

2024–2029

RACIAL EQUITY ACTION PLAN

SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD



Santa Ana Water Board Racial Equity Action Plan (September 2024 to June 2029)

1. Introduction and Purpose:

On March 15, 2024, the Santa Ana Water Board adopted Resolution R8-2024-0029 entitled, 'Condemning Racism, Xenophobia, Bigotry, and Racial Injustice and Strengthening Commitment to Racial Equity, Diversity, Inclusion, Access, and Anti-Racism in the Santa Ana Region' (Resolution); this Resolution sets forth certain commitments that the Santa Ana Water Board will do to advance racial equity and environmental justice. This action plan is intended to provide the Santa Ana Water Board staff with detailed actions or tasks to address the racial inequities and environmental injustices internally within the region's workforce practices, and externally through the water quality programs administered by the region.

This action plan is designed to support the Water Board's mission 'to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.' The Resolution adds that it is the desire and responsibility that the Santa Ana Water Board envision that the programs are to be executed where:

- race no longer predicts a person's access to, or quality of water resources;
- Santa Ana Water Board employees at all organizational levels reflect the racial and ethnic diversity of California;
- a racial equity lens is consistently applied to Santa Ana Water Board's decision-making processes; and
- an intersectional lens, in which we examine multiple layers of inequality that effect an individual, is used when addressing environmental inequities in our region.

The Resolution lists four strategic objectives that are intended to guide the effort to advance racial equity within the Santa Ana River Watershed. These strategic objectives are:

- 1) Integrating Racial Equity, Measuring Impact: Infusing the racial equity resolution throughout the Santa Ana Water Board's policies, programs, and practices; measuring progress toward goals and adapting when necessary.
- 2) Creating and Maintaining Spaces for Inclusion and Belonging: Addressing internal and external representation of Black, Indigenous, and People of Color (BIPOC) at the Santa Ana Water Board; elevating overall understanding of racial equity.
- 3) Activating BIPOC Community Wisdom: Fostering open communications for voices of BIPOC communities as well as incorporating wisdom from BIPOC communities in our decision-making processes.
- 4) Sharing Power and Knowledge with Communities: Offering ongoing training and dedicated resources to raise awareness of the Santa Ana Water Boards' role in managing the state's

water resources; cultivating authentic relationships that empower communities as partners for racial equity.

This action plan will be used to guide the Santa Ana Water Board staff with the execution of their programs over the next five years, so that progress is made toward the future of fairly applied regulatory oversight and requirements. The structure of the action plan includes the description of the strategic objectives, the supporting goals for each strategic objective, then followed by specific tasks to meet the goals. The tasks are listed in the tables below along with the assigned Santa Ana Water Board water quality programs and teams, the priority of the task and how to measure success. This action plan is intended to be a document that covers the next five years of activities, however, as we move forward, we may determine a better approach or practice, and we may choose to adjust the action plan as needed before five years. But first, the Santa Ana Water Board has several water quality programs and teams and their approaches to address racial equity may vary, these programs are briefly summarized in Section 2.0 of this plan.

2. Santa Ana Water Board Water Quality Programs and Teams:

- a. **Racial Equity Team (RET):** The Santa Ana Water Board has a Racial Equity Team comprised of volunteers across the organization that provide information and analyses of the region's effort towards addressing racial equity and environmental justice concerns in the region. The executive managers for the region will support and use the Racial Equity Team; where they will lead the effort to implement the Santa Ana Water Board Racial Equity Resolution, and leading the commitments related to both internal and external office-wide actions.
- b. **Administrative Service and IT Support Team (SupT):** The Administrative Services section and the IT staff provide support for all office staff. This group will be responsible for providing the support for office-wide actions related to human resources management, office website, social media, and logistics of community involvement and events.
- c. **Underground Storage Tank Program (UST):** The Underground Storage Tank (UST) Program addresses leak prevention, oversight of leaking petroleum UST cleanups, and reimbursement to responsible parties conducting cleanups. Board staff are primarily involved with the oversight of environmental investigation and remediation of petroleum releases from USTs. Currently, Board staff is actively directing the cleanup work at approximately 96 leaking UST sites. According to the State Water Resources Control Board's (State Water Board's) GeoTracker database, over 800 UST releases have been investigated, remediated, and closed at the direction of the UST staff. In addition, Board staff provide support to Local Oversight Programs related to the assessment and cleanup of releases from petroleum USTs. Board staff also review environmental reports submitted following petroleum UST removal activities to determine if a petroleum release has occurred that will require further investigation under Board oversight.

- d. Site Cleanup Program (SCP):** The Site Cleanup Program (SCP) is responsible for the regulatory oversight of environmental investigation and remediation efforts across hundreds of contaminated sites within our region. The contaminated sites under oversight of the SCP range from industrial facilities of varying scales to dry cleaners and plating operations. Historical operation at the subject facilities have resulted in discharging hazardous chemicals such as volatile organic compounds (VOCs), petroleum hydrocarbons, 1,4-dioxane, per- and polyfluoroalkyl substances (PFAS), and chromium VI, etc. to soil and groundwater. The SCP prioritizes the assessment for and mitigation of potential vapor intrusion (VI) in sites impacted with VOCs, recognizing the critical potential risk of direct exposure on human health. Board staff oversee implementation of mitigation measures with a commitment to protect the well-being of affected communities. Additionally, the program plays an important role in executing Proposition 1, the *Water Quality, Supply, and Infrastructure Improvement Act*, which is administering \$670 million in grant funding through the State Water Resources Control Board for the statewide Groundwater Sustainability Program. There are seven Proposition 1 grant-funded projects totaling approximately \$73.8 million within the Santa Ana Region. This funding is allocated to the planning and implementation of measures to prevent and cleanup contamination of groundwater that serves (or has served) as a source of drinking water.
- e. Land Disposal Program (LD):** The Land Disposal Program protects water quality by regulating discharges to land of solid and liquid wastes. These wastes include municipal solid waste, hazardous wastes, designated wastes (such as petroleum-impacted soils), nonhazardous and inert solid wastes. In general, these wastes cannot be discharged directly to the ground surface without impacting groundwater or surface water and, therefore, they must be contained at facilities that prohibit wastes from migrating to groundwater. These facilities are regulated pursuant to Title 27 (nonhazardous wastes) or Chapter 15 of Title 23 of the California Code of Regulations (hazardous wastes), and the State Board General Orders for composting facilities and emergency debris. There are 73 regulated facilities including landfills, surface impoundments and composting facilities. In addition, staff provide oversight for the cleanup activities at facilities that had releases; as well as oversight for the post-closure monitoring, maintenance and development activities at closed land disposal facilities.
- f. Compliance and Enforcement Program (ENF):** The State Water Resources Control Board and the nine Regional Water Quality Control Boards protect the waters of the state by ensuring compliance with clean water laws and taking enforcement actions when violations occur. The Water Boards have authority under the Water Code to regulate and enforce any activity or factor that may affect the quality of the Waters of the State. The Water Boards' compliance and enforcement actions are guided by the State Water Board's 5 October 2017 Enforcement Policy and the Santa Ana Water Boards' Enforcement Priorities that are reviewed and adopted annually.
- g. South Coast Cannabis Program (CAN):** The South Coast Regional Cannabis Program (Cannabis Program) regulates waste discharges associated with cannabis cultivation and

related activities on behalf of the Santa Ana, San Diego, and Los Angeles Regional Water Quality Control Boards. Cannabis Program staff implement the statewide *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (Cannabis General Order) and the *Cannabis Cultivation Policy: Principles and Guidelines for Cannabis Cultivation* (Cannabis Policy), through various permitting, compliance, and enforcement actions. Cannabis Program staff coordinate and engage in multi-agency regulatory and remediation efforts, primarily with the Department of Cannabis Control, the California Department of Fish and Wildlife, local law enforcement agencies, and county code enforcement.

- h. Concentrated Animal Feeding Operations Program (CAFO):** The Santa Ana Region is home to approximately 75 dairy and dairy-related facilities currently regulated under Order Number R8-2018-0001, *General Waste Discharge Requirements for CAFOs (Dairies and Related Facilities) within the Santa Ana Region*. In addition, the Santa Ana Water Board adopted individual waste discharge requirements, Order Number R8-2021-0019, *Waste Discharge Requirements for the Los Alamitos Race Course*, to regulate the equestrian facility in Orange County. There are several other non-dairy animal feeding operations in the Santa Ana Region that are unregulated at present, these include equestrian, poultry, and other animal facilities that do not meet the federal National Pollutant Discharge Elimination System (NPDES) regulatory definitions of a CAFO.
- i. Non-Point Source Program (NPS):** Non-point source (NPS) pollution is a significant contributor to water quality impairments in California. The primary non-point sources of pollution in the Santa Ana region include agriculture and urban runoff. The Santa Ana Water Board's NPS Program works to leverage resources, such as the United States Environmental Protection Agency's 319(h) grant program, to restore waters impacted by NPS pollution and protect unimpaired water bodies by assessing problem sources and implementing management programs consistent with the statewide California Non-point Source Program Implementation Plan for 2020-2025 (Five-Year Implementation Plan).
- j. Irrigated Lands Regulatory Program (ILR):** The Irrigated Lands Regulatory Program (ILRP) regulates operations located within the San Jacinto River watershed, under Order No R8-2023-0006, *General Waste Discharge Requirements for Discharges of Waste from Irrigated Lands in the San Jacinto River Watershed, Riverside County (Ag Order)*, in an effort to protect the beneficial uses of surface and groundwater. There are approximately 18,000 irrigated acres located within the San Jacinto River watershed. Crops grown in the San Jacinto River watershed include citrus, alfalfa, wheat, corn silage, hay forage, oats, various fruits and vegetables, and herbs.
- k. Stormwater Program (SW):** The Stormwater Program implements NPDES requirements established by the State Water Board and Santa Ana Water Board to regulate the discharge of pollutants in stormwater to waters of the U.S. The program is divided into three main areas of activity: construction (including Caltrans projects), industrial, and municipal. The permits require implementation of Best Management Practices (BMPs) and other program elements and controls to minimize the discharge of pollutants and require visual and

chemical monitoring. Santa Ana Water Board staff review monitoring and other program reports, conduct compliance inspections and audits, and conduct enforcement activities as needed. Since many of the industrial facilities that are regulated by the Stormwater Program are found in disadvantaged communities and communities of color, much of the work of the Stormwater Program currently focuses on enforcement within environmental justice communities.

- i. Wastewater Program (WW):** The Wastewater Section administers and implements the waste discharge requirements (WDRs) or non-chapter 15 program to regulate discharges of waste to land, the combined WDRs and National Pollutants Discharge Elimination System (NPDES) program to regulate discharges of waste to surface waters, the federal and state pretreatment programs to regulate indirect discharges of waste from industrial and commercial sources to sanitary sewer systems, the production and distribution of recycled water for non-potable and indirect potable reuse, the oversight of enrollees under statewide general WDRs order for sanitary sewer systems for our region, the statewide Onsite Wastewater Treatment System (OWTS) policy to regulate septic tanks in our region, and various miscellaneous statewide or regional general WDRs orders and/or NPDES permits, such as the De Minimis discharge, aquatic pesticides application, electrical vaults dewatering, selenium and nutrient TMDL implementation for the Newport Bay watershed, drinking water system discharges, groundwater cleanup site waste discharge, and winery waste discharge. In addition, the staff administers the CIWQS database and billing for our region.
- m. Recycled Water Program (RW):** The Uniform Statewide Recycling Criteria was established for the protection of public health and is codified in the California Code of Regulations, title 22, division 4, chapter 3. The Recycled Water Program addresses critical statewide water supply needs through increasing recycled water use in accordance with the Recycled Water Policy. Program staff plan and permit new water supplies through permitting new water supplies from recycled water projects in accordance with the California Water Code Sections 13260 and 13370, and the Federal Clean Water Act Section 402.
- n. 401 Water Quality Certification Program, Discharges of Dredged or Fill Materials (D&F):** The 401 Water Quality Certification and Waste Discharge Requirements program regulates the removal or placement of fill materials in waters of the state, including wetlands. Examples of such projects include navigational dredging, flood control channelization, levee construction, channel maintenance and stabilization, fill of waters of the state for development, installation and/or repair of bridge piers, docks, roads, utility structures and habitat restoration projects. These projects generally require a Clean Water Act Section 401 Water Quality Certification or Waste Discharge Requirements under the Porter-Cologne Water Quality Act to ensure the projects will be constructed in a manner that is protective of water quality.
- o. Regional Planning Program (RP):** The Water Quality Control Plan or “Basin Plan” prescribes the water quality objectives/standards for ground and surface waters in the region covering the Santa Ana River Watershed in Orange, Riverside, and San Bernardino counties. The

Basin Plan identifies beneficial uses of surface and ground waters, prescribes water quality objectives to protect those uses, implementation actions to achieve objectives, and describes monitoring and surveillance program.

- p. Total Maximum Daily Loads Programs (TMDL):** The Federal Clean Water Act Section 303(d) requires that States identify waters that do not or are not expected to meet water quality standards, support designated beneficial uses, and are inconsistent with the antidegradation policy with the implementation of technology-based controls. Once a waterbody has been placed under category 5 of the 303(d) list of impaired waters, states are required to develop a Total Maximum Daily Load (TMDL) to address each pollutant causing impairment. A TMDL defines how much of a pollutant a waterbody can tolerate and still meet water quality standards. Each TMDL must account for all sources of the pollutant. TMDLs allocate allowable pollutant loads for each source, and identify management measures that, when implemented, will assure that the water quality standards are attained. The Santa Ana Water Board's TMDL Program includes TMDL projects for both inland and coastal waters. The Inland Waters TMDL Program has existing TMDLs for nutrients in Lake Elsinore and Canyon Lake, bacteria in the Middle Santa Ana River, and nutrients in Big Bear Lake. The Coastal Waters TMDL Program includes multiple TMDLs for bioaccumulative and toxic constituents (organochlorines compounds, selenium, organophosphate pesticides, copper, chlorpyrifos and diazinon), sediment, nutrients, and bacteria (fecal coliform) for the Newport Bay watershed.

3. Strategic Objectives, Goals, and Tasks:

Strategic Objective 1: Integrating Racial Equity, Measuring Impact: Infusing the racial equity resolution throughout the Santa Ana Water Board's policies, programs, and practices; measuring progress toward goals and adapting when necessary.

To accomplish this objective the Santa Ana Water Board staff plans to look at the region-wide efforts and its programs through a racial equity lens, and use the tools created by the State Water Board and Santa Ana Water Board staff to help re-examine our priorities and adjust our approach, as needed. Initially, we need to make connections with our communities, and determine their areas of concern with our water quality programs. The two goals are listed below:

- Goal 1A: Water Board data are accessible, equitable and culturally relevant.
- Goal 1B: Programs and policies are evaluated and realigned to address racial injustices.

The following tables are the specific tasks that we have identified to meet the goal and ultimately the Strategic Objective 1.

Goal 1A: Water Board data are accessible, equitable and culturally relevant.

No.	Task	Programs & Teams	Timing	Measuring Success
1A-1	<u>Racial Equity Team</u> : This team will lead the effort to implement the Santa Ana Water Board Racial Equity Resolution, and leading the commitments related to both internal and external office-wide actions. Create continuity across the region.	RET	On going	Regular Meetings, Completed Tasks
1A-2	<u>Develop Racial Equity Toolkit</u> : Develop a Region-specific racial equity toolkit for staff to use in their daily decision making.	RET	1/15/25	Toolkit in Place and On Website
1A-3	<u>Database Utilization</u> : Program management will ensure that program staff have been trained on the availability and use of GeoTracker tools and layers presenting CalEnviroScreen scores and demographics of communities surrounding SCP sites. Using these tools, UST and SCP staff will record the CalEnviroScreen scores and GeoTracker site status to evaluate cleanup progress relative to burdened communities.	UST SCP	1/15/25	Hold and Track Regular Internal Training Sessions
1A-4	<u>Social Media</u> : The State Water Board’s social media platform can be used, while the region establishes a social media presence to provide program activities and information.	RET	1/15/25	Track Usage
1A-5	<u>Integrated Report Criteria</u> : Incorporate racial equity analysis into the 305(b)/303(d) Integrated Report to identify impacted waters in BIPOC and disadvantaged communities, starting by identifying data gaps. The Integrated Report is a document with a comprehensive review of surface water quality and includes a list of currently impaired water bodies by pollutant type. Uses data from 1A-3.	TMDL	1/15/26	Criteria in Place

Goal 1B: Programs and policies are evaluated and realigned to address racial injustices.

No.	Task	Programs & Teams	Timing	Measuring Success
1B-1	<u>Public Outreach Resources:</u> Need to have the equipment and resources to have a Santa Ana Water Board booth. Have a group that is willing to assist with fact sheets, flyers, announcements for all programs. Assist with applying for or acquiring funding toward racial equity and environmental justice events, etc. (AB2108 requirements).	RET	1 st on 6/30/25 Annual Review	Identify Needs and Annual Review
1B-2	<u>Connect with Others:</u> Connect with other regions/ outside agencies and their racial equity and environmental justice programs to share knowledge. Using the toolkit in 1A-2.	All	6/30/25	Document and Report Actions
1B-3	<u>Identify Stalled Cases:</u> Identify stalled cases in high scores using CalEnviroScreen and/or Climate and Economic Justice Screening Tool (CEJST) to prioritize efforts to move stalled cases toward closure. Using the data from 1A-3.	UST	1/15/26	Document and Report Actions
1B-4	<u>Regular Water Boards’ Discussions:</u> MCC/DMC meetings will have updated on the actions identified in the Racial Equity Action Plan and gauge where more support is needed.	RET	On Going	Document and Report Actions – MCC/DMC Meetings
1B-5	<u>Align with State Water Boards’ Program:</u> As appropriate, ensure that priorities and actions within the State Water Board’s annual Strategic Plan align with the region’s action plan.	RET	Annual Review	Document and Report Actions
1B-6	<u>Climate Change Assessment Plan:</u> Develop an approach to address climate change impacts and how they may potentially disproportionately impact BIPOC communities or interests. An internal team will be considered to write the plan. Uses data collected from 1A-2, and work initiated with the basin planning staff.	RET and Basin Planning	6/30/27	Plan Developed

Strategic Objective 2: Creating and Maintaining Spaces for Inclusion and Belonging: Addressing internal and external representation of BIPOC at the Santa Ana Water Board; elevating overall understanding of racial equity.

To accomplish this objective the Santa Ana Water Board needs to assess the internal office practices and the external program-specific practices to create opportunities to discuss and

learn actions that can be taken or changes to create opportunities for inclusion. Initially, we will follow the State Water Board’s guidance document entitled “Immediate Action Plan for Advancing Workforce Diversity” to adjust the region’s human resources practices. And for the external practices, we have included the State Water Board’s guidance related to AB2108 and from the racial equity training we received through the State Water Board’s training programs.

The two goals are listed below:

- Goal 2A: Water Boards staff and leadership reflect the diversity of the Region.
- Goal 2B: Foster a culture of inclusion and belonging.

The following tables are the specific tasks that we have identified to meet the goal and ultimately the Strategic Objective 2.

Goal 2A: Water Boards staff and leadership reflect the diversity of the Region.

No.	Task	Programs & Teams	Timing	Measuring Success
2A-1	<u>Panelist Training Requirement</u> : Require hiring managers and interview panelists to have expertise on implicit bias or racial equity.	All	On Going	Training List
2A-2	<u>Recruitment Checklist</u> : Develop a recruitment checklist that at a minimum includes a diversity statement on the vacancy announcement, and establish model diversity questions, and other items to be included.	All	1/15/25	Checklist
2A-3	<u>Update the Santa Ana Water Board Website</u> : Update the Santa Ana Water Board’s website to include additional guidance for prospective applicants on how to navigate the state’s hiring process, with a focus on successfully applying for Water Board positions.	SupT	Quarterly Review	Document Meetings and Action Items
2A-4	<u>Target Recruitment Efforts</u> : Increase recruitment for job openings and internship opportunities at high schools, community colleges, colleges, universities, workforce development networks, diverse professional associations, and community-based groups that serve BIPOC communities in California. Collaborate with other Regional Water Boards and the State Board on future recruitment efforts.	All	On Going	Event List

2A-5	<p><u>Racial Equity Recruitment and Retention Strategy</u>: Based on success in Task 2A-4, develop a long-term diversity and equity recruitment and retention strategy that: creates a community/academia-to-Water Boards pipeline; creates equitable opportunities for BIPOC staff to apply for promotions; explores opportunities to expand available job classifications; and enhances staff engagement and satisfaction. Incorporate the strategy into the Santa Ana Water Board’s workforce and succession plans. Uses the following identified on 1A-4.</p>	RET	6/30/25	Plan in Place
2A-6	<p><u>Training and Inspections</u>: We will incorporate implicit bias training for stormwater inspectors on a regular basis. Inspectors will become aware of their own bias and the ways that bias can be harmful in interactions with permittees and the public and in regulatory decision making.</p>	SW	6/30/25	Training List

Goal 2B: Foster a culture of inclusion and belonging.

No.	Task	Programs & Teams	Timing	Measuring Success
2B-1	<p><u>Mentoring Program/Cross Training/e-mentoring</u>: Develop a mentorship program that allows employees, including BIPOC staff, to connect with others who may have similar experiences and provide coaching on career growth and advancement. RET will create opportunities for staff to meet and interested groups identified in 2B-2 will be encouraged to meet.</p>	RET	1/15/26	List of Mentoring Actions
2B-2	<p><u>Staff Support Groups</u>: Support the development of a staff-led framework for Water Board affinity groups and support employee participation and leadership. Support employee participation and leadership in CalEPA affinity groups. Using the interested staff from 2B-1.</p>	All	Start in 2026	List of Groups
2B-3	<p><u>Roundtable Discussions</u>: Update roundtable (RT) charters or workplans to include racial equity and include racial equity discussions as a standing agenda item on roundtables.</p>	RT Reps	On Going	RT Leads to Provide Status Reports
2B-4	<p><u>Plain Language</u>: We will strive to use plain language in our written communications, so they are useful and informative to stakeholders</p>	All	On Going	Documents

	with diverse levels of educational attainment. Unit supervisors will require program staff to complete plain language training. Staff will learn to use tools to evaluate their written products and editing techniques to objectively increase their readability.			
2B-5	<u>NPS Outreach</u> : NPS Program staff will work to identify communities that have suffered disproportionate socio-economic burdens and racial inequality through multiple avenues, including reaching out to local Resource Conservation Districts and tribal liaisons and using county census data and the Office of Environmental Health Hazard Assessment’s CalEnviroScreen tool. NPS Program staff will advocate for the prioritization of implementation efforts in the 2020-2025 Five-Year Implementation Plan for communities based on racial equity and environmental justice concerns, and promptly prioritize potential funding opportunities for controlling human health exposure. Increased outreach efforts will be prioritized for the identified communities to solicit additional input for the upcoming Non-point Source Program Implementation Plan update for 2025-2030. Uses results from 1A-2 and 1A-4.	NPS	On Going	Plan in Place
2B-6	<u>San Jacinto Outreach</u> : Consistent with the goals of the Non-point Source Program, ILRP staff will work to identify communities within the San Jacinto River watershed that have suffered disproportionate socio-economic burdens and racial inequality and advocate for continued outreach efforts. This effort will guide outreach efforts for the identified communities to solicit additional input for the upcoming Non-point Source Program Implementation Plan update for 2025-2030, which includes the ILRP. Uses results from 1A-2 and 1A-4.	ILR	On Going	Plan in Place
2B-7	<u>Initiate Communications with Tribes</u> : Initiate communication with Tribal environmental and water programs to improve understanding, education, and collaboration. Uses connections identified in 1B-1 and 1B-2.	RET	6/30/27	List of Actions Taken

2B-8	<p><u>Initiate Communications with Local Governments and Interested Persons:</u> Initiate communication with local governments’ environmental and water programs in disadvantaged communities to improve understanding, education, and collaboration. Uses connections identified in 1B-1 and 1B-2.</p>	RET	6/30/27	List of Actions Taken
2B-9	<p><u>Internal Water Boards’ Training:</u> Regarding racial equity and environmental justice developments, successful outreach programs, project or funding opportunities, and success stories and lessons learned, (1) providing racial equity, diversity, inclusion, and environmental justice training as developed by the State Water Board, (2) educating staff about Equal Employment Opportunity (EEO) laws and the Water Boards’ EEO-Office’s process for preventing and responding to complaints of discrimination, harassment, bullying, or retaliation, (3) working closely with the State and other Regional Water Boards to develop policies that will lead to a racially equitable and diverse workforce by ensuring the Water Boards’ Immediate Hiring Practices Action Plan addresses recruitment, schools, and leadership development, and 4) partnering with other organizations to expend opportunities for community capacity building.</p>	RET	On Going	Training List and Results Review

Strategic Objective 3: Activating BIPOC Community Wisdom: Fostering open communications for voices of BIPOC communities as well as; incorporating wisdom from BIPOC communities in our decision-making processes.

To accomplish this objective the Santa Ana Water Board needs to accomplish some of the tasks identified in Strategic Objectives 1 and 2. The Santa Ana Water Board staff has initiated several actions to start meaningful conversations with the BIPOC communities, however, they have not advanced to the point of meeting this objective. There are also a handful of projects that have been raised to our attention from initial outreach to BIPOC communities; to meet this objective communication and connection needs to occur on a regular basis where we know the agencies and persons desiring to communicate with the Santa Ana Water Board about our water quality programs. The two goals set to meet this objective are listed below:

- Goal 3A: Engage with BIPOC communities by providing effective language access services and accessible communications.

- Goal 3B: Remove barriers for community access and participation in water decision-making by providing resources for capacity building, including funding, training, and education.

The following tables are the specific tasks that we have identified to meet the goal and ultimately the Strategic Objective 3.

Goal 3A: Engage with BIPOC communities by providing effective language access services and accessible communications.

No.	Task	Programs & Teams	Timing	Measuring Success
3A-1	<p><u>Identify External Partners</u>: Work with other external organizations that are willing to assist with information distribution, or event practices. Uses the results of 1B-1, 1B-2, 2B-7, and 2B-8.</p>	All	6/30/2028	List of Partners/ Com Log
3A-2	<p><u>Regular Board Briefings</u>: At each regular board meeting, the status of the implementation of the Resolution and this racial equity action plan will be discussed.</p>	RET	Standing Board Item	Board Staff Reports
3A-3	<p><u>AB 2108 Compliance</u>: Implement AB 2108 by using racial equity data to identify potential environmental justice water quality impacts, engage with communities potentially impacted, and develop findings based on data and outreach; and Identify Language requirements. Uses the results of 1B-1, 1B-2, 2B-7, and 2B-8.</p>	All	On Going	Public Outreach Activities
3A-4	<p><u>UST Program Outreach</u>: UST program staff, in collaboration with the State Water Board’s Office of Public Participation, will also develop revisions to public outreach guidelines to incorporate “equitable, culturally relevant community outreach to promote meaningful civil engagement” from those communities where remedial action plans and site closures are going to be considered by the Board, consistent with the requirements of AB 2108. Specific to the UST program, outreach efforts shall acknowledge if a large percentage of UST sites are owned and operated by a specific</p>	UST	On Going	Public Outreach Activities

	community, and therefore “culturally relevant community outreach” will include language assistance provided in languages spoken by that community. Uses the results of 1B-1 and 1B-2.			
3A-5	<u>Equitable Community Engagement</u> : Ensure meaningful involvement and representation of all affected communities, particularly those historically marginalized or disproportionately impacted by environmental hazards by developing and using public participation plans prepared for SCP cases. Engage with diverse communities in decision-making processes related to site cleanup, provide accessible information, and consider community preferences and concerns by conducting community outreach, at a minimum during project milestones in the form of community meeting and/or factsheets in dominant language(s) spoken within the impacted communities. This ensures that the cleanup efforts prioritize the needs and health of all communities, including those most affected. Uses the results of 1B-1 and 1B-2.	SCP	On Going	Public Outreach Activities
3A-6	<u>CEQA Reviews</u> : In reviewing CEQA documents for new land disposal projects, program staff support local governments in their efforts to address environmental impacts and community concerns associated with such projects, including odor, noise and traffic that may disproportionately affect disadvantaged communities (DACs) and tribes. Further, in review comments as a responsible agency, program staff may indicate that mitigation measures are required for compliance with Water Board plans and regulations.	LD	On Going	CEQA Comments
3A-7	<u>Inclusiveness in Permit Renewal Process</u> : In the permit renewal process, follow the requirements of AB 2108 and reach out to DACs and tribes to solicitate their concerns and comments. In generating the DACs and	LD	On Going	Public Outreach Activities

	tribal lists, coordinate with the State Board Public Outreach staff and appropriate Regional Board staff. In addition, review and consider the EnviroScreen scores of local communities that may be affected by regulated facilities. Uses the results of 1B-1 and 1B-2.			
3A-8	<u>EnviroScreen Scores in Enforcement Reports</u> : Program staff will include a tally of high CalEnviroScreen score (definition of high score) sites receiving formal enforcement in quarterly Executive Officer’s reports. The Enforcement Program will continue to prioritize Class A priority violations which are those violations that potentially pose an immediate and substantial threat to beneficial uses and/or that have the potential to cause significant detrimental impacts individually or cumulatively to human health or the environment. As part of the prioritization of enforcement cases, Class A priority violations would weigh heavier based on higher scores taken from tools such as CalEnviroScreen. Uses data from 1A-1 and 1A-2.	ENF	On Going	Document in Quarterly Reports
3A-9	<u>Enhance Noticing for Public Participation</u> : Staff will enhance noticing for public participation in the permitting processes. Enhanced noticing may include, but will not be limited to, engaging with tribes and environmental organizations beyond the current applicable legal requirements, referencing CalEnviroScreen or similar tools to better understand cumulative environmental burdens faced by the communities in which the development will be occurring, and translating notices into languages spoken by stakeholders. Use results of 2B-7 and 2B-8.	D&F	On Going	Public Outreach Activities
3A-10	<u>Tribal Beneficial Uses in Basin Plan</u> : The Program shall continue to prioritize the designation of tribal beneficial uses within the region, and shall develop processes to	RP TMDL	6/30/27	BPA Document

	<p>conduct, “equitable, culturally relevant community outreach to promote meaningful civil engagement from potentially impacted communities” in accordance with the requirements of AB 2108. Uses results of 2B-7.</p>			
<p>3A-11</p>	<p><u>Climate Change Plan for TMDL Program:</u> TMDLs program implementation will also consider and address to the extent feasible impacts to surface waters used by tribes and disadvantaged communities that may threaten or limit attainment of beneficial uses in those waters that may result from climate change and its associated hazards such as increased wildfires, drought, flooding, and sea level rise. As an outcome achieving racial equity goal, we will apply racial equity when those most impacted by the structural racial inequities are meaningfully involved in the creation and implementation of the institutional policies and practices of our Inland and Coastal Total Maximum Daily Loads (TMDLs) program that impact their lives. No segment of our regulated entities or communities because of its racial or economic makeup shall bear a disproportionate share of the risks and consequences of environmental harm or be denied equal access to environmental benefits. As a result, we strive for environmental equity in all our TMDLs program development and implementation, our policy making, and our regulatory activities. Uses 1B-6 and works with 3B-1 below.</p>	<p>TMDL</p>	<p>6/30/27</p>	<p>Activities Log and Plan</p>

Goal 3B: Remove barriers for community access and participation in water decision-making by providing resources for capacity building, including funding, training, and education.

No.	Task	Programs & Teams	Timing	Measuring Success
3B-1	<p><u>Climate Change Consideration</u>: Develop a plan to identify climate change impacts (related to State Water Board authorities) and how they may potentially disproportionately impact BIPOC communities or interests. Identify and implement actions to address climate change impacts, related to State Board authorities, found likely to have disproportionate impacts on BIPOC communities or interests.</p> <p>Uses results of 2B-7 and 2B-8.</p>	All	2028	Plan in Place
3B-2	<p><u>Community Capacity Funds</u>: Develop a community capacity building pilot fund to: 1) compensate tribal and BIPOC community partners for their time and expertise; and 2) support tribal- and community-led projects that address environmental clean-up projects. 3) provide technical assistance and expert knowledge related to water quality issues to tribal communities to build trust. Uses results of 2B-7 and 2B-8.</p>	All	2028	Plan in Place
3B-3	<p><u>Prioritization of Impacted Sites</u>: Aim to mitigate environmental burdens and health risks and ensure an equitable allocation of available resources, with a focus on historically marginalized communities. Prioritize the cleanup and remediation efforts in areas with a higher concentration of minority populations, considering the historical burden of environmental hazards on these communities. Implement cleanup strategies that not only address immediate environmental concerns (e.g. VI) but also prioritize long-term solutions that promote health and resources protection. Ensure that the benefits of the cleanup efforts, such as improved environmental quality and health outcomes, are fairly distributed among all affected communities, regardless of race or socioeconomic status.</p> <p>Uses results of 2B-7 and 2B-8.</p>	SCP	2028	Plan in Place
3B-4	<p><u>Prioritization of Enforcement Actions</u>: The State Water Board’s Racial Equity Resolution found that</p>	ENF	2028	Plan in Place

	<p>violations of clean water laws and regulations disproportionately impact DACs/ BIPOC communities. Although the Enforcement Program currently prioritizes sites based on whether violations have the potential to impact a source of drinking water, or a source of water used by a Tribal Nation, during FY 23/24, program staff will also assess how violations impact DACs and communities of color using tools, as an example CalEnviroScreen.</p> <p>Uses results of 2B-7 and 2B-8.</p>			
3B-5	<p><u>Translation of Outreach Materials:</u> Many dischargers regulated by the Stormwater Program struggle with compliance due to language access barriers. When appropriate, materials used to assist dischargers in understanding the path to compliance (e.g., handouts, PowerPoints, webpages, applications, etc.) should be available in multiple languages. Program staff will work with State Water Board staff and other regions and shall review outreach materials and assess which materials should be available in multiple languages and shall disseminate translated materials within affected communities.</p>	SW	2028	Plan in Place
3B-6	<p><u>Collaboration on Wastewater Permits:</u> When issuing individual or general WDRs orders and/or NPDES permits, specially involving a time schedule order, our staff will implement outreach activities to consult with tribal and disadvantaged communities that may be impacted by our proposed regulatory actions before bringing the regulatory action before our regional board for adoption.</p> <p>Uses results of 2B-7 and 2B-8.</p>	WW	2028	Plan in Place
3B-7	<p><u>Collaboration on Recycled Water Permits:</u> Recycled water staff will collaborate with local governments in reviewing CEQA documents for new recycled water projects. Staff will also reach out to DACs and tribes to solicit their concerns and comments during the permit renewal process. Additionally, staff will provide enhanced oversight for new indirect and direct potable reuse recycled water facilities to ensure proactive engagement</p>	RW	2028	Plan in Place

	<p>and informative communication with affected communities, particularly focusing on the potential environmental burdens these facilities may pose. Uses results of 2B-7 and 2B-8.</p>			
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Strategic Objectives 4: Sharing Power and Knowledge with Communities: Offering ongoing training and dedicated resources to raise awareness of the Santa Ana Water Boards’ role in managing the state’s water resources; cultivating authentic relationships that empower communities as partners for racial equity.

To accomplish this objective the Santa Ana Water Board needs to accomplish some of the tasks identified in Strategic Objectives 1, 2 and 3. This goal is to continue to work together and collaborate with BIPOC communities. The goal is set to meet this objective are listed below:

- Goal 4A: Consult, collaborate, and partner with BIPOC communities in decision-making processes.

The following tables are the specific tasks that we have identified to meet the goal and ultimately the Strategic Objective 4.

Goal 4A: Consult, collaborate, and partner with BIPOC communities in decision-making processes.

No.	Task	Programs & Teams	Priority	Measuring Success
4A-1	<p><u>Plan to Sustain Engagement</u>: Based on the results of the activities taken in Goals 1, 2, and 3. Identify the best approach and practices to create continued collaboration with identified partners. Use results of Goals 3A and 3B.</p>	RET	2029	Plan
4A-2	<p><u>Expand Outreach of Cannabis Program</u>: Cannabis Program staff will continue working to identify new locally relevant interested parties for outreach, specifically within the cannabis and adjacent industries, prior to updates of the Cannabis General Order and Cannabis Policy in 2025, and assist in facilitating any outreach efforts by the State Water Board’s Division of Water Quality in the Santa Ana, Los Angeles, and San Diego Regional Water Boards’ jurisdictions, including through distribution via GovDelivery listservs and any in-person and/or virtual workshops.</p>	CAN	2029	Plan

	<p>In October 2023, Cannabis Program staff provided comments and input to San Diego County’s proposed Socially Equitable Cannabis Program on water quality protection topics as they relate to a proposed ordinance to amended zoning and permit cannabis cultivation in unincorporated San Diego County. A kickoff meeting with the County’s planning group occurred on January 17, 2024, and Cannabis Program staff plan to be actively engaged in the process throughout 2024 and beyond.</p> <p>The Cannabis Program has two bilingual staff (Spanish-English and Armenian-English) that provide bilingual services, oral and written communication in Spanish and Armenian, to the public. The staff that is bilingual in Spanish and English, plans to apply for certification in 2024 through CalHR’s Bilingual Services Program. That staff has been providing regular bilingual services to the public for the past year in the Cannabis Program, and will continue to do so, as well as making themselves available to all of the Santa Ana Water Board’s programs, as needed, once they’ve been officially certified.</p> <p>Uses results of Goals 3A and 3B.</p>			
<p>4A-3</p>	<p><u>Expand Outreach of CAFO Program:</u> The Santa Ana Water Board’s 2018 General Waste Discharge Requirements for CAFOs (Dairies and Related Facilities) within the Santa Ana Region is an NPDES permit under the federal Clean Water Act. For 2024, the CAFO program has been tasked with developing a general order which will incorporate dairy and non-dairy CAFO requirements. The CAFO Program will ensure that development of this new general order includes equitable, culturally relevant community outreach, including in-person and/or virtual information workshops and through the GovDelivery listservs, to promote meaningful civil engagement from potentially impacted communities. This outreach effort began in early 2023 when initial workshops were held with industry groups in April and May 2023. The general order will also include findings that consider the impacts on potential environmental</p>	<p>CAFO</p>	<p>2029</p>	<p>Plan</p>

	<p>justice, tribal impacts, and racial equity considerations that shall be developed in collaboration with affected communities. To identify communities that may be affected by the general order, CAFO Program staff will reach out to local industry groups, including the Milk Producers Council and local coalition groups, local Resource Conservation Districts and Non-Governmental Organizations, such as the California Coastkeeper Alliance, and by using the data available through the Office of Environmental Health Hazard Assessment’s CalEnviroScreen tool. Uses results of Goals 3A and 3B.</p>			
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4. Monitoring and Reporting Plan:

The monitoring and reporting plan will include the results of each task listed in the tables above. The Racial Equity Team will be responsible for compiling the results of the work performed on an annual basis. This effort will also include successes and lesson learned, and when needed will make amendments to the action plan. And after the five years, the action plan will be updated and renewed for the next five years.

5. Definitions:

- a. Racial Equity:** Racial Equity occurs when race can no longer be used to predict life outcomes, and outcomes for all groups are improved (Government Alliance on Race and Equity (GARE))
- b. Environmental Justice:** Environmental Justice essentially means that everyone—regardless of race, color, national origin, or income—has the right to the same environmental protections and benefits, as well as meaningful involvement in the policies that shape their communities.
- c. Strategic Objectives:** Strategic objectives are high-level and measurable goals outlining what an organization wants to achieve, with a clearly defined deadline.
- d. Goals:** A goal is a predetermined target that a business or individual plans to achieve in a set period of time.
- e. Tasks:** A task is a single unit of work, or a single step in a multi-step project.