


November 13, 2023

TO: Carolina T Hernandez, PE  
Stormwater Planning Division

FROM: Mark A. Lombos, PE   
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**ENVIRONMENTAL EVALUATION  
LOS ANGELES COUNTY WATER PLAN  
SWQD.EE.2022.00044**

Provided herein is an environmental evaluation and finding for compliance with the California Environmental Quality Act (CEQA) associated with the adoption of the Los Angeles County Water Plan (CWP).

**I. Background**

In Los Angeles County, water governance includes over 200 water supply, wastewater treatment, flood control, and land management agencies managing a complex network of natural and engineered water systems that should work collectively to meet the needs of the community and environment. The CWP will establish a framework to address critical water needs in the County, including water supply resilience, drinking water equity, healthy watersheds, and other identified priorities. The CWP builds upon the Infrastructure LA initiative and complements existing local and regional planning efforts, establishing a path to realizing our vision that is rooted in cross-sectional collaboration and coalition building.

Los Angeles County Public Works is the lead agency for the CWP and is working in close coordination with local water agencies, partners, and community stakeholders on the planning effort to think collectively and plan regionally on integrated solutions.

**II. Project Description**

The CWP is a high-level planning effort to identify a shared, inclusive, and regional path forward to sustainably achieve safe, clean, and reliable water resources for Los Angeles County. The CWP is organized around a framework of targets, strategies, and actions to address four key issues that affect water resources management in the County: 1) regional water supply reliability; 2) groundwater management and quality; 3) small, at-risk system resilience and drinking water equity; and 4) watershed sediment management.

The targets represent a collaboratively developed metric for measuring progress toward the shared desired outcomes of the four key focus areas of the CWP. The targets are as follows:

### **Regional Water Supply Reliability**

- A. Achieve 100 percent compliance with State Urban Water Use Objectives.
- B. Increase local supply sources by 580,000 acre-feet per year (AFY).
- C. Meet 100 percent of water demands even in times of drought.
- D. Maximize ability to meet health and safety needs following an emergency by maintaining access to 6 months of emergency supply.

### **Groundwater Management and Quality**

- E. Optimize production of groundwater by maintaining at least 700,000 AFY baseline groundwater production.
- F. Optimize production of groundwater by increasing production in areas overlying impaired groundwater by 18,000 AFY.
- G. Increase groundwater recharge and storage by enhancing regional facility recharge by 250,000 AFY.
- H. Increase groundwater recharge and storage by increasing decentralized infiltration by 30,000 AFY.

### **Small, At-Risk System Resilience and Drinking Water Equity**

- I. Reduce at-risk systems by 100 percent.
- J. 100 percent of water agencies in severely disadvantaged communities have affordable cost of water to meet health and safety needs.
- K. Reduce color, taste, and odor drinking water quality issues by 50 percent.
- L. Maximize ability to meet health and safety needs following an emergency by confirming 100 percent of small community water systems have access to alternative sources of supply.

### **Watershed Sediment Management**

- M. Reduce fire-contributing species in riparian areas by 2,900 acres.
- N. Reduce human-caused ignitions by 50 percent.
- O. Maintain a minimum of 75 percent average available capacity in debris basins and 80 percent average capacity in reservoirs.
- P. Confirm 100 percent of water management agencies within the wildland-urban interface are implementing a wildfire resilience or mitigation plan.

There are 14 strategies (attached) which provide overarching conceptual approaches to achieving the targets. The actions support the strategies with

specific steps that water resource organizations, stakeholders, and others could use to drive results, and includes timing, responsible agencies, and potential implementation participants.

### **III. CEQA Evaluation/Finding**

The CWP is not a project under CEQA pursuant to Section 21065 of the Public Resources Code and Section 15378(a) and (b)(5) of the State CEQA Guidelines, or in the alternative is exempt from CEQA under the common sense exemption pursuant to Section 15061(b)(3).

CEQA and the CEQA Guidelines establish a process for public agencies to inform decisions with environmental considerations. The first step for a public agency is to determine if a proposed activity constitutes a "project" as defined in CEQA. If an activity is not considered a "project" under CEQA, the project is not subject to CEQA. Section 21065 of the Public Resources Code and State CEQA Guidelines Section 15378 define "project" as:

*a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:*

*(1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvement to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.*

*(2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants subsidies, or other forms of assistance from one or more public agencies.*

*(3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.*

The State CEQA Guidelines Section 15378 (b)(5) also indicates that a "project" does not include:

*(5) Organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment.*

In addition, pursuant to Section 15061(b)(3) of the State CEQA Guidelines, a proposed activity is not subject to CEQA under the common sense exemption if it can be seen with certainty that there is no possibility that the proposed activity may have a significant effect on the environment.

The approval of the CWP is not a project under CEQA or in the alternative is not subject to CEQA under the common sense exemption. The CWP is a conceptual document consisting of targets that represent aspirational goals and associated strategies and actions that are general in nature and/or are organizational and administrative activities that will not create direct physical changes or reasonably foreseeable indirect physical changes to the environment. For instance, Target G of the CWP aspires to "increase groundwater recharge and storage by enhancing regional facility recharge by 250,000 AFY." However, the CWP does not describe specific activities or methods to be implemented, but instead provides a high-level strategy of "facilitating regional groundwater recharge understanding and initiatives" with actions that include facilitating partnerships and information sharing between agencies within the County or exploration of solutions that have not yet been determined at this time. The future activities to meet the targets could take on any number of forms, could be located in various different areas of the County, and could take place at undetermined future times or not at all. Without knowing more about the ultimate form, location, and circumstances at the time of the activities to increase groundwater recharge and storage, any environmental assessment of this action would be premature. The other targets, strategies, and actions of the CWP are similar in nature. Further, the CWP does not have legal binding effects on later activities. The County is not approving, adopting, or funding any of the possible later activities that may result from actions identified in the CWP. Public Works anticipates that later activities would require a subsequent review, approval, and associated CEQA analysis by the agency implementing or approving the activities, as necessary. While the projects later implemented to help attain the targets, strategies, and actions of the CWP may have some impact on the environment in the long run, the CWP at this planning stage is merely nascent and its eventual effects are highly speculative. Therefore, the CWP is not a project under CEQA and, alternatively, it can be seen with certainty that the adoption of the CWP will not have a significant effect on the environment.

Carolina T Hernandez, PE  
November 13, 2023  
Page 5

## References

Los Angeles County Public Works. (2023). Los Angeles County Water Plan, Our Route To Resilience Together. July 2023.

Los Angeles County Public Works (2020). LA County Water Plan Website. Accessed on September 6, 2023. <https://lacountywaterplan.org/Home>

If you have any questions, please contact Melissa Turcotte at Extension 4670.

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Attach.

## Appendix A – Two-Year Action Plan: 2024 and 2025

The LA County Water Plan (CWP) establishes targets, strategies, and actions towards enhancing water resilience in Los Angeles County by 2045. To facilitate implementation of the actions, the CWP program will create two-year action plans to detail specific steps that can and should be taken as part of the near-term CWP implementation program.

Upon completion of the original CWP, this initial two-year Action Plan (Action Plan) provides the specific steps to be taken during 2024 through 2025 as well as the resources needed to make progress on each CWP action during that time. Potential partners will be identified as an initial step in implementing the two-year Action Plan.

The Action Plan is organized by strategy and corresponding actions as presented in the current version of the CWP and is anticipated to be replaced with a new two-year Action Plan for 2026 and 2027.

As this is the first ever two-year Action Plan for the CWP Program, many of the steps begin with establishing task forces and/or collectives that will bring together key participants with the commitment and expertise needed to refine and initiate the actions outlined by stakeholders during CWP development. Los Angeles County Public Works (Public Works) will be responsible for working with stakeholders to form these task forces and/or collectives. While many of these groups could be led by participants from many different stakeholder entities, Public Works will facilitate the development of a framework or work plan that will be used to guide the collaboration needed to achieve the specific steps and outcomes identified in the Action Plan. Public Works will also maintain the CWP Portal as a tool that can be used to facilitate Action Plan implementation.

In keeping with the spirit of the CWP, it is expected that this Action Plan could evolve as steps are taken over the course of the two-year cycle. This may result in modifications to the steps identified in this Action Plan or new ideas as to where more meaningful steps can be taken outside of the CWP process. These modifications will be noted either during the annual implementation updates and/or carried forward to inform the development of the next two-year Action Plan.

The CWP is intended as a planning tool, or guide, for the development of a shared, inclusive, regional path forward to sustainably achieve safe, clean, and reliable water resources for Los Angeles County. The CWP is a living document which contains concepts that will only become a reality if agencies and stakeholders continue to collaborate effectively and secure corresponding resources. The CWP is subject to change based on the changing needs of the region, new technologies, future legislation and regulations, the continued cooperation of participating entities, and the availability of state, federal, and other long-term stable funding sources. The CWP is intended to provide general direction, including collaborative targets, strategies, and actions. Nothing in the CWP should be construed as a commitment by any participating agency to fund the implementation of any specific actions identified herein. Adoption of the CWP is not intended to serve as approval or authorization for any specific activity that would be considered a project under the California Environmental Quality Act (CEQA).

**STRATEGY 1: Achieving the most efficient water use possible countywide**

**Resources:** A funding source to provide data and training to water purveyors needs to be identified. Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed.

Action		2024 and 2025 Steps
<b>1.1</b>	Facilitate universal access to Los Angeles Region Imagery Acquisition Consortium data sets to help urban water suppliers accurately estimate irrigable area and reasonable water use for their service area.	<ul style="list-style-type: none"> <li>• Collaborate with LA County Geographic Information Officer to develop framework for expansion of data access</li> <li>• Recommend additional data sets to include in LARIAC (e.g., forest imagery photosynthetic index)</li> <li>• Develop rate schedule for different levels of data use</li> <li>• Develop user agreement terms</li> <li>• Coordinate with County ISD</li> <li>• Encourage user tech/analytical support for agencies with fewer resources</li> </ul>
<b>1.2</b>	Coordinate outdoor landscaping ordinances between cities, County, wholesalers, retail water agencies, and other local agencies (e.g., non-functional turf ordinances, Senate Bill 1383 mulch and composting).	<ul style="list-style-type: none"> <li>• Prepare and distribute recommended consistent ordinance language and requirements for individual agency adoption</li> <li>• Agencies should adopt MWEL0 or more stringent</li> <li>• Provide link to ordinance "clearinghouse" (include adoption dates)</li> <li>• Recommend landscape plants by garden zone</li> <li>• Make HOA limitations accessible</li> <li>• Consider offering "best examples" for each provision within typical ordinances</li> </ul>
<b>1.3</b>	Provide access to Model Water Efficient Landscape Ordinance compliance training for all water suppliers in Los Angeles County.	<ul style="list-style-type: none"> <li>• Identify funding source and training platform (e.g., ID 360)</li> <li>• Facilitate enrollment of water suppliers</li> <li>• Coordinate with dry weather flow prohibition and conditionally exempt discharge requirements of the LA Stormwater Permit.</li> </ul>

**STRATEGY 2: Collaborating on consistent drought preparedness and response messaging**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Funding through USBR and DWR drought-specific programs may be used to support development of education content and outreach costs.

Action		2024 and 2025 Steps
2.1	Collaborate on countywide drought response messaging that calls out steps that all water users in Los Angeles County can take, while directing the public to find specific measures their water supplier is taking to respond to the local drought.	<ul style="list-style-type: none"> <li>• Create common response messaging materials</li> <li>• Create list of links for water purvey drought response</li> <li>• Provide materials and links to existing, regional mechanisms (e.g., Water for LA, Be Waterwise)</li> <li>• Coordinate with dry weather flow prohibition and conditionally exempt discharge requirements of the LA Stormwater Permit</li> <li>• Find local projects through WaterTalks program</li> </ul>
2.2	Expand upon ongoing efforts to create consistent messaging on the development of drought resilient supplies.	<ul style="list-style-type: none"> <li>• Mention existing efforts during CWP meetings and outreach</li> <li>• Increase region-wide conservation messaging</li> <li>• Coordinate with dry weather flow prohibition and conditionally exempt discharge requirements of the LA Stormwater Permit</li> <li>• Find community partners through WaterTalks program</li> </ul>



**STRATEGY 3: Coupling local supply development with regional conveyance**

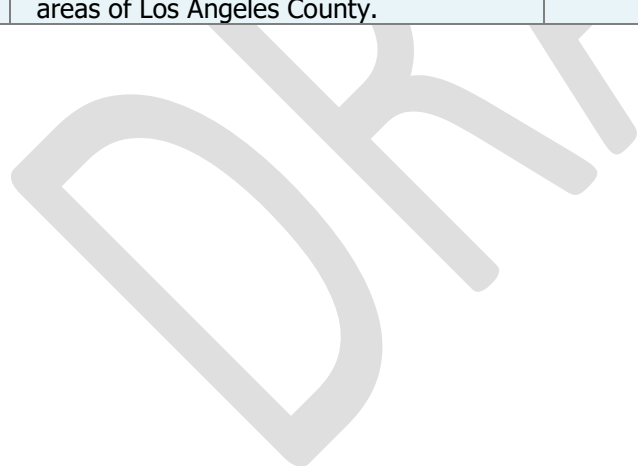
**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Funding through USBR grant programs may support implementation of future steps.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>3.1</b>	Explore options to improve feasibility (e.g., cost-effectiveness) of beneficial reuse of recycled water within Antelope Valley and Upper Santa Clara River areas of Los Angeles County.	<ul style="list-style-type: none"> <li>• Initiate feasibility study to explore the benefits/costs and potential partners and funding sources</li> </ul>
<b>3.2</b>	Encourage the use of Los Angeles County Flood Control District facilities to convey water supplies across Los Angeles County while mitigating known issues.	<ul style="list-style-type: none"> <li>• Collaborate with LACFCD to further leverage facilities beyond existing actions</li> <li>• Explore ways to divert “first flush” for productive uses</li> <li>• Collaborate on mitigation of Quagga Mussel challenges to allow expanded use of Colorado River Water</li> </ul>
<b>3.3</b>	Promote use of smart technology to assess capacity and ability of wastewater systems to accept stormwater diversion flows in existing and planned infrastructure.	<ul style="list-style-type: none"> <li>• Consider potential sites and funding sources for funding for smart technology pilot project</li> </ul>
<b>3.4</b>	Promote use of both regional local supply development and distributed local supply development (e.g., cisterns, graywater systems) and stormwater capture.	<ul style="list-style-type: none"> <li>• Determine opportunities for regional collaboration on supporting implementation on key programs</li> </ul>

**STRATEGY 4: Managing salt and concentrate regionally**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>4.1</b>	Explore alternatives to restrictions on high total dissolved solids discharges to sewer systems and variable salinity water courses (e.g., Ballona Creek or Dominguez Channel), including measures to allow for salt cleanup projects and recover treatment costs for unavoidable salinity discharges (e.g., a salt surcharge).	<ul style="list-style-type: none"> <li>• Identify alternatives to restrictions on high TDS</li> <li>• Create salt discharge and management policy recommendations for regulatory agency negotiations</li> <li>• Establish consensus that discharge needs to remain a last resort option</li> </ul>
<b>4.2</b>	Explore development of regional conveyance for concentrates, including co-location of concentrate pipelines with regional recycled water conveyance pipelines, considering treatment, discharge permitting, and actual costs.	<ul style="list-style-type: none"> <li>• Coordinate with regional recycled water program teams to determine additional concentrate management planning needs</li> <li>• Revisit concepts for regional brine line in LA Basin</li> <li>• Coordinate with Infrastructure LA on collaboration and funding opportunities.</li> </ul>
<b>4.3</b>	Collaborate across water supply, groundwater cleanup, and recycled water programs to work with regulatory agencies on concentrate management permitting and regulations across all areas of Los Angeles County.	<ul style="list-style-type: none"> <li>• Review permits and regulations to determine opportunities for joint regulator coordination across different RWQCBs</li> </ul>



**STRATEGY 5: Leveraging regional groundwater storage potential**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed.

Action		2024 and 2025 Steps
<b>5.1</b>	Facilitate development of regional banking agreements that promote increased groundwater replenishment and production, as well as infrastructure interconnections and enhancements to improve access to regional storage across Los Angeles County.	<ul style="list-style-type: none"> <li>• Form partnerships to enhance groundwater storage access</li> <li>• Develop a water accounting platform that supports regional groundwater banking and extraction</li> <li>• Identify and advocate for funding for planning, design, and construction of infrastructure expansion</li> </ul>
<b>5.2</b>	Expand regional Antelope Valley groundwater banking partnerships by assessing alternatives to mitigate capacity constraints of using imported water aqueducts that connect Antelope Valley to the Los Angeles Basin.	<ul style="list-style-type: none"> <li>• Examine the forecasted aqueduct capacity constraints, and state water contractor constraints, and identify opportunities to leverage underutilized conveyance</li> </ul>
<b>5.3</b>	Engage in regional discussion of shared local water rights concerns and basin adjudication-based exporting restrictions.	<ul style="list-style-type: none"> <li>• Identify options for potential agreements and/or policy changes</li> </ul>

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**STRATEGY 6: Collaborating on water quality needs and treatment technologies**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Funding for activities, such as pilot studies, could be sought through SWRCB Drinking Water State Revolving Fund and PFAS-specific grant opportunities.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>6.1</b>	Facilitate partnerships and information sharing between agencies within Los Angeles County to improve water treatment efficiency and cost through collaboration on piloting of and training for new technologies, working with drinking water regulators, sharing of information, lab sharing for emerging contaminant sample analysis (e.g., per- and polyfluoroalkyl substances (PFAS/PFOA)), public outreach, and leveraging of staff and funding resources. This action also supports Strategy 7.	<ul style="list-style-type: none"> <li>• Enhance collaboration/sharing between existing water quality groups and initiatives (e.g., SCCWRP, low flow diversions collaborative)</li> <li>• Identify opportunities for information sharing with agencies outside of LA County (e.g., Orange County)</li> <li>• Share expertise on potable system operations and efficiencies to address water quality issues (e.g., nitrification, taste/odor, algal blooms)</li> <li>• Host an online platform to share and collect information about technologies, pilot studies, and trainings</li> <li>• Consider opportunities for potential pilot projects tied to funding and bulk lab testing</li> <li>• Create list of opportunities for regional training (e.g., plant operation) and community outreach</li> </ul>
<b>6.2</b>	Collaborate on proactive negotiations with Regional Water Quality Control Board(s) to provide a consistent regional voice on National Pollutant Discharge Elimination System permitting and future water quality regulations.	<ul style="list-style-type: none"> <li>• Identify challenges to the existing NPDES system</li> <li>• Agree upon desired permitting and water quality standards</li> <li>• Initiate conversation with RWQCB(s)</li> <li>• Coordinate with SCAG/COG</li> </ul>
<b>6.3</b>	Advocate for State emerging contaminants source control policy and funding.	<ul style="list-style-type: none"> <li>• Increase understanding of treatment residuals and define reasonable protections for treatment agencies</li> <li>• Write draft language for a PFAS/PFOA source control policy (leveraging SB54) and a PFAS-free procurement policy for adoption</li> </ul>

**STRATEGY 7: Enhancing cost-effectiveness of pumping and treating impaired groundwater**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Specific activities (e.g., water quality mapping) could be funded through SWRCB’s Cleanup programs.

<b>Actions</b>		<b>2024 and 2025 Steps</b>
<b>7.1</b>	Facilitate partnerships and information sharing between agencies within Los Angeles County to improve water treatment efficiency and cost through collaboration on piloting of and training for new technologies, working with drinking water regulators, sharing of information, lab sharing for emerging contaminant sample analysis (e.g., per- and polyfluoroalkyl substances (PFAS/PFOA)), public outreach, and leveraging of staff and funding resources. This action also supports Strategy 6.	<ul style="list-style-type: none"> <li>• Develop plan to approach regulatory bodies (EPA, RWQCB, SWRCB), invite to task force as needed</li> <li>• Create forum for arriving at regional approach on regulatory requirements, or consistent implementation of regulations (both for recycled water and remediation)</li> <li>• Educate agencies further on the DDW permitting process for an extremely impaired source for direct potable use (97-005) through information sharing</li> <li>• Connect with statewide advocacy</li> </ul>
<b>7.2</b>	Identify poor water quality development zones within all County groundwater basins that could be beneficially used and advocate for funding to create and implement production enhancement plans.	<ul style="list-style-type: none"> <li>• Create map of poor water quality zones overlaid with production enhancement plan areas as well as inoperable units, distribution pipelines, recharge banking areas, and treatment plants</li> <li>• Show timelapse map of positive changes in impaired WQ zones (historical to present)</li> </ul>
<b>7.3</b>	Explore opportunities to use existing remediation operations as a potential water supply source.	<ul style="list-style-type: none"> <li>• Identify permitting needs and funding opportunities</li> </ul>
<b>7.4</b>	Facilitate partnerships on regional treatment funding and financing opportunities, prioritizing supply diversity, water quality, and resilience of small at-risk systems.	<ul style="list-style-type: none"> <li>• Identify opportunities for beneficial regional treatment projects and potential funding sources</li> <li>• Explore partnerships with Industrial General Permittees</li> </ul>

**STRATEGY 8: Protecting coastal groundwater basins from seawater intrusion**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Seawater barrier operations and maintenance is funded through existing LACFCD funding.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>8.1</b>	Determine vulnerability of barrier programs to seawater intrusion as a result of future sea level rise and evaluate opportunities to optimize barrier system operations.	<ul style="list-style-type: none"> <li>• Conduct vulnerability analysis utilizing a decision-scaling approach</li> </ul>
<b>8.2</b>	Explore partnership opportunities to create further investments and increase recharge potential at barriers to enhance protection and increase groundwater supply.	<ul style="list-style-type: none"> <li>• Identify potential sources of water to increase recharge at barriers</li> <li>• Leverage analysis and suggestions from the vulnerability analysis (action above) to optimize protection</li> <li>• Understand larger regional programs and the effects on groundwater levels for the long-term which may change barrier operation</li> <li>• Expand barrier operations meeting to include vulnerability discussion, barrier success ownership, and bring recycled water providers to the table to discuss barrier success beyond just operational constraints.</li> <li>• Create an organizational chart for partnerships and how the agencies and divisions within agencies fit</li> </ul>



**STRATEGY 9: Facilitating regional groundwater recharge understanding and initiatives**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed.

Action		2024 and 2025 Steps
9.1	Facilitate collaboration between groundwater basins within Los Angeles County to share information, resolve common impediments, and provide consistent guidance that will facilitate increased potential for groundwater recharge and accounting of anticipated and realized benefits provided.	<ul style="list-style-type: none"> <li>• Share access agreements and permitting processes to streamline outreach, permitting, and access for groundwater facilities</li> <li>• Generate list of considerations for recharge including source water quality, recharge infrastructure, monitoring, accounting</li> <li>• Identify and distribute to relevant information sharing forums</li> <li>• Educate stakeholders at critical milestones to understand agency capabilities and constraints</li> <li>• Leverage coordination with USBR</li> <li>• Identify key references related to groundwater basin collaboration</li> </ul>
9.2	Create a consolidated groundwater basin data platform that highlights geohydrologic interconnections and flows with an information sharing system for use to develop regional storage and groundwater management partnerships.	<ul style="list-style-type: none"> <li>• Develop a regional groundwater basins data platform with information on potential funding sources for maintenance</li> <li>• Collect assumptions and data to develop a mechanism to identify statewide wet year water to build on local efforts</li> </ul>
9.3	Facilitate discussions with regulators that will streamline permitting and facilitate further enhancement of groundwater recharge potential.	<ul style="list-style-type: none"> <li>• Initiate conversation with EPA on recharge project interaction with remediation operable units to maximize recharge and draft language to incorporate into standards</li> <li>• Identify barriers and opportunities to streamline Section 404 and Section 408 permitting and initiate conversation with USACE</li> </ul>
9.4	Acknowledge Los Angeles County’s Flood Control District’s Sediment Management Strategic Plan to maximize recharge facility capture and infiltration rates and efforts to remove invasive species to improve groundwater recharge.	<ul style="list-style-type: none"> <li>• Mention importance of sediment management through CWP program</li> </ul>

**STRATEGY 10: Facilitating natural infiltration of precipitation**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed.

Action		2024 and 2025 Steps
<b>10.1</b>	Facilitate recharge partnerships between stormwater and groundwater managers by enhancing understanding of surface water rights and stormwater.	<ul style="list-style-type: none"> <li>• Identify areas that would benefit from increased coordination and existing opportunities/ground to facilitate coordination</li> <li>• Develop "Watershed University" training program to facilitate inter-specialty understanding and coordination (e.g., groundwater and stormwater managers)</li> <li>• Examine opportunities to leverage existing programs that could enhance partnership across the region (e.g., education plans from LACPW and others, including the Safe Clean Water Program)</li> <li>• Leverage CASQA initiatives</li> </ul>
<b>10.2</b>	Conduct decentralized facility infiltration water quality impact analysis for groundwater basins to determine parameters for facility implementation and/or mitigation for changes to water quality.	<ul style="list-style-type: none"> <li>• Create countywide inventory of decentralized recharge facilities</li> <li>• Share information on local programs and solutions to identify best practices</li> <li>• Consider opportunities for joint efforts, such as developing a test and water quality monitoring (including PFAS) program/framework</li> <li>• Collaborate on test parameters and funding with State agencies</li> </ul>



**STRATEGY 11: Providing regional support for small, at-risk water systems**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Program could be funded through a specialized allotment from SWRCB (e.g., Drinking Water State Revolving Fund, SAFER, and technical assistance programs). Funding could support annual program actions and project implementation. Participation in program is assumed to be through active engagement with small water system operators.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>11.1</b>	Initiate a voluntary Small, At-Risk System Support Program or programs to promote small water system resiliency, not just address near-term emergency needs.	<ul style="list-style-type: none"> <li>• Adopt a LA County Board of Supervisors policy supporting the establishment of the program</li> <li>• Establish a dedicated Public Works team</li> <li>• Create Small, At-Risk System Support Task Force</li> <li>• Determine methods to engage small, at-risk agencies in defining supportive actions and program elements</li> <li>• Identify and secure upfront funding for program development</li> </ul>
<b>11.2</b>	Identify “at-risk” systems and technical, managerial, and financial needs by collecting existing data (such as the County Department of Public Health’s ongoing system inspection (i.e., annual sanitary surveys)) and assessment program reports, drawing upon the United States Environmental Protection Agency technical, managerial, and financial assessment guidance.	<ul style="list-style-type: none"> <li>• Collect existing TMF data and other data included in the SAFER, Human Right to Water, Cal Mutuals and UCLA at-risk evaluations</li> <li>• For small systems with LACDPH annual sanitary surveys, establish a methodology based on Cal Mutuals, EPA, and SWRCB guidance to quantify TMF needs from the qualitative reports</li> <li>• Outreach to understand status of infrastructure and a financial audit of the water system</li> </ul>
<b>11.3</b>	Facilitate Small, At-Risk System Support Program to provide administrative and technical advisory support to small, at-risk yet viable purveyors to take a range of resiliency actions (e.g., create Water Master Plan and asset management program, ensure workforce succession planning, establish and check interconnections, ensure emergency storage, enhance cybersecurity, acquire emergency generators, provide resources for grant applications, regulatory compliance, and existing operations and maintenance, etc.).	<ul style="list-style-type: none"> <li>• Conduct proactive outreach by going to identified purveyors to encourage participation in program</li> <li>• Create a resiliency checklist</li> <li>• Provide administrative and technical advisory assistance to small community systems through the program to identify and develop needed actions</li> <li>• Incentivize collaboration between large and small agencies, retailers, and wholesalers to accelerate project readiness for funding opportunities (e.g., federal Infrastructure Bill)</li> <li>• Create a mentoring/education program framework for Board members</li> <li>• Identify grant opportunities within SWRCB Technical Assistance Provider program for local agencies to support other systems</li> <li>• Facilitate partnerships on infrastructure interties to allow for access to alternate supplies</li> <li>• Encourage membership in CalWARN</li> </ul>

<p><b>11.4</b></p>	<p>Develop program to map, monitor, address, and alert the public to drinking water quality issues that originate from on-site plumbing issues, including monitoring for color and odor issues in premise plumbing, especially in underrepresented communities.</p>	<ul style="list-style-type: none"> <li>• Identify approach and funding to establish a methodology and monitoring plan to evaluate post-distribution water quality, specifically for taste, odor, and color issues</li> <li>• Advocate for SWRCB assistance in identification of systems with taste, color, and odor issues that may already be meeting secondary MCL</li> </ul>
<p><b>11.5</b></p>	<p>Encourage all Los Angeles County agencies to adopt and implement hazard mitigation plans.</p>	<ul style="list-style-type: none"> <li>• Compile list of agencies that have a hazard mitigation plans</li> <li>• Track the status of specific actions in the Hazard Mitigation Plans</li> </ul>
<p><b>11.6</b></p>	<p>Expand local agency participation in Water Information Sharing and Analysis Center to access the latest cybersecurity strategies.</p>	<ul style="list-style-type: none"> <li>• Identify list of water agencies in WaterISAC and outreach to agencies not participating</li> </ul>

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**STRATEGY 12: Mitigating wildfire effects on water supply and quality**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Additional funding for regional wildfire prevention and watershed management programs may be available through CAL Fire or other state grant programs.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>12.1</b>	Organize a regional wildfire prevention collective that brings together water, land, and fire managers to collaborate, share information, and explore opportunities for mutually beneficial watershed management programs and projects (e.g., fuel reduction, invasive species removal) for both riparian and upper watershed areas.	<ul style="list-style-type: none"> <li>Identify opportunities for specific collaboration considering existing forums and funding potential for those activities</li> <li>Develop list of water utility infrastructure and resources in high-risk areas</li> </ul>
<b>12.2</b>	Create a programmatic permitting tool/process with the United States Army Corps of Engineers for the 404 permit for fuel reduction measures that applies to the entire County and with the Regional Water Quality Control Boards for the 401 Water Quality Certification.	<ul style="list-style-type: none"> <li>Initiate conversation with USACE and RWQCB on permitting</li> <li>Identify barriers to attaining permits</li> </ul>
<b>12.3</b>	Enhance existing low water use landscaping education programs to include fire-scaping with information on species that contribute to wildfire spread (e.g., eucalyptus, palms, rosemary), fire starts, firesafe planting standards, landscaping choices, and water collection systems for use during fires.	<ul style="list-style-type: none"> <li>Develop a curriculum and materials consistent with firesafe landscape plan requirements</li> <li>Assess opportunities to coordinate with SB 1383 mulch programs to provide free compost and/or mulch to large parcels to improve soil health</li> </ul>
<b>12.4</b>	Collaborate on identifying and pursuing funding opportunities to support regional wildfire prevention programs.	<ul style="list-style-type: none"> <li>Create compilation of water agency lands in need of fuel reduction treatments</li> </ul>
<b>12.5</b>	Enhance existing hazard mitigation plans to include regional fire management strategies for agencies located within wildland-urban interfaces.	<ul style="list-style-type: none"> <li>Create a map that overlays historical fire areas, fire agency service areas, critical infrastructure, and other layers to identify areas more vulnerable to wildfires</li> </ul>
<b>12.6</b>	Advocate for modifications to existing air quality regulations that allow water agencies run emergency generators longer during fire events to maintain water supply.	<ul style="list-style-type: none"> <li>Initiate conversations with CA Air Resources Board (CARB)</li> </ul>
<b>12.7</b>	Explore potential land, trail, and forestry management efforts on wildfire prevention in upper watershed areas as well as along transportation and utility corridors to remove ignition sources as	<ul style="list-style-type: none"> <li>Consider existing efforts in concert with CWP actions</li> </ul>

	well as existing firefighting efforts to minimize dispersal in riparian areas.	
<b>12.8</b>	Support efforts exploring alternatives to fire retardants containing PFAS/PFOA that may run off into streams and spreading grounds.	<ul style="list-style-type: none"> <li>• Better understand the timing and location of fire-retardant application as a potential for PFAS/PFOA runoff into streams and spreading grounds (e.g., develop map of water resource infrastructure for USFS resource advisors).</li> </ul>

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**STRATEGY 13: Managing invasive species in riparian areas**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Program activities could potentially be funded through multiple sources, including but not limited to DWR’s Riverine Stewardship Program or USBR’s Multi-Benefit Projects to Improve Watershed Health and Cooperative Watershed Management Program.

Action		2024 and 2025 Steps
<b>13.1</b>	Enhance existing Weed Management Area for Greater Los Angeles to serve as an overall invasive management decision team with tiers of information sharing to support coordination among agencies (permitting, resource sharing, defensible space guidelines, etc.) with state and federal involvement and an invasive land coordinator.	<ul style="list-style-type: none"> <li>• Identify opportunities to enhance Weed Management Area group</li> <li>• Advocate enhancements to state and federal representatives</li> </ul>
<b>13.2</b>	Share information on areas with invasive species of mutual concern across Los Angeles County as well as planning initiatives, programs, and measures being taken to reduce invasives in riparian areas.	<ul style="list-style-type: none"> <li>• Share updates and activities from ongoing relevant programs</li> <li>• Map locations of invasive species</li> <li>• Share education materials to provide consistent messaging on public websites</li> </ul>
<b>13.3</b>	Consider initiating an annual regional invasive species removal program and post-fire program to improve soil quality and reduce repropagation, further spreading, and biomass fuels.	<ul style="list-style-type: none"> <li>• Explore biomass conversion</li> <li>• Conduct a preliminary needs assessment</li> <li>• CNRA Cutting the Green Tape initiative</li> </ul>
<b>13.4</b>	Explore collaboration with United States Army Corps of Engineers, United States Forest Service, state and national parks, individual cities, nonprofits, and private landowners in invasive species removal in watershed areas managed by water and flood control agencies.	<ul style="list-style-type: none"> <li>• Initiate group conversation with agencies</li> <li>• Compile and compare invasive species removal policies, practices, and impacts on water resources (e.g., herbicidal methods)</li> <li>• Work to align and build from each other’s efforts and identify gaps in management</li> </ul>

**STRATEGY 14: Facilitating sediment management and debris removal from flood control facilities**

**Resources:** Pursuit of resources for the establishment and facilitation of resulting task forces would be led by Public Works and other participating agencies. In-kind time for volunteer participants is assumed. Specialized activities such as mapping to be funded in partnership with other benefiting agencies.

<b>Action</b>		<b>2024 and 2025 Steps</b>
<b>14.1</b>	Improve modeling and weather forecasting to predict the risk of sediment-laden flows after wildfires.	<ul style="list-style-type: none"> <li>Identify mechanisms to integrate weather forecasts and wildfire events into flood control modeling and examine simulated impacts of sediment-laden flow</li> <li>Identify areas that are vulnerable and suitable for erosion mitigation measures.</li> </ul>
<b>14.2</b>	Improve understanding of how debris flows and fires impact percolation rates.	[After 2025]
<b>14.3</b>	Advocate for policies of regulatory agencies that provide more flexibility for removal of vegetation and therefore sediment accumulating in debris basins, spreading basins, lakes, and reservoirs as well as erosion control measures.	<ul style="list-style-type: none"> <li>Coordinate with CDFW on “cutting green tape” initiative for flexibility in vegetation removal (e.g., exemption from “compensatory mitigation” for capacity maintenance in debris basins and reservoirs)</li> <li>Identify erosion control measures and create guide for when/where to implement specific measures</li> <li>Map priority areas for erosion control measures (e.g., application of mulch, native planting, other bioengineering techniques)</li> </ul>
<b>14.4</b>	Promote education and engagement at the community level as to the importance of sediment and debris management to maintain local flood protection.	<ul style="list-style-type: none"> <li>Support development of education content</li> </ul>

<b>Acronym</b>	<b>Agency/Organization Name</b>
USFS – ANF	United States Forest Service – Angeles National Forest
CAL Fire	California Department of Forestry and Fire Protection
Cal Mutuals	California Association of Mutual Water Companies
CASQA	California Stormwater Quality Association
CDFW	California Department of Fish and Wildlife
CNRA	California Natural Resources Agency
LACDPH	Los Angeles County Department of Public Health
LACPW	Los Angeles County Public Works
LACFCD	Los Angeles County Flood Control District
RWQCB	California Regional Water Quality Control Boards
SCAG	Southern California Association of Governments
SWRCB	California State Water Resources Control Board
USACE	United States Army Corps of Engineers

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