

# **San Dieguito Valley Brackish Groundwater Desalination Project**

## **Hydrogeologic Investigation**

### **Limited English Proficiency Plan**

#### **Introduction**

Olivenhain Municipal Water District is committed to providing access to its services and programs to individuals with Limited English Proficiency, in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. This plan outlines LEP strategies and measures for the San Dieguito Valley Brackish Groundwater Desalination Project Hydrogeologic Investigation, funded in part by the EPA in San Diego County. This project involves the testing of water well sites and data compilation. The likelihood of encountering individuals with LEP is negligible, if at all. Given the specialized nature and limited scope of this project, there is minimal anticipated interaction with the general public, including LEP individuals.

#### **Legal Authority and Obligation**

Title VI of the Civil Rights Act prohibits discrimination based on race, color, or national origin, including language, in programs or activities that receive federal financial assistance. Executive Order 13166 directs recipients of federal funding, such as Olivenhain Municipal Water District, to take reasonable steps to ensure effective ways of communicating with LEP individuals and members of the public who have LEP.

#### **LEP Needs Assessment: Four-Factor Analysis**

To determine the needs of LEP individuals in OMWD's service area, Olivenhain Municipal Water District has conducted a four-factor analysis in compliance with EPA guidelines:

1. **Demographics of LEP Individuals**

This project involves the testing of water well sites and data compilation. The likelihood of encountering individuals with LEP is negligible, if at all. Given the specialized nature and limited scope of this project, there is minimal anticipated interaction with the general public, including LEP individuals.

For the purposes of completing the four-factor analysis, OMWD used United States Census Bureau data from 2023 to identify the prevalence of LEP populations, particularly focusing on the dominant non-English language in San Diego County. (Please note, OMWD's service area is a small portion of San Diego County and it is

representative of OMWD’s service territory for this analysis.) San Diego County’s data reflects 5.8 percent of the population has LEP (link to table below: S1602, United States Census Bureau, 2023 Census Table Percent Limited English-Speaking Households). Of the types of languages spoken at home in San Diego County, Table S1601 reflects, 25 percent speak Spanish.



[S1602: Percent limited ... in 2023 - Census Bureau Map](#)

S1601 | Language Spoken at Home

American Community Survey | 2023: ACS 1-Year Estimates Subject Tables

Notes | Geos | Topics | Codes | Dataset | Year | More Tools

Please note that American Community Survey 1-Year estimates are published for geographies with a population of 65,000 or more. For more information, see the guidance for when to use 1-year or 5-year estimates.

San Diego County, California					
Label	Total		Percent		
	Estimate	Margin of Error	Estimate	Margin of Error	Mi
Population 5 years and over	3,090,942	.....	(X)		
Speak only English	1,897,550	±19,276	61.4%		
Speak a language other than English	1,193,392	±19,279	38.6%		
SPEAK A LANGUAGE OTHER THAN ENGLISH					
Spanish	774,033	±13,808	25.0%		
5 to 17 years old	143,298	±7,008	4.6%		
18 to 64 years old	549,090	±9,520	17.8%		
65 years old and over	81,645	±2,433	2.6%		

[S1601: Language Spoken at Home - Census Bureau Table](#)

## 2. Frequency of Contact with LEP Individuals

OMWD has completed an assessment of the potential frequency of contact and due to the limited scope of this water well data collection and analysis project, OMWD does not anticipate significant interaction with LEP individuals. This project does not involve direct community engagement or public outreach, and interactions are expected to be confined to technical and project-specific personnel. The frequency of contact with LEP individuals is anticipated to be negligible, as the project activities do not naturally lend themselves to situations where LEP assistance would be commonly required. If LEP individuals do come in contact with OMWD regarding this project, OMWD will track and assess the inquiries to determine if anything further is required to provide for a special focus for LEP individuals as it relates to this project.

## 3. Nature and Importance of the Services Provided

OMWD has reviewed the nature and importance of OMWD's project activities provided, and how if the consequences of the project have an impact the LEP population which could require language services. This project is focused on data compilation from test wells, with the primary objective being the collection and analysis of technical data. As this work is conducted within a controlled, specialized environment, there is no anticipated need to engage with the general public or LEP individuals. The project does not entail public outreach activities that could affect community members, and there are no foreseeable situations that would require language services. Given the internal nature of the work, any contact with LEP individuals is highly unlikely, and no consequences impacting the public are expected.

## 4. Resources

OMWD will evaluate the resources available to OMWD and the costs of language services, and will endeavor to plan for language services sufficient to provide meaningful project information cost-effectively, if there is a reasonable need based on actual volumes of LEP inquiries during the project. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

### **Language Assistance Measures**

Since the project is focused on data compilation from test wells, we do not expect inquiries from the general public or LEP individuals. Given the technical and internal nature of the work, arranging language services in advance is not deemed necessary. However, should any inquiries arise, OMWD is prepared to provide information and assistance, as OMWD employs bilingual Spanish speaking staff who can address questions regarding the project. OMWD will take any reasonable steps necessary to provide LEP persons access to the

project. Language assistance will be provided for LEP persons through oral interpretation of Spanish language in person or by telephone at OMWD's headquarters located at 1966 Olivenhain Road, Encinitas. Language assistance may include interpretation, which means oral or spoken transfer of information from one language to another; and/or translation, which means the written transfer of information from one language to another. OMWD will determine which method of language assistance is needed and reasonable.

In some situations, it may be reasonable to ask the LEP individual to return at a specified date and time to allow OMWD to arrange for a Spanish-speaking interpreter or translator service. Interpreter and translation services are also available by contacting OMWD's Title VI Coordinator.

1. Translation of Vital Documents

"Title VI Notice To The Public" notices will be translated into Spanish through the four-factor analysis.

Given the internal focus of this data compilation project on test wells, OMWD does not anticipate any need for translation of technical documents other than public notices since the project does not involve public outreach, or activities that would require community-facing documentation. In the event that LEP individuals seek information, our bilingual staff is available to provide assistance as needed. If, through inquiry tracking, OMWD finds a large volume of LEP requests for translated vital documents for this project, OMWD will weigh the costs and benefits of translating documents for LEP groups, consider the expense of translating the documents, and the barrier to meaningful translation or interpretation of technical hydrogeological and biological analysis documents, the likelihood of frequent changes in documents, the apparent literacy rate in an LEP group and other relevant factors, to produce these translated documents.

2. Oral Interpretation Services

OMWD employs bilingual Spanish-speaking staff that, where the frequency of contact with LEP persons or potential individuals is statistically significant, will provide for efficient and effective communication. A decision to fill vacancies with individuals that are bilingual for the translation of or assistance regarding this project will be based on a needs assessment with due consideration given to budget constraints, and in accordance with OMWD human resource policies and procedures.

3. Bilingual Staff

Bilingual staff is typically available to answer LEP questions in person or over the phone at OMWD's headquarters during business hours.

#### 4. Website Accessibility

The project's website will include general information for the general public and how LEP persons can obtain information regarding the project. LEP persons will be able to view public notices translated in Spanish for the project and also contact the Title VI Coordinator for further information. The project website will also provide OMWD office contact information for LEP persons to obtain Spanish language support. The website will also provide further information as it relates to OMWD's Administrative and Ethics Code, Section 20.13, regarding Title VI compliance and grievance procedures.

#### 5. Signage and Visual Aids

This project involves the testing of water well sites and data compilation. The likelihood of encountering individuals with LEP is negligible, if at all at the project site. Given the specialized nature and limited scope of this project, there is minimal anticipated interaction with the general public, including LEP individuals. Any on-site project signage for the general public at the project location will include OMWD office contact information for LEP Spanish language support for project information.

### **Training of Staff**

To effectively implement this LEP plan:

1. OMWD staff working directly on this project will review and acknowledge they have read Title VI Civil Rights Act Compliance by way of OMWD's Administrative and Ethics Code, Section 20.13, to provide meaningful access to information and services for LEP individuals regarding this project.
2. OMWD staff working directly on this project will be provided access to OMWD's administrative policies which also identify OMWD's Title VI Coordinator.
3. Customer Service staff having contact with the public will be trained to work effectively with in-person and telephone inquiries, and, if need arises based on inquiries from LEP individuals, bilingual Spanish-speaking staff will be able to provide information to LEP individuals for the limited and negligible amount of inquiries anticipated.

### **Monitoring and Evaluation**

The LEP plan will be evaluated periodically through the duration of the project to ensure effectiveness and compliance. The evaluation will include:

1. Reviewing demographic changes and updating the four-factor analysis.
2. Assessing the adequacy of language assistance measures and revising them as necessary.

3. Conducting analysis to gauge the effectiveness of LEP services and identify additional needs.
4. Reporting findings to the EPA and integrating feedback into future planning efforts if modifications are necessary.

  
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Kimberly A. Thorner, General Manager  
Olivenhain Municipal Water District

  
Date