

Communication from Public

Name: Bruce Reznik, LA Waterkeeper

Date Submitted: 01/12/2024 11:21 AM

Council File No: 22-0600-S54

Comments for Public Posting: Please see the attached letter from Los Angeles Waterkeeper on Agenda Item 8.



Los Angeles City Council
Energy & Environment Committee
John Ferraro Council Chamber
Room 340, City Hall
200 North Spring Street
Los Angeles, CA 90012

Submitted via website form

Re: Agenda Item 8 for January 12, 2024 Meeting, Council File 22-0600-S54

Dear Chair Yaroslavsky and Committee Members,

On behalf of Los Angeles Waterkeeper, an environmental watchdog that fights for the health of the inland and coastal waters throughout LA County and for resilient local water supplies for the region, we are disappointed in the proposed rollback of what has been a groundbreaking and successful Low Impact Development program within the City of LA.

We are especially disappointed with the rationale for this rollback, that compliance with this ordinance has slowed the development of ADUs on properties, which could be limiting available housing. While we are incredibly sympathetic with the issue of affordable housing and the unhoused crisis we have in the City, the reason for this backlog is that LA Sanitation has been long underfunded to have sufficient staff to process these applications in a timely fashion. LASAN previously asked for additional funding from City Council to support five additional staffers to assist with LID review, but the City Council did not grant that request. With a relatively small investment in needed staffing at LASAN, we could have maintained strong environmental protections AND been able to process applications so potential housing was not being slowed. We have again requested increased funding for LASAN staffing in the budget that is currently being negotiated to avoid future issues with underfunded LID review.

We also believe the rollback is overly broad – it is not just limited to ADUs or affordable housing projects, because it also covers developments and redevelopments far beyond the size needed for ADUs.

All that said, we are encouraged to see that the revised ordinance being put forward is limited to one year (to address the backlog of applications) with direction to the City Attorney and City departments to report back on the program, including conducting a fee increase study and considering other strategies to streamline LID review. Our expectation that this rollback will remain a one-year change and that LASAN will come back to the committee in a year with the fee studies and proposal for how to re-implement the current, robust LID program more effectively and efficiently, and we expect the City Council to re-adopt the existing LID program at that time.



Lastly, it is important to remind the City Council that water pollution and urban runoff, specifically, is often referred to as the "death of a thousand cuts" as the herbicides, pesticides, bacteria, metals and other toxins that pollute our inland and coastal waters come from all of us – our homes, roads, businesses, schools and other public facilities. Urban stormwater runoff is the number one source of pollution to our waterways, and the leading contributor to the fact that the vast majority of our inland and coastal waters (estimated at 80% or more) are heavily contaminated and fail to meet federal and state clean water standards.

While large stormwater projects – like those being supported through the Safe Clean Water Program – are critical to the health of our waterways, communities and water security, it is also important that we all play a role in reducing water pollution across the region. LID is a great way to do this in a distributed manner, while also aiding in creating small-scale green space at homes and other locations. Thoughtful Low Impact Development practices can also provide a myriad of other benefits, from reducing localized flooding to enhancing critical habitat through rain gardens. In fact, nearly 1% of the City is now under the LID ordinance, which provides significant environmental and community benefits while helping to save the City millions of dollars of its own funds for stormwater capture and treatment projects.

After this disappointing one-year rollback of LID standards, we look forward to the City getting back to being a leader on LID with the resources and staffing needed to manage the program effectively.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Reznik".

Bruce Reznik
Executive Director
Los Angeles Waterkeeper