



DATE: February 11, 2015

TO: The Honorable Felipe Fuentes, Chair of the Energy and Environment Committee  
The Honorable Joe Buscaino, Chair of the Public Works and Gang Reduction Committee  
All City Council Members

FROM: Green LA Water Committee Members

RE: **Green LA Comments on Joint Report from Public Works, Sanitation, Engineering and Street Services (1/14/15)** in Response to the Green Sustainable Streets Council Motion (Fuentes-Bonin; CF 14-0748) relative to Stormwater Management Guidelines for Public Street Construction and Reconstruction

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The Green LA Water Committee has reviewed the Joint Report from Public Works, Sanitation, Engineering and Street Services regarding the Green Sustainable Streets Council Motion (“Motion”). Green LA previously submitted comments on the Motion and its associated Guidelines after it was first introduced in June 2014 and we continue to fully support the Motion. However, we would like to submit the following comments regarding the agency report for consideration and inclusion as this process moves forward:

- 1) We are concerned that the agencies’ response to the Motion’s request is a very simple draft framework for the forthcoming draft ordinance and lacks specificity in some important areas. The response focuses around a “stormwater management checklist” – but is silent on how this checklist would impact projects. It is also silent on the enforcement of the checklist requirements. These are two key issues that need to be addressed for this ordinance to succeed in meeting its intended goals.
- 2) As stated in the Motion, the draft ordinance is meant to address both the construction and reconstruction of public street projects. However, the report does not make clear whether the recommendations are meant for both

construction and reconstruction projects, or only new construction projects. The report should remain consistent with the Motion and Guidelines and clarify that the agencies' recommendations are meant to apply to *both* types of street projects. Also, the report does not address the definition of reconstruction. We recommend that the agencies determine a trigger (perhaps related to the size of the project) to help identify reconstruction projects. We also recommend that resurfacing be included in the definition of reconstruction.

- 3) The Handbook noted in recommendation #2 should include specific tools for volume capture, treatment and discharge (where capture is not feasible), as well as resurfacing (e.g., bioswales, curb/parkway retrofits, etc). Tools in the Handbook should also consider detention and reuse where soils do not support infiltration.
- 4) There should be an opportunity for stakeholder involvement in the *development* of the Handbook, not just the review at the end.
- 5) A design storm standard of at least 85<sup>th</sup> percentile should be used in all capture projects, with a higher capture percentage in priority areas wherever feasible, including those noted in DWP's Stormwater Capture Master Plan.
- 6) To ensure that infiltration and/or capture are prioritized wherever technically feasible, clear feasibility criteria should be included, supported by GIS data.
- 7) For street segments with moderate to severe flooding, there should be an analysis of upstream distributed capture. Upstream capture reduces overall municipal costs and enhances benefits.
- 8) The checklist requirements should also include an analysis of carbon reduction potential and heat island impacts of project design, including the impact of paver materials.
- 9) Section #1-B should include medians.
- 10) Language is important, and helps educate Angelenos and policymakers about the topic at hand. Along those lines, we recommend using more accessible language such as "improved watershed management practices" where possible throughout the documents, rather than less public-friendly descriptors such as "drainage infrastructure."
- 11) As DWP is a stakeholder in the City's One Water Initiative, we would encourage the inclusion of DWP in the list of partners collaborating on the development of funding strategies.

12) A response to the companion Motion 14-0749 on performance metrics developed jointly by the Bureau of Sanitation and the LADWP should inform and support development of the toolkit and the Handbook.

As Green LA, we believe that this Motion and the forthcoming draft ordinance are major steps in the right direction to increase water supply and decrease water pollution and flooding. We hope you will consider these recommendations in the next stages of this process.

Thank you,

Deborah Weinstein Bloome  
Director of Policy, **TreePeople**

Liz Crosson  
Executive Director, **LA Waterkeeper**

Melanie Winter  
Founder and Director, **The River Project**

Johanna Dyer  
**Natural Resources Defense Council**

Meredith McCarthy  
Director of Programs, **Heal the Bay**