

Water Quality Working Group Engagement Compendium

May 14, 2025 Safe, Clean Water Program Watershed Planning WatershedPlanning@PW.LACounty.gov



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Meeting Summary 3

Date: 19 March 2025

From: Hayat Rasul, Mike Antos, Stantec

To: SCW Program Watershed Planning Team

Re: Interested Party Engagement Meeting Summary

Safe, Clean Water Program Watershed Planning Regional Oversight Committee Water Quality Working Group Engagement 3

Wednesday, March 19, 2025 11:00 AM – 12:00 PM (PST)

Attendees

Working Group Members

Mark Gold, Natural Resources Defense Council and Safe, Clean Water Program Regional Oversight Committee Norma Camacho, Los Angeles Regional Water Quality Control Board and Safe, Clean Water Program Regional Oversight Committee Mark Lombos, Los Angeles County Public Works Bruce Hamamoto, Los Angeles County Flood Control District, SCR & NSMB WASC Jenny Newman, Los Angeles Regional Water Quality Control Board Ken Susilo, Geosyntec Michael Scaduto, City of Los Angeles Susie Santilena, City of Los Angeles, Co-Chair CSMB WASC, SSMB WASC

Staff and Consultants Present:

Melanie Morita-Hu, Justin Jones, Jonpaul Sarro, Bryan Igboke, Jason Jade Pepito, Genevieve Osmena (SCWP Watershed Planning (WP), Los Angeles County Public Works)

Thom Epps (Craftwater) Jack Mikesell, Dustin Bambic (Paradigm) Raina Dwivedi (Conservation Natural Resources Group) Chris Minton (Larry Walker Associates) Mike Antos, Hayat Rasul (Stantec)

Meeting Discussion

This summary memo describes strategies shared by the water quality (WQ) working group and their synchronicities with the existing in-progress work of the SCW Program Watershed Planning Effort.

Discussion on the Water Quality Working Group Recommendations Document

The Water Quality (WQ) Working Group leads presented a document modeled after the water supply strategy document, aiming to establish overarching goals, objectives, and priorities for WQ. Lead authors Mark Gold, Norma Camacho, and Jenny Newman refined the alternative approach, which is attached with redlines, to create a comprehensive policy strategy document. This document highlights the importance of WQ targets and sets an overarching goal for WQ within the SCW Program, with objectives and priorities based on the Watershed Planning Framework and past Governance Committee Meetings on Watershed Planning.

The Working Group indicated that the document is ready for review by the Regional Oversight Committee (ROC) for consideration of inclusion in the Biennial Report. Members of the Working Group expressed a desire to take the document through the ROC to the County Board of Supervisors (BOS).

The document and the Working Group strive for alignment with previous efforts and recommendations, ensuring consistency with prior work (e.g., EWMPs). It also addresses policy framework changes since January 2025, considering the new Federal administration.

Discussion on the WQ Watershed Planning Presentation

Consultants presented the in-progress WQ Targets that will be included in the Initial Watershed Plans. These plans cover the three existing pollutants being monitored and additional ones like trash, PCB, and DDT. The team noted that time series for DDT, bacteria, and PCBs are not currently available from the County's Watershed Management Modeling System (WMMS), which is identified as a gap to address during adaptive management.

Strategies are designed to support the program and project developers, helping municipalities participate in the municipal program. The technical team confirmed that, in the future, projects can leverage efforts to prioritize high pollutant load areas to maximize multi-benefit solutions.

The WQ Working Group emphasized the need for the Watershed Area (WA) planning tool to include SCW-funded projects and other relevant projects since 2000. They added that guidance will be provided to help inform this, using WMPs to select strategies. Beyond the 2026 Adaptive Plan, the WQ Working Group wants the Initial Watershed Plan to explain how all WP are linked together to achieve 2038 Total Maximum Daily Load (TMDL) goals and standards. Members requested the development of a Countywide Adaptive Management Implementation Plan to assess existing data and baseline WQ. Additionally, they want load

reduction and project-based targets to be linked to countywide targets to help WASCs select projects based on results.

The WQ Working Group highlighted the importance of understanding how SCW is tied to the Los Angeles County Water Plan and other countywide efforts, ideally forming an overarching umbrella strategy. They encourage a phased approach over 2-3 years.

The WQ Working Group also requested a pause to assess monitoring data and discuss potential course corrections. Members clarified that permittees requested emergency holds on MS4 compliance, and similar considerations may be needed here. They support spatial prioritization and want project-specific maintenance costs included to understand BMP effectiveness. The group expressed that wildfire impacts and vulnerabilities should be considered, including resilience overlaps. There were also concerns about implementation with the WASC and future efforts to identify priority projects. The WQ Working Group wondered how this can be translated into something that can incubate larger projects. They emphasized the importance of climate resilience and wildfires as a response to climate change, incorporating wildfire into the program and discussions around Community Investment Benefits.

Action Items for Watershed Planning:

- The Working Group will engage with the document and provide feedback to Jenny by 3/24. PW and consultants are coordinating the finalization of the document.
- The Working Group would like to see the conversation held today reflected at the April or May ROC meeting.
- Public Works will discern how recommendations apply to Watershed Planning and how others may fit in other County efforts.
- The Group wants to see climate resilience and wildfire resilience incorporated into the existing language of the Program (see CIB and BR Working Group Action Items, which parallel this ask).

Results:

- A final version of the Working Group memo, attached below, was delivered by the working group to Public Works on March 28, 2025.
- On April 16, 2025, Norma Comacho confirmed this document is the final draft from the working group, and no additional changes are expected before the May 14, 2025 Regional Oversight Committee meeting.

Revised Memorandum

From: Regional Oversight Committee Water Quality Working Group

For: Watershed Planning

Date: March 28, 2025

Alternative Approach for Developing Water Quality Targets for Safe Clean Water Program Watershed Planning

This memo represents the recommendation for water quality targets from the ROC Water Quality Workgroup. Water quality targets provide an opportunity for Countywide assessment of SCWP efficiency. They also offer a way to center water quality regulations, which were the impetus for the SCWP, when making watershed planning decisions. The Workgroup's recommendations for water quality targets are intended to help realize these possibilities.

Importance of Water Quality Targets

Specific, measurable targets that are clearly linked to water quality in receiving waters are necessary to focus municipalities' limited resources on priority water quality issues. Although SCWP does not provide adequate resources to meet Water Quality Standards attainment, it will serve as a catalyst to cleaner and safer water for people and aquatic life. There are a variety of sources that affect the quality of receiving waters, but WASCs do need to know how much progress SCW projects have made in attaining water quality standards in their watersheds. This assessment is critical in helping the WASC set water quality improvement priorities for projects. Specifically:

- Targets that are set with the goal of attaining water quality standards in receiving waters will help WASCs strategically prioritize projects during planning, as well as measure success after implementation. Focusing on water quality standards attainment will also help leverage resources from other funding sources.
- Targets that are developed and expressed spatially, with clear deadlines based on water quality regulations such as the MS4 Permit, will help WASCs prioritize projects in critical areas that will have the most impact on water quality.
- Targets and watershed planning that consider the work of previous efforts, such as the LA County Water Plan, MS4 WMPs, and the City of Los Angeles' Watershed Investment Strategic Plans, will ensure project benefits are cumulatively assessed for more efficient disbursement of SCWP funding.

The following proposed water quality targets are intended to assess progress under the SCWP for watershed planning purposes and <u>are not</u> meant to determine compliance with the MS4 Permit or as criteria to receive ongoing funding under the SCWP. The County would not be held accountable for not meeting the targets. Rather, the targets are a way to provide direction and a common goal to strive towards.

Proposed Alternative Water Quality Targets Approach

This proposal attempts to include parallel language to the existing Watershed Planning Process and Structure presented at the December 11, 2024 ROC meeting so that the proposal can be considered for incorporation into the existing framework.

Overarching Goal (Countywide Target) – Meet water quality standards in all receiving waters directly impacted by dry weather and stormwater runoff **by 2038**.



Objective 1 (Develop Watershed Area Interim Targets) – Attain interim load reduction targets in each of the nine Watershed Areas.

Achieve interim watershed-specific percent load reductions by 2032. Watershed-specific pollutants include zinc, *E. coli*, nitrogen, and PCBs/DDT. The advantage of the indicators is their simplicity and interim use; their purpose is not to demonstrate compliance with the MS4 Permit or attainment of final 2038 Countywide Target. It is merely an indicator to ensure that there is progress in the next few years towards reaching WQS attainment.

Action 1.1 – The County will establish Watershed Area load reduction targets based on estimates provided in MS4 Watershed Management Programs by end of 2025 (a 50% reduction can be assumed as default but should be adjusted for watershed-specific reduction needs). The method outlined in the October 7 Water Quality Workgroup presentation can be used, but at this point in time the targets will not be adjusted for SCWP contribution until data on efficacy by project type and costs is obtained.

Action 1.2 – The County, in coordination with the LA Water Board, will develop a method to directly measure attainment of interim load reduction targets that is based on modeled/estimated load reductions from projects as well as data from actual projects implemented.

Objective 2 (Priority Strategies) – Attain interim project-based performance targets in each of the nine Watershed Areas

Action 2.1 - Initial Watershed Plans should be modified by June 2026 to include priority strategies based on their ability to meet interim load reduction targets (in Objective 1). The Opportunity Analysis should prioritize strategies by land-use and geographic area, using existing WMPs and other relevant agency stormwater planning documents, when identifying opportunity areas in order to achieve load reductions.

Action 2.2 - The County's Watershed Area Planning Tool (Planning Map) should show where all SCWP-funded and other relevant projects have been or will be constructed (both regional and municipal funding) and present the pollutant load reductions designed to be achieved by these projects. Other relevant projects include all past constructed stormwater quality projects completed by agencies and other parties (e.g., Proposition O, CBO/NGO projects completed before and outside of the SCWP) since 2000.

Action 2.3 - The LA Water Board will develop guidance for WASCs, based on existing WMPs and the County's summary from Action 2.2, on how to select priority strategies to achieve interim load reduction targets and final water quality standards.

Objective 3 - Countywide Assessment and Adaptive Management Implementation Plan

The County should develop a Countywide Adaptive Management Implementation Plan within 2-3 years. This Countywide plan is in addition to the proposed "Adaptive Watershed Plans" due in 2026 under the current framework. The Countywide plan should be designed to achieve

the Countywide Target of meeting all water quality standards in receiving waters by 2038. The implementation plan will identify specific projects which align with the prioritized strategies to achieve this target, how progress will be assessed, and how progress will be reported back to the ROC.

Action 3.1 – Planning. The plan will include an initial assessment of existing data and quantitatively link the Watershed Area Targets (load reduction targets) and Priority Strategies (project-based targets) to the Countywide Target (all receiving water quality standards by 2038) so that correlations can be established between watershed area targets and receiving water quality standards to inform adaptive management at the County and watershed scale.

Action 3.2 – Assessment. The plan will include monitoring to assess project efficacy (using metric from Action 1.2), as well as receiving water quality (using MS4 and other data), to assess progress towards meeting interim load reduction targets and final water quality standards.

Action 3.3 – Reporting. The plan will include a procedure for reporting progress back to the ROC. The progress reports could be a synthesis of WARPs and other existing planning documents, including municipal program reports and dashboards. The reporting could also be integrated with WRAMPS to ease reporting burdens and avoid duplication of effort.

Action 3.4 – The LA Water Board will work with the County to provide MS4 and other relevant effluent and receiving water quality monitoring data to help with planning, assessment, and reporting.



Meeting Summaries 1 and 2

Date: 18 November 2024

From: Hayat Rasul, Mike Antos, Stantec

To: Safe Clean Water (SCW) Program Watershed Planning Team

Re: Interested Party Engagement Meeting Summary

Safe, Clean Water Program Watershed Planning

Regional Oversight Committee Water Quality Working Group Engagement October 7, 2024 & November 6, 2024

Working Group Members

Mark Gold, Natural Resources Defense Council and Safe, Clean Water Program Regional Oversight Committee Barbara Romero, City of Los Angeles and Safe, Clean Water Program Regional Oversight Committee Norma Camacho, Los Angeles Regional Water Quality Control Board and Safe, Clean Water Program Regional Oversight Committee Bruce Hamamoto, Los Angeles County Flood Control District, SCR & NSMB WASC Jenny Newman, Los Angeles Regional Water Quality Control Board Dawn Petschauer, City of Pasadena, Chair RH WASC Ken Susilo, Geosyntec Susie Santilena, City of Los Angeles, Co-Chair CSMB WASC, SSMB WASC Mark Lombos, Los Angeles Department of Public Works

Staff and Consultants Present:

Mike Antos, Hayat Rasul (Stantec) Melanie Morita-Hu, Justin Jones, Luis Perez, Jonpaul Sarro (SCWP Watershed Planning (WP), Los Angeles County Public Works) Rebecca Kaliff, Dustin Bambic (Paradigm) Raina Dwivedi (California Natural Resources Group)

Water Quality Working Group Meeting 1 – October 7, 2024

Discussion

Objectives

- 1. Review the recommendation shown at the September ROC meeting.
- 2. Describe and receive feedback about an alternative recommendation.
- 3. Discuss the proper balance between the indicators and metrics of the MS4 Permits and the watershed management groups, and the SCW Program indicators and metrics

The Working Group (WG) was refreshed on the Initial Watershed Planning approach shown at the September ROC meeting, constitutive of Water Quality (WQ) Opportunity Analysis and Targets. WG members raised concerns about potential confusion if different WQ targets are used for this program as compared to the MS4 Permits, particularly if the SCW Program were able to claim success at achieving its WQ targets while the MS4 WQ standards had not yet been attained.

It was highlighted that while good projects are being submitted, their cumulative WQ benefits are not being tracked in relation to regulated WQ standards attainment. The need for future investments to prioritize regulated contaminants was emphasized. It was acknowledged that the SCW Program alone will not achieve WQ standards attainment but is a crucial catalyst. The WG emphasized the importance of drawing funding from state and federal levels to join local and regional expenditures both in and outside the SCW Program.

Upon the WP Team presentation, which described an alternative approach that expands the number of pollutants used for Indicators and incorporates a method for quantifying the SCW Program contribution to Countywide targets (rather than a flat 50% reduction), the WG discussion emphasized that SCW Program Watershed Area targets must link to the Watershed Management Programs (WMPs) developed by MS4 watershed groups rather than solely adopting program-wide contaminant reduction targets. The WG suggested that legacy organic pollutants (DDTs and PCBs) and trash be added as WQ targets, even though very few WMPs list organic pollutants as limiting pollutants and even though trash is managed outside of WMPs in the MS4 Permit.

The WG shared that integrating ongoing monitoring data with SCW Program efforts is crucial, and noted the importance of planning, modeling, and designing effective metrics. The WG recommended that the Program aim to improve WQ by contributing to existing WQ requirements rather than developing targets focused solely on load reductions. They also acknowledged that there is a gap in consistency and integration between SCW Program goals and MS4 Permit, and avoiding duplicative or conflicting reporting by the MS4/WMP and SCW Programs is important.

Following the meeting, a document was shared with the Watershed Planning Team by members of the Working Group (see below, Addendum).

Action Items for Watershed Planning:

- Consider additional contaminant reduction targets, beyond the three proposed, to better capture the variability in regulated contaminants in the different watersheds management groups.
- Receive and consider proposed ideas in the follow-up document co-created by members of the Working Group.

Water Quality Working Group Meeting 2 – November 6, 2024

Discussion

Objectives:

- 1. Review the recommendation document shared by members of the WG.
- Continue to discuss the proper balance between the indicators and metrics of the MS4 Permits and the watershed management groups, and the SCW Program indicators and targets.

The meeting consisted of some general comments and discussion, followed with a focus on the three objectives in the document shared by the WG.

Members of the WG outlined an alternative method for developing WQ targets (Addendum, below), building off the approach initially shared by the SCW Program Watershed Planning (WP) Team. The WP Team discussed the overarching goal in the refined strategy shared by the WG, which suggests that SCW Program Initial

Watershed Planning **acknowledge larger regional targets** (i.e., full MS4 compliance by 2038) and suggested that smaller targets are not as meaningful as setting an aspirational and large-scale target. The WP Team emphasized the importance of anchoring WQ targets in the SCW Program Goal A – which is to "contribute to" attainment rather than setting targets that suggest the SCW Program is wholly responsible for attainment. With this approach, the WQ targets can mimic the Water Supply targets and establish a SCW Program contribution to the Countywide targets while also estimating the additional reductions that would be needed by other programs to achieve the Countywide targets.

The WG acknowledged that SCW Program was not solely responsible for the investments necessary to achieve compliance and expressed understanding that the Initial Watershed Plans are identifying countywide targets and then evaluating the appropriate SCW Program contribution towards those targets. The WG noted that they would like to see more synchronicity across County water planning efforts. The WG also reiterated the importance of including DDTs/PCBs but acknowledged that trash is unique and managed under separate mechanisms by the MS4 Permit. The WP Team noted that quantifying DDTs / PCBs and trash is more challenging compared to nutrients, metals and bacteria and data gaps may need to be addressed to fully incorporate DDTs/PCBs and trash as Indicators. The WG suggested that projects should be performance-based, and the term "compliance" should be replaced with "attainment" to better measure progress towards SCW Program goals rather than just MS4 Permit compliance.

Regarding implementation, the WP Team added that the Initial Watershed Plans will work with the Stormwater Investment Plans (SIPs), so WASCs can make more informed decisions when evaluating projects. The WG acknowledged that the SCW Program Initial Watershed Plans will not identify specific projects, rather, it will provide opportunity areas and targets that will support project development, and the development of both SIPs and Municipal Annual Plans. The WG shared the desire to more directly support implementation of projects that lead to achievement of WQ targets. Some members of the WG felt the WASCs can be given stronger direction and strategies along with the Initial Watershed Plans for decision making in the coming fiscal years. The WP Team acknowledged that full Adaptive Plans may be needed to more clearly identify the set of specific actions/targets that lead to WQ attainment. The WG suggested a Countywide Implementation Plan be developed, but that is not currently planned. The WG highlighted the importance of "rolling up" the nine Initial Plans (and eventually, Adaptive Plans) into a Countywide summary, rather than only having nine separate plans. The WG also highlighted the importance of identifying the additional efforts that are needed beyond the SCW

Program to achieve Countywide and Watershed Area targets, so that a comprehensive Countywide vision of WQ needs is presented to the public.

The WG emphasized the need to leverage both modeling and monitoring data for program assessment. The WG discussed the use of modeling and monitoring for program assessment, and it was suggested that both have key roles for assessment and adaptive management (rather than solely using monitoring or modeling). The WP Team noted that Initial Plans will largely be based on modeling, and monitoring can be incorporated during assessment/adaptive management/ Adaptive Plans. The type of monitoring needed was discussed and it was acknowledged that WMP Groups currently undertake extensive receiving water and outfall monitoring across the County, and post-construction project monitoring is built into the SCW Program transfer agreements. The WG suggested that additional monitoring stations may or may not be needed in the future to support assessment of achievement of Watershed Area targets.

Implications for Watershed Planning:

- Build upon the approach presented at the October WG meeting and consider key adjustments, including:
- o adding additional pollutants (PCBs/DDTs and perhaps trash);
- including the year 2038 as a timeline for achieving Countywide WQ targets plus interim targets;
- incorporating monitoring as a part of program assessment and adaptive management;
- ensuring a Countywide summary is presented based on the nine Watershed Area plans;
- highlighting how future Adaptive Planning could support identification and funding of specific projects that could strategically/cost-effectively achieve WQ targets; and
- clearly illustrating the overall efforts needed to achieve Countywide targets (not just SCW Program).
- Consider how SCW Program post-construction project monitoring can synchronize with receiving water and outfall monitoring programs required by the MS4 Permit, and whether additional monitoring is needed by SCW Program in the future to support assessment and adaptive management.

• Consider how to report progress toward SCW Program WQ targets in a manner that avoids confusion of audiences that are also tracking MS4 Permit reporting by permittees and the Regional Board.

Memorandum

From: Regional Oversight Committee Water Quality Working Group

For: Watershed Planning

Date: October 24, 2024

<u>The following is the initial unedited document co-created by members of the</u> <u>Working Group that was shared with Public Works Watershed Planning</u> <u>Team. Formatting, fonts, font color, tracked changes shown, and comments,</u> <u>have been retained from the document provided.</u>

October 24, 2024

ALTERNATIVE APPROACH FOR DEVELOPING WATER QUALITY TARGETS FOR SCWP WATERSHED PLANNING

General comment: LASAN supports efforts to develop goals and metrics for the SCWP Watershed Plans that help to focus resources on water quality issues. We have a few questions and suggestions for this alternative approach, detailed below in red comments and tracked changes.

Background

The October 7 Water Quality Workgroup participants provided feedback on the County's proposed approach for developing water quality targets for watershed planning, including:

- Targets need to be based on attainment of water quality standards in receiving waters on a watershed basis,
- Targets should help WASCs strategically prioritize projects on the front end, not just measure success on the back end, to avoid scattershot project implementation,
- Watershed planning needs to build on previous efforts such as the LA County Water Plan and MS4 WMPs and other relevant agency stormwater planning efforts and use the existing tools in these plans,

LASAN comment: In addition to MS4 WMPs, watershed planning should also include other relevant agency stormwater planning efforts, such as the City of Los Angeles' Watershed Investment Strategic Plans

- Targets need deadlines,
- Targets should be developed and expressed spatially, and
- Targets can assume contributions from contribution of other funding sources there's no need to isolate SCWP contribution in setting or measurement of targets.

LASAN comment: We disagree with the bullet that says "...– there's no need to isolate SCWP contribution in setting or measurement of targets." There is a benefit and a need to estimate what the program can realistically accomplish. Highlighting the program's limitations will give the public and WASCs realistic expectations of the program. This will communicate to WASCs the need to focus and give priority to effective water quality projects, quantify the shortfall between the overarching goal and what the program can do, and identify/quantify needs for other resources to be leveraged to fill that gap.

The following alternative approach is proposed to address this feedback.

Alternative Water Quality Targets and Watershed Planning Approach

Overarching goal – Meet water quality standards in all receiving waters directly impacted by dry weather and stormwater runoff by 2038.

Objective 1 – Attain interim load reduction targets in each of the nine Watershed Areas

Achieve 50% reduction in watershed-specific pollutants by 2032^[1]. Watershed-specific pollutants include zinc, *E. coli*, nitrogen, and PCBs/DDT^[2]. The advantage of the indicators is their simplicity and interim use; their purpose is not to demonstrate attainment of final 2038 goal.

LASAN comment: Objective 1 "Achieve 50% reduction in watershed-specific pollutants by 2032" needs more clarity. What is the basis of the 50%? Is this a goal of 50% reduction in receiving water loading overall, or 50% progress toward Program goals? What are the specific parameters for each watershed to be achieved? It should be based on the summation of the specific water quality needs and should consider opportunities in individual watershed areas. Given the universal acknowledgement that the SCWP does not on its own have enough funding to attain water quality standards by 2038, pollutant reductions should be WASC-

specific. This will promote the implementation of the right projects in the right places (not more or less than what is needed for water quality standards attainment).

Action 1.1 – The County will establish Countywide and Watershed Area load reduction targets. The method outlined in the October 7 Water Quality Workgroup presentation can be used, but Countywide load reduction targets should not be adjusted for SCWP contribution.

Action 1.2 – The County will develop a method to directly measure <u>attainmentcompliance</u> with interim load reduction targets that is not based <u>solely</u> on modeled/estimated load reductions from projects.

Objective 2 – Attain interim project-based performance targets in each of the nine Watershed Areas

WASCs will implement strategic projects to meet interim load reduction targets in each of the nine Watershed Areas. Short- and medium-term projects (i.e., before 2038) will be prioritized by land-use and geographic area to achieve interim load reduction targets and final water quality standards, based on existing WMPs.

Action 2.1 - The County will summarize via GIS where all SCWP funded projects have been or will be constructed (regional and municipal funding) and will present, by Watershed Area, the volume and pollutant load reduction designed to be achieved by these projects.

LASAN comment: To do true regional planning, the County should take into account all past constructed stormwater quality projects completed by agencies and other parties (e.g. Proposition O, CBO/NGO projects completed before and outside of the SCWP) to ensure funds are not being used in areas that already have a completed project.

Action 2.2 - The LA Water Board will develop guidance for WASCs, based on existing WMPs and the County's summary from Action 2.1, on how to set short- and medium-term pollutant reduction priorities to achieve interim load reduction targets and final water quality standards.

Action 2.2 - WASCs will use their WMPs and LA Water Board guidance to include short- and medium-term priorities for project implementation as a section within their Initial Watershed Plans.

Action 2.3 - Watershed Coordinators shall use the WASC Initial Watershed Plans to solicit applications for specific priority projects identified in the plans.

(10/24/24 comment by Jenny Newman, attached to "plans" in Action 2.3 above: Consider how to integrate this project prioritization with SCWP scoring criteria or find another way to encourage prioritized projects. Consider set aside for prioritized projects in addition to the current community grant solicitation process.)

Objective 3 - Countywide Implementation Plan

The Countywide Implementation Plan will be designed to achieve the overarching goal of meeting water quality standards in receiving waters by 2038 and will incorporate the WASC Initial Watershed Plans. The Countywide plan will include a monitoring plan to assess project efficacy (using metric from Action 1.2), as well as receiving water quality (using MS4 and other data), to assess progress towards meeting interim load reduction targets and final water quality standards.

Action 3.1 – The LA Water Board will work with the County to provide MS4 and other relevant effluent and receiving water quality monitoring data to assess project efficacy and receiving water quality.

^[1] Load reductions can be adjusted to reflect specific WMP estimates.

^[2] Compliance deadlines for trash have passed, and so trash is not included as an indicator, but compliance must be achieved as soon as possible.