords an excellent opportunity to direct funding to achieve the broader objective of moving the State toward more sustainable water management today and for future generations. The Administration's California Water Action Plan, finalized in January 2014, speaks to this "bigger picture" and lays out several key objectives to achieve greater reliability, restoration, and resilience in regards to California's water system.

In order to achieve the prioritization of meeting the broader goals of the California Water Action Plan, SMMC should reward grant proposals that deliver multiple benefits (e.g., ecosystem restoration, water quality, flood protection, economic, etc.). In addition, SMMC should have a mechanism to communicate more openly with stakeholders and that a "pre-project" consultation process and/or a mechanism for submission of "pre-proposals" should be developed to help ensure that individual projects that are submitted for consideration are framed in a manner that is consistent with achieving larger State objectives.

The consideration of preparing for and addressing the impacts of climate change should be at the forefront as SMMC finalizes its guidelines and implements Proposition 1. For this reason, we greatly appreciate the consideration of climate change in the Program Guidelines and encourage SMMC to keep this issue top of mind going forward. In addition, the Conservancy offers the following general comments on the Program Guidelines:

- We commend SMMC for supporting the State's goals of conserving water and reaching greenhouse gas reduction targets by seeking to fund land acquisition, ecosystem protection and restoration, vegetation management, water quality, and natural system function restoration projects.

- Since the guidelines assert that immediate implementation of these projects is necessary to reach near- and long-term water conservation, carbon reduction, and climate adaptation targets, we recommend that SMMC award more points for entities providing matching funds that will be used for planning or to proposals that have conducted adequate planning for the proposed project area.
- Consideration of future climate impacts is essential for long term project success. Thus, projects funded with bond funds should not only advance restoration today, but promote durability, adaptability, and resilience into the future.
- While it is important that projects reduce greenhouse gas emissions, this will be difficult for many applicants in this geography to quantify without a standard protocol to compare applications fairly and will require special resources/assistance.
- Projects funded with bond money should be required to not only provide clear metrics of success, but should also generate information from lessons learned for future funding. Projects should explicitly be required to show what went wrong in addition to the traditional list of successes.
- Projects should build from a strong science foundation and/or advance ongoing research and include publicly accessible monitoring, methods and data.
- Some allocation of funding should be reserved for investment in “pilot projects” that test new criteria, methods, and approaches for climate resilient habitat and green infrastructure projects that can demonstrate multi-benefit outcomes including potential for carbon sequestration.

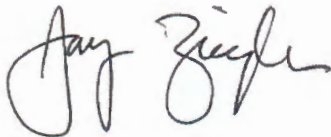
The Conservancy offers the following specific comments on the Program Guidelines:

- In Section 5, the scoring criteria awards points if a “project develops a source of non-potable water for irrigation” (14 & 17). SMMC should consider changing the language to reflect an articulation from Section 2.6, **“the project uses renewable or non-potable sources of water, such as reclaimed water, captured stormwater, or other method” (8)**. Developing a source of non-potable water is potentially unfeasible in much of the geography, especially within a reasonable budget range. However, utilizing renewable or non-potable sources of water is more feasible for projects in SMMC’s jurisdiction.
- Regarding scoring in Section 5 under Land Acquisition Projects, fewer points should be awarded than the current designation of 4 for a project that is a “partnership between two or more organizations,” because partnerships can slow down the land acquisition in this geography, can complicate the process, and are difficult to create with few groups doing specialized work, particularly in the realm of land acquisition.
- The criteria that are not eligible for funding should be awarded 1 or 2 points each, not 4 since they are not eligible projects.
- The water resources protection or watershed ecosystem restoration plans should be defined in the scoring criteria section (14).
- **“Extraordinary bargain or opportunity sale conditions” could be defined as 25% below fair market value or have a similar quantitative description (16).**

- The criterion, "Project results in additional uses for users of a wide range of ability levels" is unclear and does not seem easily quantifiable (16).
- While a project being within .25 miles of public transportation may point to public access, there should be a range here, possibly between 0 and 1 mile of public transportation. Also, this criterion should not be taken into account for major habitat corridors/linkage projects. (16)
- We support the awarding of bonus points for projects that benefit disadvantaged communities (DAC) (Disadvantaged Community Investment and Co-Benefits 8; Disadvantaged Communities 9). SMMC should also consider awarding additional points for projects located within a DAC and should require applications to demonstrate how projects will "benefit" a DAC in the grant application.

The Conservancy looks forward to the opportunity to work with SMMC to ensure the final Proposition 1 Grant Program Guidelines provide funding for multi-benefit ecosystem protection and restoration projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Ziegler". The signature is fluid and cursive, with the first name "Jay" and last name "Ziegler" clearly distinguishable.

Jay Ziegler
Director of External Affairs & Public Policy
The Nature Conservancy



June 22, 2015

Joseph T. Edmiston
Executive Director
Santa Monica Mountains Conservancy

RE: DRAFT PROPOSITION 1 COMPETITIVE GRANT PROGRAM GUIDELINES

Dear Mr. Edmiston:

Thank you for the opportunity to submit comments to your agency on the draft Proposition 1 Competitive Grant Program Guidelines. As a nonprofit, community-oriented developer of public parks and gardens, the Los Angeles Neighborhood Land Trust (Land Trust) is deeply committed to the open space conservation goals of the Santa Monica Mountains Conservancy (SMMC) and the watershed protection and restoration goals of Proposition 1.

The Land Trust's mission is to build healthier, stronger, and safer neighborhoods through the creation of urban parks and gardens in Los Angeles' low-income communities of color. Community organizing and engagement are fundamental values and practices of our organization, as low-income communities of color have been disproportionately disadvantaged by historic patterns of urban development and investment, leading to densely populated neighborhoods that lack equitable access to high quality green space. It is through this environmental justice lens that we present our comments on the draft guidelines and the forthcoming application process.

COMMENTS ON DRAFT GUIDELINES

Section 1. Preamble and Definitions

- We appreciate the comprehensive summary of state legislation, executive orders, and plans that form SMMC's framework for funding projects.

Section 2. Grantee and Project Eligibility Requirements

- *2.1. Eligible Project Types (p.4)* – We would like to see clear explanations of the six different project types and clarification as to whether applicants can apply under more than one project type.
- *2.6. Climate Change Mitigation (p.7)*
 - *c.) Disadvantaged Community Investment and Co-Benefits* – We appreciate the explanation of the numerous disparities that disadvantaged communities face and SMMC's commitment to immediate investment in these areas. The draft guidelines state that applicants are encouraged to describe "non-climate related co-benefits, such as job creation, youth employment and job training, recreation, public health benefits, or programs that engage local communities through outreach, education, and interpretation, particularly as it relates to long-term stewardship and climate change awareness." However, in the scoring criteria in Section 5, the only activity that is scored



is community engagement through outreach etc. We support the scoring of community engagement, and **we want to see scoring for all of the other non-climate related co-benefits listed in this section, as putting numeric point value on these benefits is the only way to encourage truly multi-benefit projects.**

- *d.) Greenhouse Gas Reduction Quantification* – We agree that applicants should demonstrate greenhouse gas (GHG) emission reductions that are real, permanent, quantifiable, verifiable, and enforceable. **To assist applicants in doing so, SMMC should include in its Request for Proposals (RFP) a list of the recommended GHG calculator tools and a related reference list of websites, documents, and videos that explain how to use the tools.** CALFIRE has provided such tools and references on its website for its Urban and Community Forestry Program Grants (in its RFP, it provided the link to the recommend GHG calculator tool):
http://www.fire.ca.gov/resource_mgt/resource_mgt_urbanforestry_grants.php

- *2.7. Additional Requirements for Section 79735(a) Urban Creek Projects (p.9)*
 - a.) Disadvantaged Communities – We applaud SMMC’s decision that all funds granted for urban creek projects must directly target the highest quintile of disadvantaged communities as defined by CalEnviroScreen 2.0 (at least 81% disadvantaged).

Section 4. Grant Application and Project Selection Process

- *4.2. Scoring (p.12)*
 - The first paragraph states: “... the grant applications will then be evaluated and scored by professionals in the fields relevant to the proposed projects.” Does this mean each project may be evaluated by different people? Or will the same group of evaluators review all projects under a given project type? **To ensure a fair process, we support the same group of evaluators reviewing all projects under a given project type.**
 - The second paragraph states: “Special consideration shall be given to projects that will provide the greatest benefit to disadvantaged communities and/or leverage the largest amount in matching funds.” This special consideration for providing the greatest benefit for disadvantaged communities is not quantified within the scoring criteria in Section 5. **Therefore, we recommend an additional criterion be added to all scorecards, with a point value of 5: “If the project is located in or adjacent to communities defined no less than 81% disadvantaged as defined by the CalEnviroScreen 2.0 tool, the project provides significant social, public health, and economic benefits to the disadvantaged community.”**
 - The third paragraph lists the disciplines that are not currently represented by SMMC staff. **If SMMC staff does not include experts in environmental and social justice, community development, and community engagement, we strongly encourage these disciplines to be included in the list of external consultants.**

Section 5. Scoring Criteria

- *Disadvantaged Communities*
 - Thank you for including the CalEnviroScreen 2.0 most disadvantaged community criterion as a 5-point criterion in most of the scorecards. **However, this critical criterion**



must be included on *all* scorecards, including Project Planning and Design, where it does not appear currently.

- As mentioned above, we recommend an additional criterion be added to *all* scorecards, with a point value of 5: "If the project is located in or adjacent to communities defined no less than 81% disadvantaged as defined by the CalEnviroScreen 2.0 tool, the project provides significant social, public health, and economic benefits to the disadvantaged community."
- *Outreach to Affected Communities*
 - Only three out of the six scorecards include the criterion, "Applicant has conducted outreach to the affected communities." All projects affect communities, and all applicants should be required to conduct community outreach. Therefore, we urge that:
 - **The community outreach criterion should be included on *all* scorecards with a 5-point value instead of a 3-point value.**
 - **The community outreach criterion should specify the breadth and depth of outreach required: "Applicant has conducted outreach to the affected communities, including directly contacting all residents within 0.5 miles or an appropriate service radius of the project and holding a minimum of two community meetings with linguistically and culturally appropriate materials."**
- *Point Values for Community Investment Criteria*
 - Many of the criteria that describe direct community investment receive low point values in the current draft. Investment into communities will catalyze communities' investment back into the projects, leading to a mutually beneficial connection between people and projects in perpetuity. **Community investment is critical to long-term project sustainability and environmental stewardship, and increased valuation of community investment criteria will more strongly align the scoring criteria with the underlying goals of the grant program. Therefore, we strongly urge that the following criteria receive point values of at least 4:**
 - **"Project creates a new public access point to existing parks and water resources that would otherwise be inaccessible."**
 - **"The project adds visitor-serving amenities, accessibility, and public safety improvements to public parkland with multiple ecosystem benefits."**
 - **"The site has the potential to create a new venue for education and/or interpretation activities that promote water conservation and stewardship."**
 - **"The project results in new public access to a watershed resource with high interpretive and/or educational value."**

COMMENTS ON APPLICATION PROCESS

Finally, the Los Angeles Neighborhood Land Trust would like to emphasize the need for agency outreach and technical assistance to applicants and potential applicants, especially nonprofit organizations, during the application process. **We request that SMMC hold multiple informational and assistance meetings at public transit-accessible locations throughout Southern California, as well as provide linguistically and culturally appropriate materials. Webinars and online resources should also be readily accessible from SMMC's website and publicized widely to the agency's network. An active and**



strong outreach program to increase the number of applications from low-income communities of color will only strengthen the impact of the program.

Thank you, again, for the opportunity to provide comments on the draft Proposition 1 Competitive Grant Program Guidelines. The Land Trust looks forward to engaging with SMMC as the agency revises the guidelines, and we request to receive updates on any revisions. If you have any questions or would like to discuss the requests or recommendations made in this letter, please contact Elsa Tung, Policy and Research Manager, at etung@lanlt.org or (213) 797-6559.

Sincerely,

A handwritten signature in cursive script that reads "Alina Bokde".

Alina Bokde
Executive Director

Melissa Smith

From: Joyce Dillard <dillardjoyce@yahoo.com>
Sent: Monday, June 22, 2015 4:20 PM
To: Comments@smmc.ca.gov
Subject: Comments SMMC Proposition 1 Competitive Grant Program Guidelines due 6.22.2015

Your ELIGIBLE PROJECT TYPES are:

1. Acquisition Projects
2. Water Conservation, Treatment and Improvement Projects
3. Project Planning and Design
4. Restoration Projects
5. All Other Improvement Projects
6. Vegetation Management

The California Water Action Plan three objectives are:

- *more reliable water supplies,*
- *the restoration of important species and habitat, and*
- *a more resilient, sustainably managed water resources system (water supply, water quality, flood protection, and environment) that can better withstand inevitable and unforeseen pressures in the coming decades.*

With the drought, trees and vegetation are dying yet there is no requirement to identify water sources to sustain the projects that are non-land acquisition only or project planning only.

We are not clear if an eligible project could either receive allowances or buy credits from the Cap and Trade mechanism as a Greenhouse Gas Reduction mechanism.

You state:

Multiple benefit projects that incorporate green infrastructure or water recycling and filtration techniques to produce verifiable water and energy savings.

Water recycling and filtration techniques must have a Public Health Department and/or Vector Control oversight. Soils and Geology as well as Hydrology and Water Quality must be investigated before any qualification for a viable project can be made.

We are not clear if you are allowing overhead allocation costs.

Non-governmental entities do not go out to bid on contracts. Will you require a bidding process as if a governmental agency was executing the project?

Conflict of Interest Codes should be required and submitted.. Non-profit corporations and governmental agencies already have that requirement.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, California 90065
Phone (323) 221-9944 Fax (323) 221-9934

June 22, 2015

Ms. Rorie Skei
Chief Deputy Director
Santa Monica Mountains Conservancy
5750 Ramirez Canyon Road
Malibu, CA 90265
Via email: comments@smmc.ca.gov

Proposition 1 Competitive Program Guidelines

Dear Ms. Skei:

The Mountains Recreation and Conservation Authority (MRCA) would like to congratulate the Santa Monica Mountains Conservancy (Conservancy) on the completion of the draft Proposition 1 Competitive Program Guidelines.

MRCA is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. Our agency works in cooperation with many partners at the local, State, and federal levels, including the Santa Monica Mountains Conservancy, to acquire parkland, participate in vital planning processes, complete major park improvement projects, and offer interpretive education programs.

We graciously offer the following comments on the Conservancy's draft Proposition 1 Guidelines:

1) The ineligibility of costs related to "visitor-serving amenities, accessibility, and public safety improvements" will eliminate many opportunities. This restriction ensures that no park project can be completed solely with Proposition 1 funding, yet the reality is that adequate matching funds cannot always be obtained. This restriction puts small community-based organizations at a particular disadvantage due to their limited resources. This requirement will surely slow down implementation of projects, as applicants will not be allowed to proceed without first securing other funding. In some cases, it will be impossible to secure funding for visitor amenities without funding for the majority of a project.

In addition to the negative impacts on smaller projects and implementation timeframe, visitor amenities, accessibility and public safety improvements are an integral part of any project that provides public access. Elements such as benches, trails/pathways, curb ramps, and fire engine accessways are essential if these public lands are to be used and enjoyed by the public.

The list of thirteen purposes for Proposition 1 Chapter 6 funding in section 79732(a) includes implementation of the California River Parkways Act and Urban Streams Restoration Program. Both of these programs include visitor-serving amenities, and set forth the need to provide communities safe places for recreation and enhance recreational values. A conclusion that funds designated to a Conservancy may not be used to provide public amenities in parks is preposterous. MRCA's analysis of Proposition 1 finds no basis for this restriction and recommends that these elements be redefined as eligible costs. The Conservancy's complicated scoring system already ensures that proposals without significant benefits to water will not be funded.

2) MRCA's analysis of Proposition 1 also finds that interpretive programming should be an eligible cost. The Section 79735(a) allocation of Proposition 1 funds refers to Section 79508 of the Water Code, which states, in part:

Watershed protection activities in the in the San Gabriel and Los Angeles River watersheds shall be consistent with the San Gabriel and Los Angeles River Watershed and Open Space Plan as adopted by the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Santa Monica Mountains Conservancy.

The Conservancy jointly developed The *San Gabriel and Los Angeles Rivers Watershed and Open Space Plan*, also known as the "Common Ground" plan, with the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy. The purpose of the plan was to "articulate a vision for the future of the San Gabriel and Los Angeles Rivers Watersheds" and "provide a framework for future watershed and open space planning." The plan outlined a holistic approach to watershed protection and development, organized by a set of Guiding Principles. Among other things, the Guiding Principles include the following:

- Promote Stewardship of the Landscape
- Involve the Public Through Education and Outreach Programs
- Develop and Implement Watershed-wide Public Outreach Education and Interpretive Programs

Through these Guiding Principles, the Common Ground plan links environmental education and interpretive programming to watershed protection activities. The requirement that the 79735 funds shall be consistent with Common Ground is adequate justification for finding that interpretive programming is an eligible cost, whether as a stand-alone project to promote stewardship, or as an incidental part of an improvement project.

The purposes of Proposition 1 Chapter 6 funds, enumerated in Section 79732(a), also apply to the Conservancy's Section 79731(h) funds. Interpretive programming is proven to increase public stewardship of natural resources. This type of personal interaction and education may in fact may be the single most effective tool to change human behavior. It therefore accomplishes the following purposes of 79732(a): reduce pollution or contamination of rivers, lakes, streams, or coastal waters (subsection 11); implement watershed adaptation projects (subsection 2), protect and restore aquatic, wetland, and migratory bird ecosystems (subsection 4), protect and restore rural and urban watershed health (subsection 9), protect and restore coastal watersheds (subsection 10), and promote watershed health (subsection 8). MRCA therefore recommends that activities which promote stewardship, such as interpretive programming, community outreach and education, be redefined as eligible costs. The Conservancy's complicated scoring system already ensures that proposals without significant benefits to water will not be funded.

3) While undeniably a laudable goal, the requirement that all projects must use renewable or non-potable sources of water for irrigation will eliminate many opportunities. Municipal water providers do not provide recycled water lines to all locations, and not all sites are capable of collecting sufficient rainwater or runoff for adequate plant establishment. This requirement puts smaller projects at a disadvantage because project budgets will not be large enough to add this component.

The guidelines should be modified so that project sites without renewable or non-potable water sources are not automatically disqualified. A more reasonable standard is to require that improvements be designed and implemented in such a way that when a municipal source of reclaimed water becomes available, the cost to connect to that system is minimized. For example, installing separate piping for drinking water and irrigation uses, while increasing the initial construction cost, avoids the difficulties and higher cost of separating the two later.

4) The requirement to reach a minimum score puts smaller-scale projects at a disadvantage. By definition, a smaller-scale project will have fewer features and fewer benefits, and therefore will not be able to accumulate as many points as a large project. Community-based organizations would be put at a disadvantage as they typically do more small-scale and local projects, and opportunities to make incremental improvements to parks would be missed.

We offer the following options to address this inequity:

- a) Apply a lower minimum threshold of points to smaller projects; or

b) Create a dedicated program for smaller projects that does not require them to compete with large projects; or

c) Modify the scoring so that any criteria that could only be met by a large project do not apply to smaller projects. For example, achieving eight of the Proposition's purposes is highly unlikely for a small project, and such projects should not be penalized by not receiving those points.

5) MRCA commends the Conservancy for encouraging multi-benefit projects, and those that reduce greenhouse gas (GHG) emissions. The phrase "multi-benefit project" is not defined within the Guidelines. MRCA suggests the following be added:

Multi-benefit project: A project that includes public benefits in addition to water quality and water conservation, including but not limited to habitat creation and enhancement, environmental education and interpretation, passive recreation, air quality enhancements, carbon sequestration, and new public access.

6) In the proposed scoring, the following criteria should be given higher point values:

a) "Project will prevent the conversion of natural lands to land uses with little ecological benefit" (Land Acquisition Projects). The ability to prevent actions that will have a deleterious effect on water resources and promote climate resilience into the future is one of the most important uses of Proposition 1 funds.

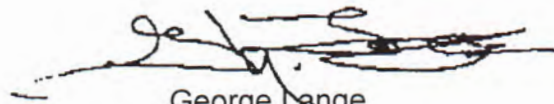
b) "Project creates a new public access point to existing parks and water resources that would otherwise be inaccessible" (Land Acquisition Projects). The ability to leverage Proposition 1 funds to increase public access to other resources is an effective way to ensure that the work results in multiple benefits.

7) Finally, MRCA commends the Conservancy for continuing to support project planning and design with a separate grant category. Funding for early design stages and land tenure work is crucial to ensuring that the goals of the Conservancy and Proposition 1 can be met. Not all potential projects will pan out but no project succeeds without significant research and planning. Project planning and design grants are essential for preparing an acquisition or improvement project to a point where implementation is feasible.

Ms. Rorie Skei
June 22, 2015
Page 5

Thank you for this opportunity to comment. If you have any concerns please contact Cara Meyer at (323) 221-9944, extension 117.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", written over a horizontal line.

George Lange
Chairperson

CALIFORNIA WATER PARTNERSHIP



American Rivers
Rivers Connect Us®



June 22, 2015

Joe Edmiston, Executive Director
Santa Monica Mountains Conservancy
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, CA 90065
Sent via email: comments@smmc.ca.gov

Re: Comments on Proposition 1 Draft Grant Program Guidelines

Dear Director Edmiston,

On behalf of the above-listed organizations, members of the California Water Partnership, we are writing to provide input into the development of the Santa Monica Mountains Conservancy (SMMC) Grant Program Guidelines for Proposition 1. The California Water Partnership is dedicated to securing a sustainable and equitable water future for California. Our partnership advocates for adoption and implementation of the principles and practices of integrated water management. Our work ensures that water management practices benefit our public health, our environment and all Californians.

In order to evaluate the efficacy of the program in achieving these benefits, we looked for the following information in the draft guidelines:

- The extent to which state priorities are addressed;
- The identification and evaluation of multiple benefits;
- Specific measures to address the water-related needs of disadvantaged communities

We believe SMMC should give preference to projects that will achieve multiple benefits to the maximum extent possible. In particular, we commend SMMC for prioritizing actions that will both achieve the State's water-related goals and reduce greenhouse gas emissions in line with State climate change mandates. The inclusion of the State's climate adaptation goals with the Conservancy's habitat and water goals is a good step towards true integration.

I. Administrative and Procedural Guidance

It is important that a diversity of organizations and agencies have access to Proposition 1 funding. Because small community organizations may not have the same capacity and experience as larger entities, we recommend that SMMC provide opportunities for applicants to work with staff on drafting applications. We appreciate that applicants

are encouraged to work with Conservancy staff to determine if projects that may not clearly fall within one of the funding categories may still be eligible for funding, but we would like the Conservancy to take it one step further.

We recommend splitting the proposal process into two steps and/or explicitly providing the opportunity for consultation with SMMC staff prior to the submittal of a final proposal. This approach is important for disadvantaged communities and for small but effective organizations. This approach would also help optimize resources and the SMMC's ability to meet their strategic goals. By having SMMC staff apprised of projects prior to the submittal of final project proposals, potential applicants can be informed early in the process as to whether or not their project would qualify for funding as initially proposed. This approach would provide applicants, particularly DACs and smaller organizations with limited resources, with the opportunity to vet their proposals with SMMC staff for project readiness and overall competitiveness prior to expending limited resources on more extensive proposal applications. This would also provide SMMC staff with an opportunity to inform project scoping to best achieve program goals. Providing a means to filter out project proposals that would not qualify would also reduce the burden of State resources spent on technical review of final proposals.

Recommendation: *Create a competitive, pre-proposal process to review concept proposals before inviting full proposals.*

II. Eligible Project Types

We commend the SMMC for recognizing in the Draft Program Guidelines that multi-benefit ecosystem and watershed protection and restoration projects can be achieved in a variety of ways, some of which include land acquisition and preservation of open space. We agree the categories of projects included offer the opportunity to achieve multiple benefits in a sustainable and comprehensive manner. However, although the criteria certainly sheds light on the types of projects desired, the Guidelines do not clearly define the project categories. We also think it would be helpful guidance to provide examples of projects in each of the five categories: Acquisition; Water Conservation, Treatment and Improvement Projects; Project Planning and Design; Restoration Projects; All Other Improvement Projects; Vegetation Management.

Recommendation: *Maintain the variety of eligible project types, but include a description of each category and provide project examples to help guide applicants.*

III. Addressing State Priorities

The Draft Guidelines call for the promotion and implementation of state plans and priorities, and are inclusive of not only the required California Action Plan and San Gabriel and Los Angeles River Watershed and Open Space Plan but also regional and statewide climate change mitigation and adaptation plans. We commend SMMC for its focus on statewide priorities and for its commitment to consider climate change implications in all of its decision-making.

Recommendation: *Maintain a comprehensive approach that addresses the State's water and climate goals.*

Proposal reviewers should assess project needs in terms of both the benefits of projects (in meeting statewide priority conservation objectives along with multi-benefits) as well as the need for Bond funding in order to make sure that funding is allocated appropriately.

Recommendation: *Projects that meet priority conservation objectives that would not be financially feasible without Bond funding or other financial assistance should be prioritized. For example, a project within a disadvantaged community that would result in ecosystem restoration or water supply augmentation but could not be implemented without financial assistance should be prioritized over a similar project type that could readily be financed locally.*

IV. Support for Planning of Multi-benefit projects.

The development of high quality, multi-benefit projects is difficult and time consuming due to the number of collaborators that should be involved in the integrated planning process, particularly members of disadvantaged

communities who should be engaged early in the planning process to ensure that projects are designed to meet their needs. Furthermore, designing projects to advance measureable criteria, particularly ecological and social criteria linked with benefits to sensitive species or disadvantaged communities respectively, requires a greater investment in the planning process. Unlike water and flood management agencies that can fund planning processes to advance their objectives, disadvantaged communities, NGOs, and fishery agencies often lack funding to plan multi-benefit projects, resulting in projects that too often fail to benefit disadvantaged communities or sensitive species. We appreciate SMMC's Project Planning and Design funding category, and recommend that those funds go to the organizations that need it most.

Recommendation: *Offer planning assistance and separate planning grants, to help organizations advance promising multi-benefit projects and demonstrate that the proposed projects will achieve measureable criteria and prioritize planning and technical assistance for disadvantaged communities.*

V. Specific Measures to Address the Water-Related Needs of Disadvantaged Communities.

We appreciate the commitment to assist disadvantaged communities through this funding source. However, the proposed method of identifying communities, located in or near a community that scores as 81% disadvantaged on Cal EnviroScreen, neither complies with the requirements of Proposition 1 nor ensures that funding actually benefits the most environmentally impacted communities.

1. Defining "disadvantaged communities." The bond clearly states that "disadvantaged community" will have the meaning set for in Section 79505.5 of the Water Code, which identifies a disadvantaged community as one with a Median Household Income (MHI) 80% or less of the State MHI. The boundaries of these communities are not specifically identified in the statute, which was originally written to refer to community water systems, which have defined service areas. While Cal EnviroScreen relies on census tract data, census blocks can also be used to better define small disadvantaged neighborhoods in urban areas, and income surveys have also been used to determine eligibility.
2. Defining benefits. Adjacency does not assure that a project benefits a disadvantaged or disproportionately impacted community. Rather, a project should address a recognized community problem, provide a benefit identified by the community or provide economic benefits such as job training or ongoing economic activity.
3. Incorporating Cal EnviroScreen into the process. Cal EnviroScreen is a useful tool for identifying communities and neighborhoods disproportionately impacted by environmental problems. We agree with the idea of providing bonus points for communities that score at 81% or higher using the Cal EnviroScreen tool, but recommend that this be calculated within the region served by this funding source.
4. Ensuring funding for most impacted communities. While the guidelines provide an incentive for projects located in or near impacted communities, the incentive may not be sufficient to ensure that such projects are promoted or funded. We recommend that a minimum amount of available funding be set aside for projects that directly benefit disadvantaged communities and that the matching fund requirement be reduced or waived for such projects.

Recommendations: *Use the definition of disadvantaged community identified in Proposition 1 (79702 (j)), but exercise flexibility in determining how MHI is measured, and in identifying the boundaries of the community; require direct benefit to the identified disadvantaged community and include criteria for measuring that benefit; consider setting aside a minimum amount of funding for projects that directly benefit disadvantaged communities; provide bonus points for projects that directly benefit communities or neighborhoods identified as being in the top 20% of impacted communities in the region.*

VI. Integrated Funding Decisions

Proposition 1 provides funding across multiple agencies to fund projects that have similar scopes and objectives. For example, the California Department of Fish and Wildlife, the Wildlife Conservation Board, the State Water Resources Control Board, and presumably several of the Conservancies all administer programs under Proposition 1 that have watershed protection and restoration as an eligible project type within their respective programs. It is important that there is a unified approach across these agencies in developing the evaluation criteria for project funding, as well as

monitoring requirements, for such projects to ensure that projects funded across the various Proposition 1 funded programs meet the same level of accountability in providing public benefits. Accordingly, agencies should coordinate in development of their program evaluation criteria and utilize staff expertise across agencies for technical review of project proposals.

Recommendation: *Develop an integration panel with other agencies (particularly the California Coastal Conservancy, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the State Water Resources Control Board) to coordinate funding decisions and facilitate joint investment in the best multi-benefit projects.*

Thank you for providing an opportunity to comment on this program. We look forward to working with you to create a strong program that will protect and restore California's important watersheds and ecosystems.

Sincerely,



Liz Crosson
Los Angeles Waterkeeper
on behalf of the California Water Partnership

120 Broadway, Suite 105
Santa Monica, CA 90401
O: 310-394-6162 x100
liz@lawaterkeeper.org

Melissa Smith

From: Melissa Guerrero <melissanlg@gmail.com>
Sent: Monday, June 22, 2015 10:09 PM
To: Comments@smmc.ca.gov
Subject: PROPOSITION 1 COMPETITIVE GRANT PROGRAM GUIDELINES

June 22, 2015

Joseph T. Edmiston, FAICP, Hon. ASLA

Executive Director

Santa Monica Mountains Conservancy

Ramirez Canyon Park

5750 Ramirez Canyon Road

Malibu, California 90265

Re: PROPOSITION 1 COMPETITIVE GRANT PROGRAM GUIDELINES

Dear Mr. Edmiston,

The LARiverWorks team in the Office of Los Angeles Mayor Eric Garcetti acknowledges the invaluable work the Santa Monica Mountains Conservancy (Conservancy) has done to preserve open space and restore the Los Angeles River's watershed. Millions of Angelenos don't live within walking distance of parks, let alone Conservancy supported multiple benefit parks that are designed to clean our environment, fulfill our souls and inspire future generations of environmental stewardship. We believe the Conservancy's Proposition 1 Competitive Grant Program Guidelines will continue to champion innovative and important environmental work for the Los Angeles region. Below we offer our comments for your consideration:

1. Additional requirements for urban creek enhancement funding is described in Section 2.7, not 2.6 as it says on page 5 in Section 2.3.
2. Disadvantaged communities are defined as those with a CalEnviroScreen rating of 81% or higher. We would recommend the Conservancy use CalEPA's definition for Disadvantaged Communities and amend language on page 9, Section 2.7, a. and wherever Disadvantaged Communities are defined throughout the guidelines to say:

“Projects must be located in or immediately adjacent to Disadvantaged Communities as defined as the 25% most impacted census tracts per the CalEnviroScreen 2.0 tool and as defined by CalEPA’s October 31, 2014 Press Release: <http://www.calepa.ca.gov/PressRoom/Releases/2014/SB535Invest.pdf>”

3. The Conservancy is taking a progressive stance on water conservation by requiring every project planting trees or vegetation to use renewable or non-potable sources of water (Page 8, Section 2.6.b). Every year the City of Los Angeles’ Department of Water and Power expands its purple pipe distribution system, but the expansion isn’t funded to meet the demand for multi-benefit parkland in the City. We recommend phasing in that kind of requirement.
 - a. Projects get 5 points if 100% of their irrigation water is supplied by renewable or non-potable sources, such as reclaimed water, captured stormwater, greywater or other method.
 - b. Projects receive 4 points for 80% or more of their irrigation water is supplied by renewable or non-potable sources, such as reclaimed water, captured stormwater, greywater or other method.
 - c. Projects receive 3 points for using a water-conserving plant palette or one that mimics natural systems by being self-sufficient after a reasonable plant establishment period.
 - d. Projects receive 2 points for using a 100% drought tolerant plant palette that has minimal habitat quality.
4. Green roofs are listed among the project components that could earn a project up to 3 points (Pages 16, 19, and 25). By listing green roofs by name, this encourages the design of green roofs, which have not historically performed well in most semi-arid conditions, especially in the hotter microclimates of the San Fernando Valley and downtown Los Angeles. We recommend removing the use of the term “green roof” throughout the document.
5. We recommend adding Energy Professionals and Energy Researchers or other professionals that are capable of advising on greenhouse gas monitoring.
6. The following are recommendations for the entire Scoring Criteria, across all Project Types (Pages 13-31):
 - a. There are criteria related to trails and visitor-serving amenities that are not eligible for Proposition 1 funding. Criteria should be re-written to make these elements eligible per the California River Parkways Act and Urban Streams Restoration Program as described in eligible uses for Proposition 1 funding for all Conservancy funding (Section 79732.a.3 of the Water Code). The River Parkways Act supports visitor-serving amenities and trails: “River parkways provide communities with safe places for recreation including family picnics; bicycling and hiking; areas for river access for swimming, canoeing, and fishing; and many other activities (Public Resources Code 5751.b).” Moreover the Urban Streams Restoration Program says, “It is the intent of the Legislature, in enacting this section, to restore the ecological viability of creek environments located in

predominantly urban areas, thereby enhancing aesthetic, recreational, and fish and wildlife values. (Water Code Section 7048.a.)” Proposition 1 also says that funding going to all conservancies can be used to “restore river parkways throughout the state, including but not limited to...urban river greenways (Section 79732.a.3 of the Water Code).” Lastly, projects that are eligible for the Urban Creek Enhancement funding per Water Code Section 79735.a must comply with the principles of the Common Ground Plan(Page 10), which includes trails and recreation. We recommend the criteria be changed to make river greenway and river parkway projects, including trails and recreation amenities, eligible for all Proposition 1 funding allocated to the Conservancy.

b. Change criterion to “Completion of the project would assist a government agency in fulfilling a water resources protection, watershed ecosystem restoration *and multi-benefit river parkway plan.*”

c. Change criterion to “The site directly abuts and increases the *size and ecosystem function* of a protected habitat area for aquatic, wetland, or migratory bird ecosystems including fish and wildlife corridors.”

d. Make this criterion worth 5 points: “Project will prevent the conversion of natural lands to land uses with little ecological benefit.”

e. Currently the following criterion receives 4 points: “The project is a partnership between two or more organizations and each organization has committed to contributing toward project implementation.” We recommend the criterion receive 3 points and 4 points be awarded to a new criterion: “The project is the result of a partnership including one or more public agencies where each partner has committed to contributing toward project implementation.”

f. We recommend that projects providing “habitat connectivity” earn 4 points. This term can be added to any of the existing criterion privileging habitat enhancement and or restoration.

g. Per the State’s Climate Adaptation Plan, we recommend that projects which “create a natural environment providing psychological respite from urban conditions” earn 2 points.

Thank you again for the consideration of our comments above. Feel free to contact me at (213) 978-1140 or Melissa.Guerrero@lacity.org for further questions or discussion.

Sincerely,



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