

Public Comments on Draft Targets, Strategies, and Actions

1. Introduction

The County Water Plan (CWP) development began in summer 2020 with significant input from water agencies, environmental and environmental justice organizations, Tribes, and other stakeholders, as summarized in Appendix D of the CWP. An important component of stakeholder engagement and Plan development was comments from the public on the Draft CWP. The Draft CWP was released to the public on August 3, 2023, and had an extended 45-day comment period. The Plan Development Team received over 200 comments and 7 letters from about 40 unique commenters. The feedback received was helpful in enhancing and clarifying the CWP.

This document summarizes thematic comments received on the Draft targets (Table 1) and strategies and actions (Table 2). It also identifies topics brought up by commenters that, although not included in this edition of the plan, are important and will be considered for inclusion in the next CWP edition. Specific individual comments on the body of the report were addressed as applicable and often aligned with one of the thematic comments.

2. Comments on Draft CWP Targets

Table 1 Thematic Comments on Draft CWP Targets

Target	Comment	Response
A	Target A should not be linked to State Water Use Objectives because they do not go far enough and there is uncertainty because they haven't been finalized yet. Include an indoor conservation goal.	The objective of this target is to align requirements and avoid conflicting standards.
C	Clarify water 'needs' versus 'wants' (e.g., non-excessive use) for low- and high-income households to make sure the target is equitable.	Urban retail water suppliers are responsible for defining "excessive water use" per California Water Code §366 (2022), and must consider average daily use, full-time occupancy of households, amount of landscaped land on a property, rate of evapotranspiration, and seasonal weather changes. The standards for excessive use are intended to be consistent between low- and high-income residents.
D	Emergency water should be sourced locally.	Local water is an important part of the portfolio, and many jurisdictions have prioritized expansion of local water and less reliance on imported water. Imported water is subject to disruption and local water can be more reliable in some natural disasters. The intent of this target is to secure diverse supplies to meet health and safety needs regardless of water source.
F	Explicitly include brackish groundwater desalination and cleanup/remediation.	Impaired water is not meant to be inclusive of all groundwater treatment, including brackish groundwater and wells within operable units that are already receiving treatment. This target is intended to capture additional treatment needs for "stranded" groundwater.
G & H	Recommend a minimum of 150,000 AFY of new stormwater recharge between the targets G and H (centralized and decentralized).	Decentralized infiltration in Target H was increased from 30,000 AFY to 80,000 AFY based on available data in the LA Basin Study. Since the CWP is a living document, additional increases could be incorporated

Target	Comment	Response
		into future iterations of the CWP as additional data and tools become available to substantiate this Target.
J	Clarify whether this affordability metric was just to be applied to severely disadvantaged communities (SDACs), applied only to water suppliers operating in SDACs (but not those not operating in them), or to everyone.	This metric is applicable to everyone; therefore, the Target J language was updated to reflect that the target is for all Los Angeles County residents and that the affordability threshold is based on the income of SDACs.
K	Reducing complaints broadly is not good enough – Target K should reduce complaints across all neighborhoods and make sure that the complaint rate/metric is not biased by neighborhood.	Access and comfort with filing complaints can vary. However, this target does capture customer perception, which is just as important as water quality samples. The data is insufficient to capture complaint data by each neighborhood due to differing collection/recording methods.
M-P	The focal area should address wildfire prevention, not just watershed sediment management.	The CWP intends to address strategies and actions that can be taken by water agencies and the water community. Land managers outside of riparian areas, who are primarily responsible for wildfire prevention, are outside of the purview of the CWP. The Plan aims to coordinate CWP strategies and actions with land management agencies responsible for wildfire prevention and suppression.
N	Reduce site development in fire-prone areas.	Land management and zoning is outside of the purview of the County Water Plan and water agencies. The intent of the Plan is to align efforts in collaborative ways.
O	There should be a separate Target about sediment management that recognizes the benefits of natural sediment transport.	The commenter is directed to the Sediment Management Strategic Plan for specific management, benefits, and operations of debris basins: https://dpw.lacounty.gov/lacfcd/sediment/stplan.aspx .

3. Comments on Draft CWP Strategies and Actions

Table 2 Thematic Comments on Draft CWP Strategies and Actions

Strategy /Action	Comment	Response
1	Highlight or create a coordinated direct install and "pre-bate" program for water efficient technologies to promote equity.	An implementation step was added to Action 1.2 to consider offering direct install and/or "pre-bate" programs.
1.2	Consider landscape transformation with vegetated, multi-benefit, nature-based solutions and align with existing landscape transformation ordinances.	An implementation step was added to Action 1.2 about investigating ARLA's Landscape Transformation roadmap.
2.1	Expand beyond Water Talks and leverage other ongoing work.	An implementation step was included for Action 2.1 to include RedesignLA and other programs in addition to WaterTalks.
3.1	Would like a countywide assessment of how we can most effectively and efficiently pursue recycled water while minimizing negative impacts and inequity.	Removed "(e.g., cost-effectiveness)" in Action 3.1 and included "explore the cost-effectiveness, benefits, equity considerations, potential partners, and funding sources" as an implementation step for Action 3.1.
3.3	Expand the action to include graywater, tanks/cisterns, an example of smart technology, and use outside of just wastewater and stormwater diversion flows.	Added "controls and monitoring" and "(e.g., advanced metering infrastructure)" to Action 3.3. Greywater will be considered for a future edition of the Plan. See page H-9.
4	Consider actions that would specifically support concentrate management for inland projects (e.g., Antelope Valley).	This is in alignment with Action 4.2. Project specific conditions will be considered during implementation.
4	Commit to no ocean brine discharges.	This strategy strives to manage concentrate discharges effectively with minimal impacts on the environment. The plan outlines targets, strategies and actions, but does not require

Strategy /Action	Comment	Response
		specific actions or commit any agency or entity.
4.1	Replace Action 4.1 with a new Action committing to compliance with the Chloride Policy and focusing on upstream solutions and source control.	The CWP does not have jurisdiction over groundwater basin management arrangements, which are already held to meeting relevant existing policies and guidelines.
5	Add an action about new large-scale recharge, especially in the Los Angeles River Watershed.	During implementation, the Task Forces will build upon listed strategies, actions, and implementation steps to adaptively manage. Additionally, the commenter is directed to the Safe Clean Water Program for more information about groundwater recharge with stormwater and how projects are identified and selected: https://safecleanwaterla.org/ .
6.1	Include funding (not just information sharing).	Action 6.3 is about collaboration on funding and already includes "leveraging... funding resources"
6.2	Remove word "negotiations" - it suggests the County intends to enter backroom deals with regulatory agencies to relax standards, rather than participating in public processes over water quality regulations along with any other stakeholder.	Replaced with "collaborate proactively" with Regional Water Quality Board(s). The intent of the Plan is not to relax standards but enhance collaboration.
6.3	Focus on addressing root causes of contamination from industry instead of just treatment.	Action 6.3 includes source control policies. Expanded policies and enforcement to prevent further water contamination will be considered for potential inclusion in the next edition of the Plan.
7.1	Investigate alternative approaches to pump-and-treat, such as bioremediation.	Action 7.1 is inclusive of alternative treatment approaches including bioremediation.
7.3	Should express a stronger commitment to remediation,	The CWP is intended as a regional planning tool only. Actions such as 7.2

Strategy /Action	Comment	Response
	including securing funding for large-scale remediation of groundwater basins.	and 7.4 support the pursuit of funding that could support future activities.
8	Include a new action to respond to flooding from groundwater upwelling associated with Sea Level Rise.	Strategy 8 is focused on protecting groundwater quality and supply. Localized flooding is managed by local stormwater agencies.
8.1	The vulnerability assessment under Action 8.1 must consider equity.	The implementation steps in Action 8.1 were updated to clarify that equity will be considered in the vulnerability assessment.
9.3	Streamlining regulations is an inappropriate attempt to influence regulators and shortcut important water quality regulatory requirements.	Action 9.3 was not intended to disregard important water quality regulations but rather to enhance collaboration to achieve shared goals. This has been revised.
9.4	Replace any vegetation/hardscape removal with native vegetation.	This feedback will be considered in the context of future updates to the Sediment Management Strategic Plan.
10	Would like to see an emphasis on the use of nature-based solutions for stormwater infiltration.	Strategy 10 includes nature-based solutions for natural infiltration of precipitation and the narrative has been modified to reflect this.
10	Seeking more specificity and guidelines for actual recharge projects and specific recharge locations, including the Los Angeles River floodplain.	The CWP does not recommend or advocate for any specific projects. The commenter is directed to the Safe Clean Water Program for more information about groundwater recharge with stormwater and how projects are identified and selected: https://safecleanwaterla.org/ .
10	Create a goal for landscape transformation and hardscape removal.	Land management is not within the purview of the CWP. Strategy 10 encourages local recharge through vegetation and other solutions.

Strategy /Action	Comment	Response
10.2	Enhance nature-based solutions.	Clarified that the implementation steps in Action 10.2 include nature-based solutions.
11	Add additional actions and implementation steps to the Small Systems Program.	While the recommendations from commenters provided excellent ideas for the Small, At-risk Systems Support Program, the current edition of the Action Plan includes steps that can be completed in the next two years and the Program may not be able to accommodate these steps right away. These ideas will be provided to the workgroup or task force addressing this issue.
11.3	Clarify which purveyors will be eligible for participation in the Small, At-Risk System Support Program.	Action 11.3 was modified to indicate that purveyors eligible for potential participation in the Program would be identified through Action 11.2.
12	Consider CEQA/NEPA for approved fire retardants.	The CWP does not include or advocate for specific projects or operations that would be considered a project under CEQA.
12.2	Include the Coastal Development Permit through the Coastal Commission.	Modified Action 12.2 to include the Coastal Development Permit.
12.1	Include regional post-fire monitoring and restoration programs.	Modified Action 12.1 to also include post-fire monitoring and healthy watersheds.
12	Acknowledge existing efforts and clarify the CWP Strategy 12 expectations of water agencies.	The CWP intends to build upon existing efforts and support the land management and fire entities, who play key roles in wildfire prevention. Strategy 12 is about how the water management community can support and enhance their efforts.

Strategy /Action	Comment	Response
13	Explicitly include Tribes and tribal knowledge in Strategy 13.	Tribes are a key stakeholder in managing invasive species. Action 13.4 was modified to explicitly include Tribes as a key stakeholder.
13	Would like to see active restoration of natural lands and native vegetation planting.	Strategy 13 broadly is inclusive of native vegetation planting. Action 13.4 was updated to include native planting policies in addition to invasive species removal.
13	Broaden Strategy 13 beyond riparian areas and strengthen language.	Strategy 13 does not expand beyond riparian areas since those locations can fall outside of the jurisdiction of water agencies, which is outside of the purview of the CWP.
13	Add an action on funding.	Funding is an important consideration for all strategies and actions, not just Strategy 13. Early implementation steps may require less funding as they begin with establishing work plans and taking collaborative actions. As initiatives that require funding are developed, funding will need to be a part of creating implementation pathways.
14	Sediment removal should be small scale and frequent, not large-scale that could impact ecosystems/habitat/water quality/etc.	The Flood Control District’s Sediment Management Strategic Plan is responsible for the approach and operations of debris basins: https://dpw.lacounty.gov/lacfd/sediment/stplan.aspx . The CWP intends to facilitate related information, engagement, and potential policy making.

4. Topics for Considerations in Future Editions of the CWP

The Plan Development Team received many valuable comments and ideas on the 2023 Edition of the CWP, including some that may be further explored in future iterations of the plan. In general, these topics fall into two categories.

First, several of these topics are covered and led by other programs, as outlined in the “Establishing Focal Areas” section of the Plan (page 14). These topics include stormwater management, regional recycled water programs, groundwater basin projects, integrated flood management, and land stewardship. At some point, the CWP may also include these areas in the future if it would add value to regional planning efforts. This edition of the Plan aims to fill gaps versus create redundancy with existing efforts.

Second, topics that are not covered by existing initiatives would be well suited for potential consideration in future iterations of the Plan. The following list is *not* exhaustive of topics for potential inclusion in a future edition of the Plan. It only includes suggestions for topics recommended by commenters during the Public Draft Review period. Topics include:

- Greywater
- Desalination
- Expanded small water systems actions (e.g., premise plumbing solutions, consolidation)
- Concentrate management and resource recovery
- Expanded nature-based solutions and Low Impact Development ordinances
- Expanded policies and enforcement to prevent further water contamination