

SAFER: IDENTIFYING AT-RISK PUBLIC WATER SYSTEMS – SELECTING RISK INDICATORS (Part 3)

October 13, 2020
9:00 am

Remote participation only





Welcome and Meeting Logistics

Itze Abeyta



Water Board's Mission Statement

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.

What is the SAFER Drinking Water Program?

SAFER = Safe and Affordable Funding for Equity and Resilience



Division of
Drinking Water
systems



Division of
Financial
Assistance
funding



Office of
Public
Participation
communities



SAFER
Advisory Group
local expertise

Presentation Outline

- Overview of Needs Assessment
- Risk Assessment 2.0 Development
- Process for Determining Recommended Risk Indicators
- Proposed Recommended Risk Indicators
- Next Steps and Timeline

Ways to Participate-

- 1. Watch ONLY:** Visit video.calepa.ca.gov
- 2. Email:** Submit a comment or ask a question that will be read aloud, send an email to: safer@waterboards.ca.gov
- 3. Q&A:** Submit a question using the Q&A feature at the bottom of your Zoom Screen. You can UPVOTE any question you would like answered.
- 4. Raise Hand:** Attendees will be given the opportunity to provide verbal comment or ask questions, if you're interested in this option, please raise your virtual hand when the time is right.

- Please wait for your name to be called.
- Public comments are 3 minutes each.



Welcome and Introduction

Kristyn Abhold
Needs Analysis Unit
Division of Drinking

Audience Poll Question 1

Did you participate in or review the April 17, 2020 and/or July 22, 2020 webinar on the Risk Assessment for Public Water Systems?

- Yes
- No

View recordings and materials here: <https://www.waterboards.ca.gov/safer/calendar.html>

Provide a written response to poll questions at the link below by **October 30th**:

- <https://bit.ly/3nv7Q4x>

Audience Poll Question 2

Have you read the White Paper: *“Evaluation of Potential Indicators & Recommendations for Risk Assessment 2.0 for Public Water Systems”*?

- Yes, read the whole thing
- Yes, I skimmed it
- No, but I plan to
- No, I don't intend to read it

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

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B 200 and the Needs Assessment

Senate Bill 200 created the **Safe and Affordable Drinking Water Fund**.

- Up to \$130 million per year through 2030
- The annual Fund Expenditure Plan prioritizes projects for funding, documents past and planned expenditures, and is “based on data and analysis drawn from the drinking water **Needs Assessment**” (Health and Safety Code §116769).



Needs Assessment Components



COMPONENT 1

Affordability Assessment

Public Water Systems

COMPONENT 2

Risk Assessment

Public Water Systems (<3,300 connections), Tribal Systems, State Small Water Systems, and Domestic Wells

COMPONENT 3

Cost Estimate for Interim and Long-Term Solutions

Public Water Systems (<3,300 connections), Tribal Systems, State Small Water Systems, and Domestic Wells

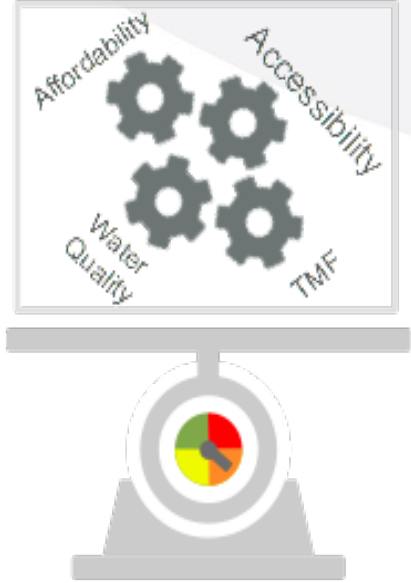
Needs Assessment for Public Water Systems

AFFORDABILITY ASSESSMENT



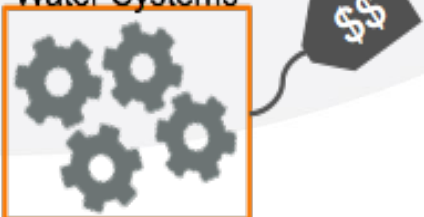
RISK ASSESSMENT

Water Systems



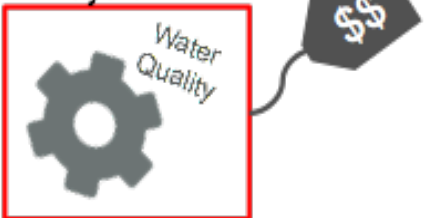
COST ASSESSMENT

All At-Risk Public Water Systems

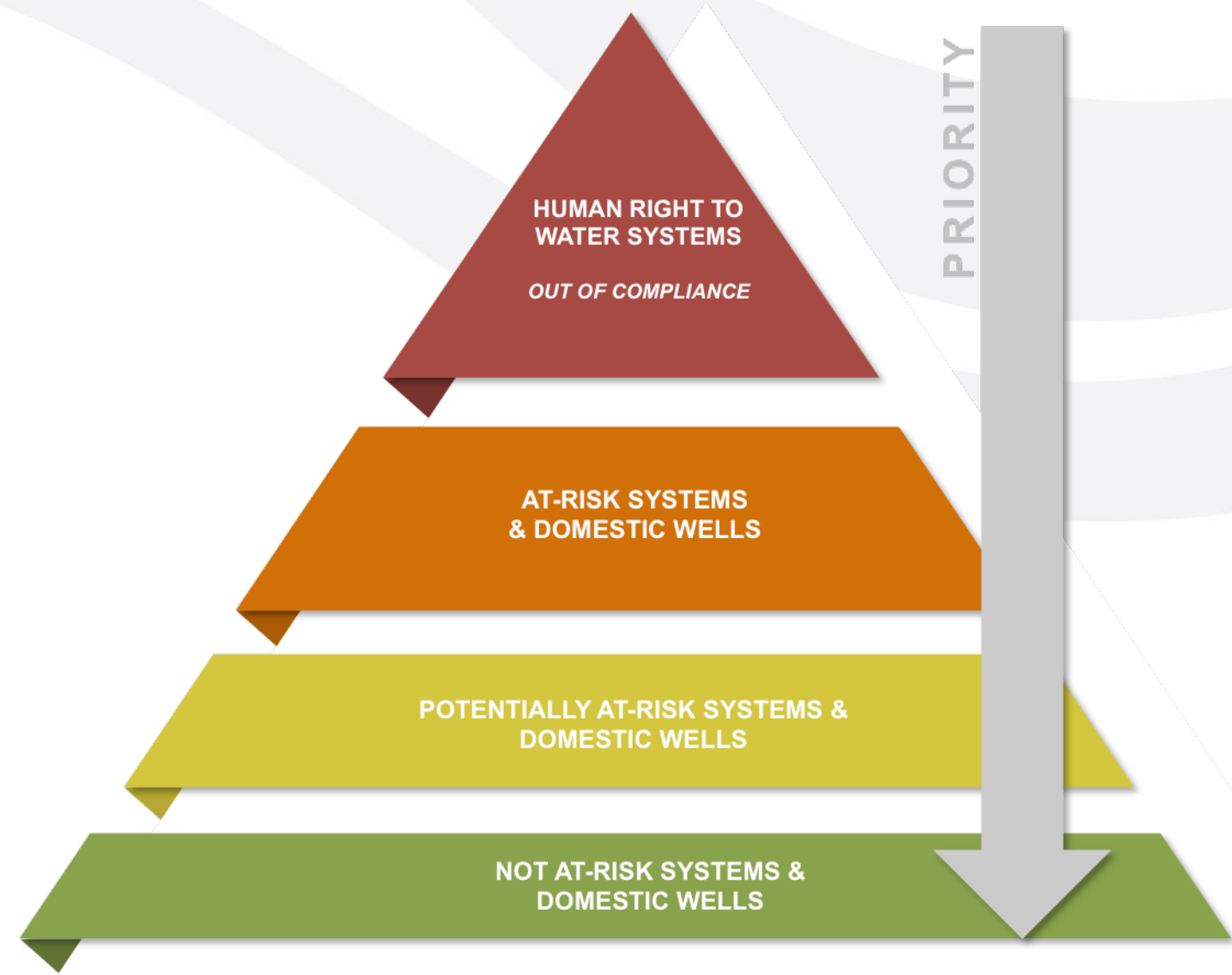


+

All HR2W Systems



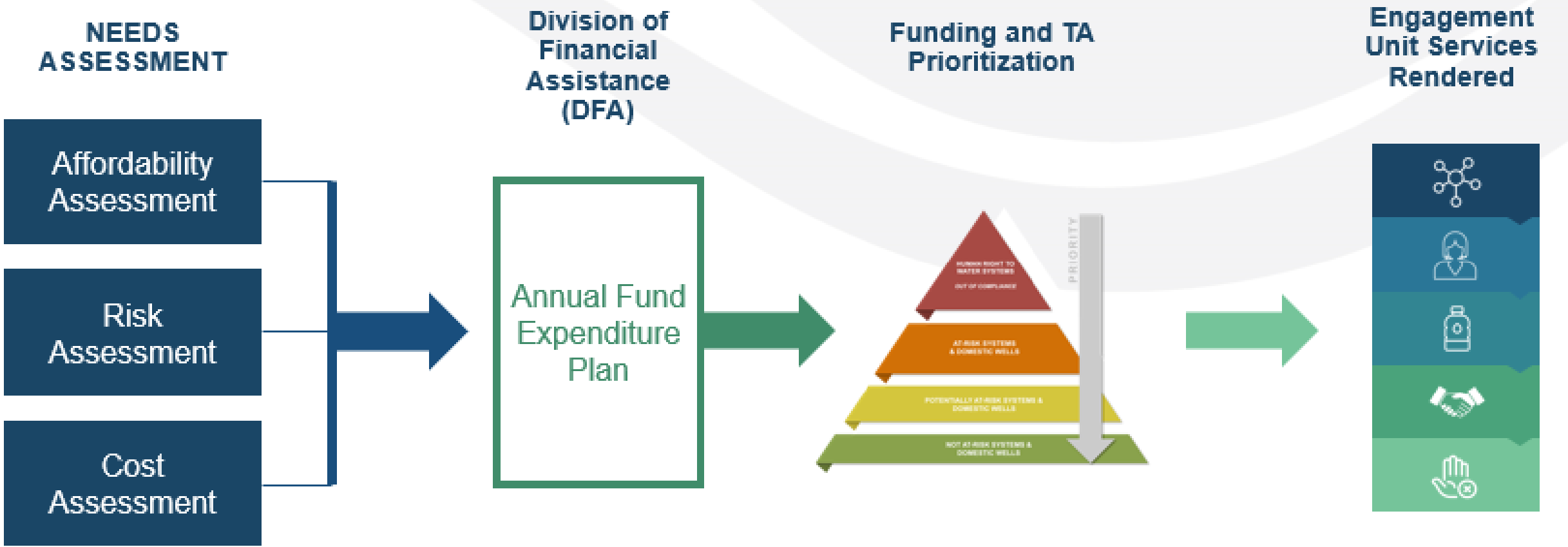
SAFER Program and the Risk Assessment



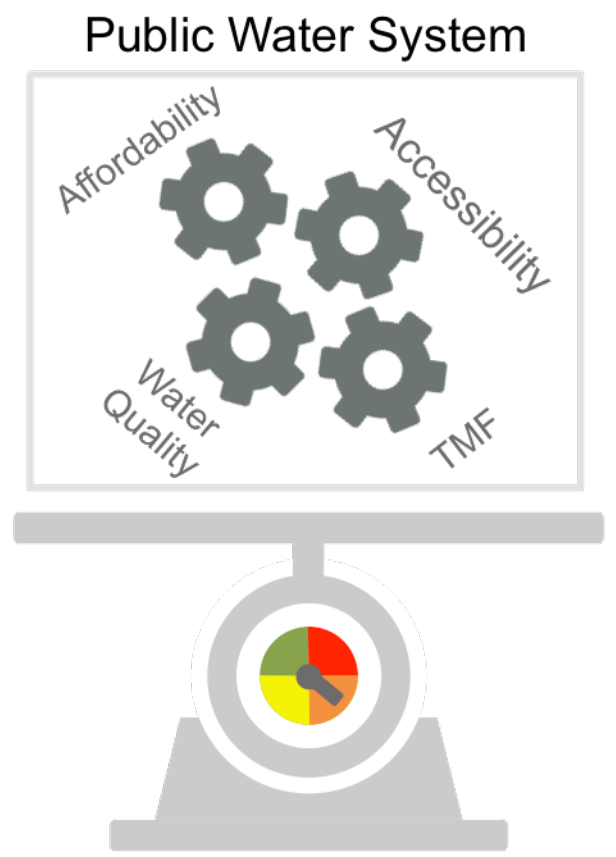
SAFER Program



Needs Assessment Uses



Risk Assessment for Public Water Systems



RISK ASSESSMENT METHODOLOGY



RISK INDICATORS

Quantifiable measurements of key data used to assess a water system's risk of becoming non-compliant with water quality standards.



THRESHOLDS

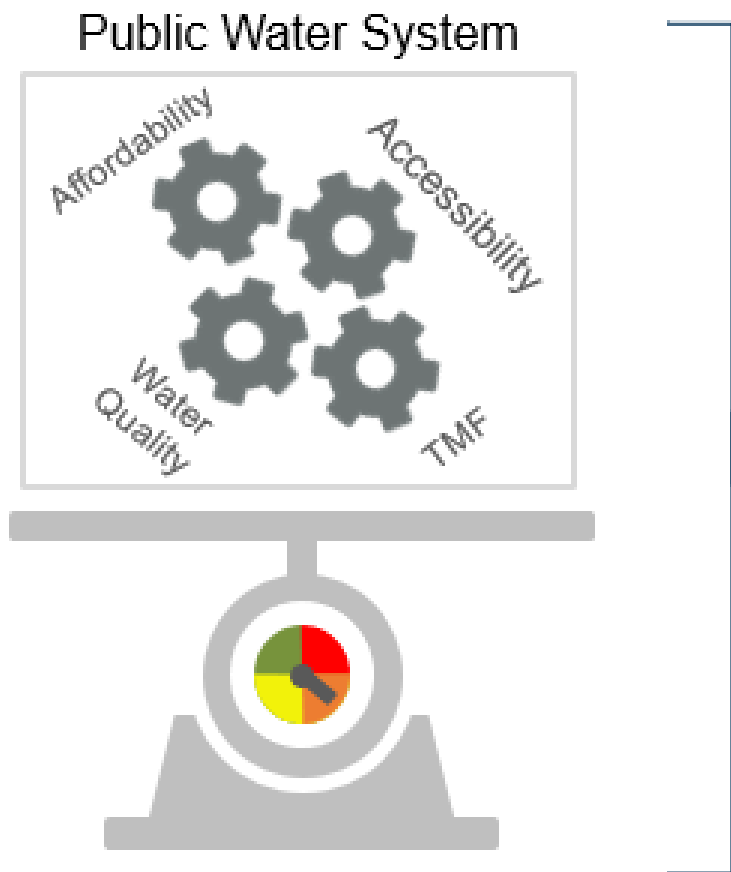
Values associated with a risk indicator that designates when a water system is more at-risk of becoming non-compliant with water quality standards.



WEIGHTS / SCORES

Application of weight to each risk indicator – as some may be deemed more critical than others in contributing to overall risk.

Risk Assessment for Public Water Systems



RISK ASSESSMENT METHODOLOGY



RISK INDICATORS

Quantifiable measurements of key data used to assess a water system's risk of becoming non-compliant with water quality standards.

TODAY'S WEBINAR



THRESHOLDS

Values associated with a risk indicator that designates when a water system is more at-risk of becoming non-compliant with water quality standards.

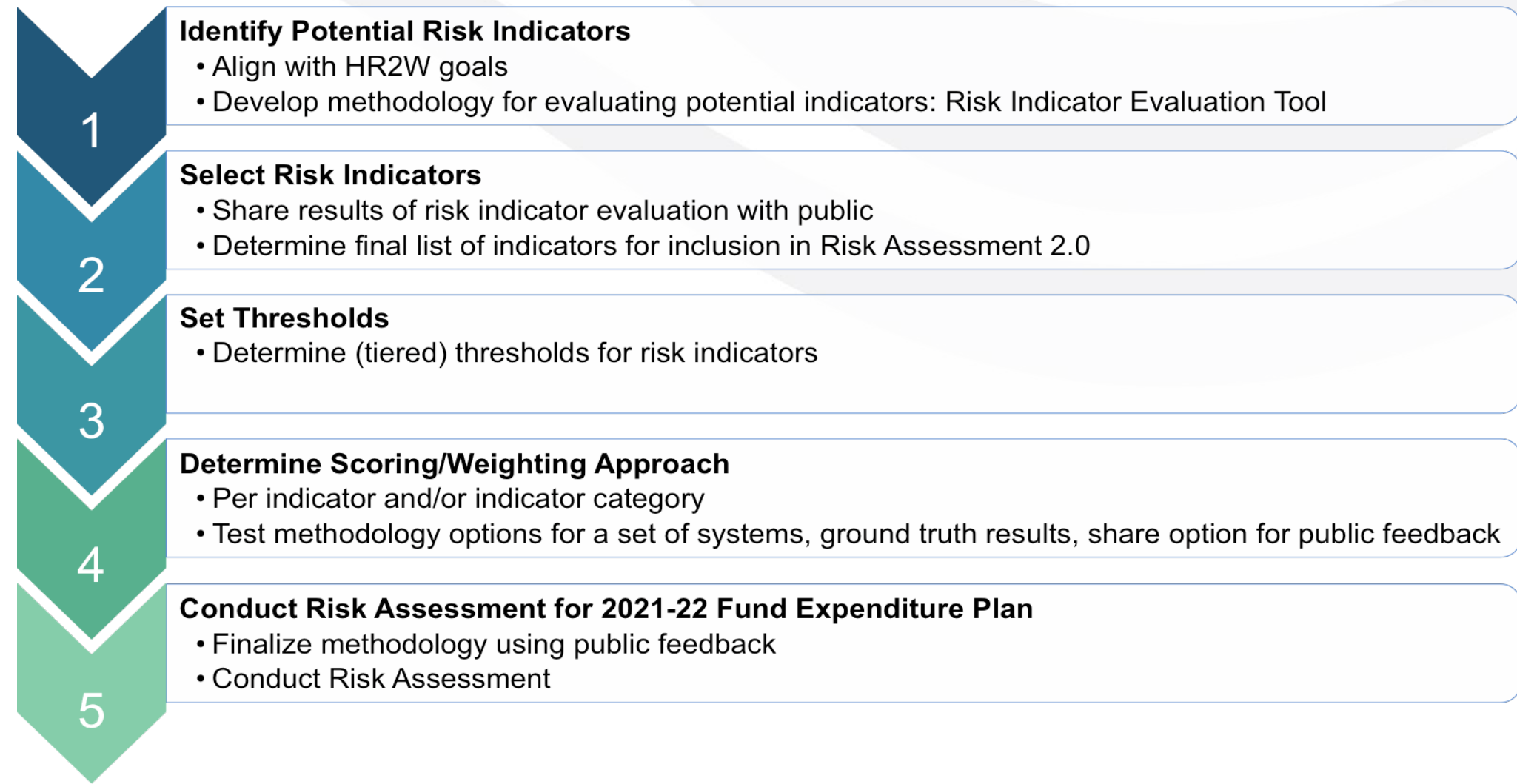
DECEMBER 14th WEBINAR



WEIGHTS / SCORES

Application of weight to each risk indicator – as some may be deemed more critical than others in contributing to overall risk.

Phases of Risk Assessment Development



Re-Cap Risk Assessment 1.0 Indicators

Risk Assessment 1.0 Indicators (water systems < 3,300 connections)

- Explored in April 17, 2020 Webinar: <https://www.waterboards.ca.gov/safer/calendar.html>
- Detailed in White Paper: https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/draft_white_paper_indicators_for_risk_assessment_07_15_2020_final.pdf

- Water Outages
- Waterborne Illness: Current and Historical
- Lead and Copper
- Extensive Treatment Required
- Treatment Technique Violations
- Single Groundwater Source
- Absence of Customer-Level Meters

- Monitoring and Reporting Violations
- Bacteriological Violations or E. coli
- Operator Certification Violations
- Disadvantaged Community Status
- Location In a High Priority Groundwater Basin
- Active Standing with California Secretary of State Status Requirements

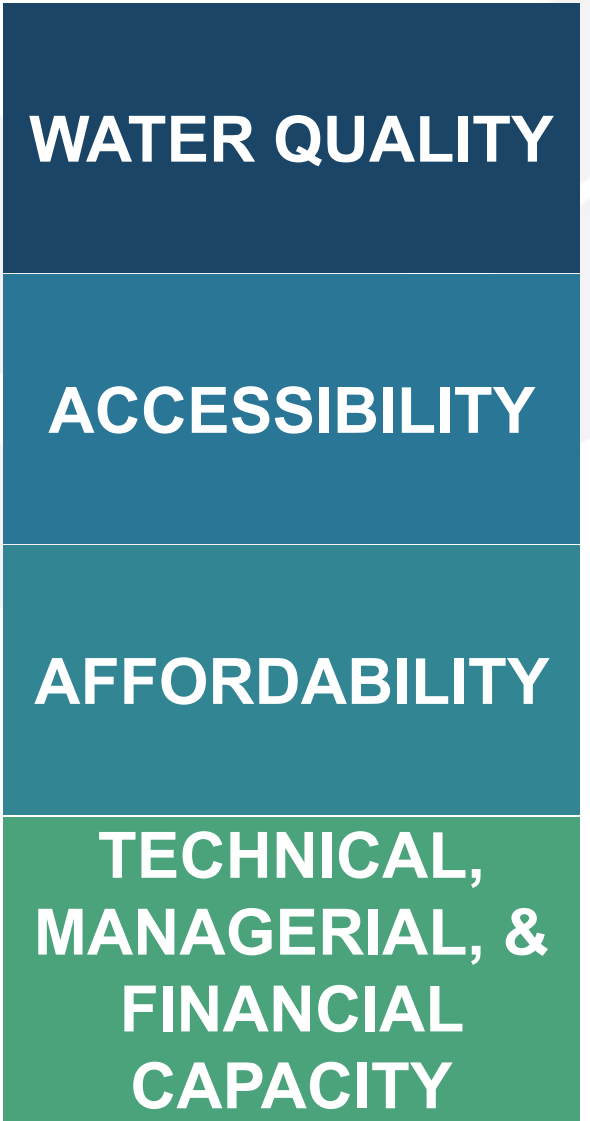
Step 1: Identify Possible Risk Indicators

Solicited public and stakeholder recommendations through 2 webinar workshops:

- April 17, 2020
- July 22, 2020

Webinar Recordings and Detailed Draft White Paper:
<https://www.waterboards.ca.gov/safer/calendar.html>

129 Potential Risk Indicators Identified!



Identifying Potential Risk Indicators

- Researched federal, state, and NGO efforts
- Explored alignment with other CA State efforts:
 - **Office of Environmental Health Hazard Assessment (13 Indicators)**
 - HR2W Risk Assessment and Data Tool
 - **Department of Water Resources (29 Indicators)**
 - Integrated Regional Water Management (IRWM) planning efforts
 - Drought and Water Shortage Risk Scoring Tool
 - **California Public Utilities Commission (3 Indicators)**

Progress Since July 22nd Public Webinar



1

Incorporated public and internal-DDW recommendations to finalize list of **129 potential risk indicators**

2

Utilized **Evaluation Tool** to assess the Applicability and Data Fitness of all 129 potential risk indicators.

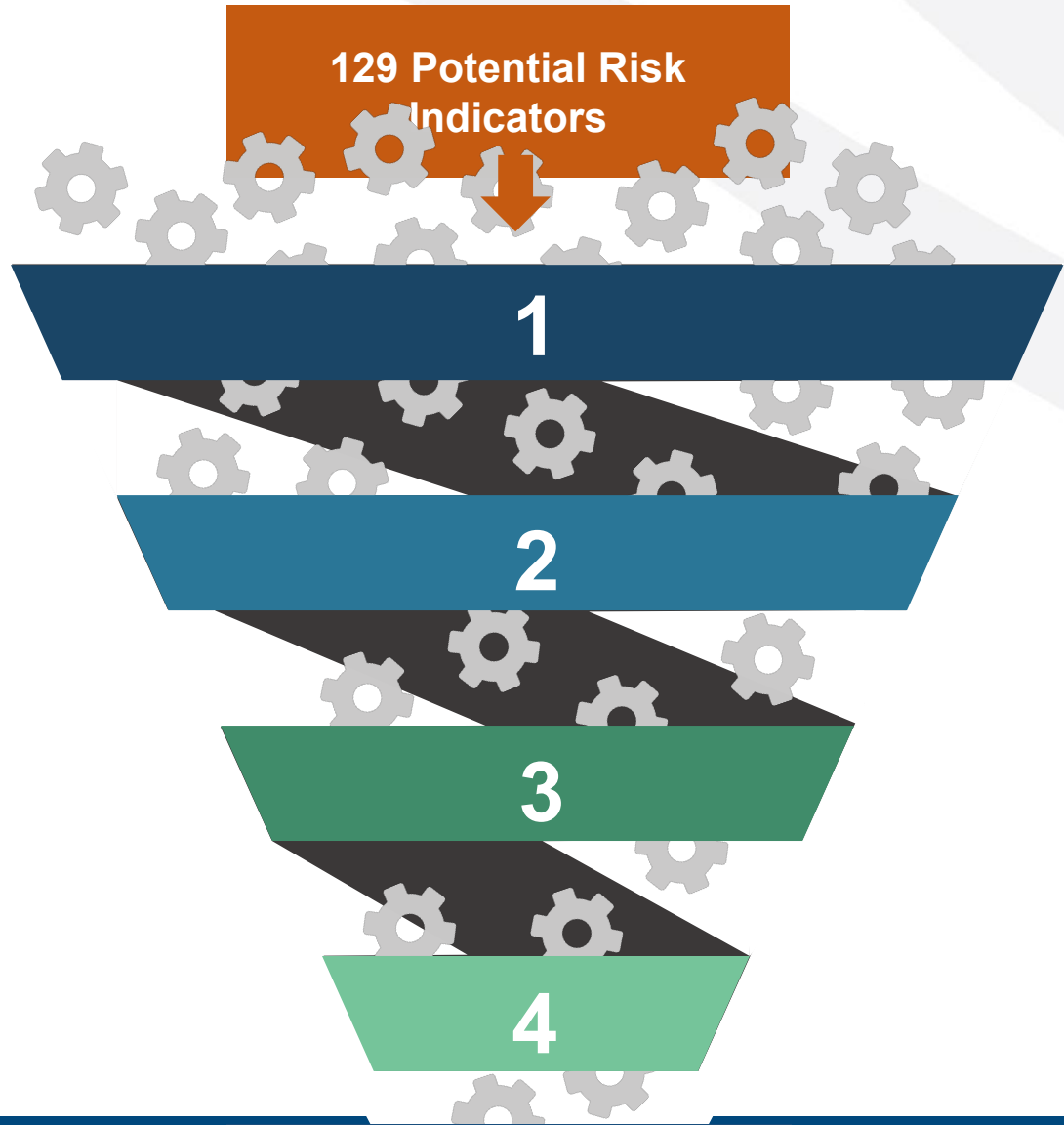
3

Identified **duplicative potential risk indicators**, to avoid “double counting” in Risk Assessment 2.0

4

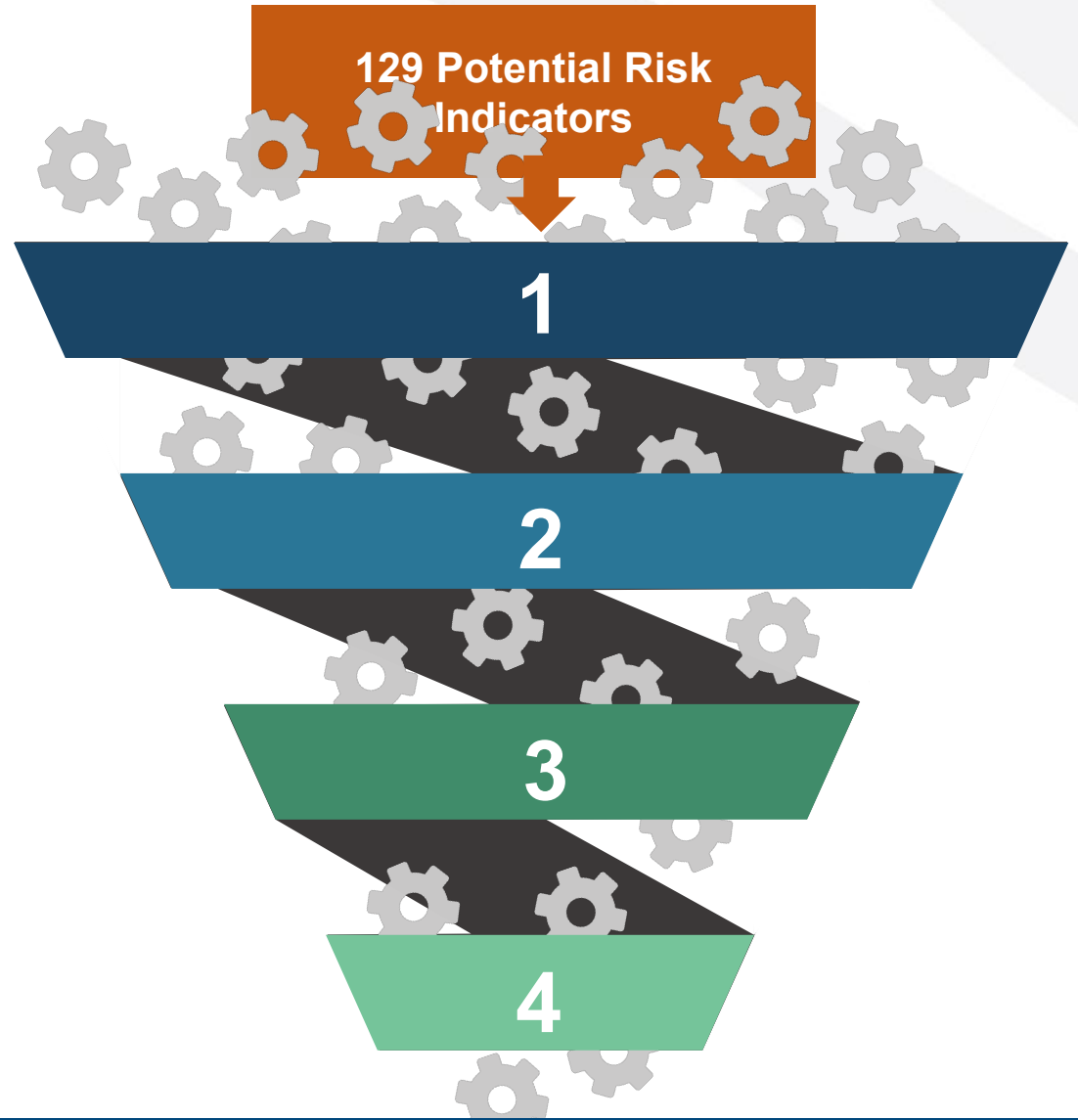
Recommended a list of indicators for Risk Assessment 2.0 and published a **White Paper** for public feedback

Process for Selecting Indicators for Risk Assessment 2.0



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Step 1: Assess Risk Indicators with Evaluation Tool



① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.

② Use evaluation results to refine list of potential risk indicators.

③ Identify moderately duplicative potential risk indicators to further refine list.

④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Risk Indicator Evaluation Tool



Step 1 Evaluation Results



STEP 1: RISK INDICATOR APPLICABILITY

This step evaluated whether a relatively strong relationship exists between a potential risk indicator and a water system's ability to provide adequate and safe drinking water.




- Scoring Criteria for Step 1:
 - **Excellent: 8 risk indicators**
 - Evidence-driven.
 - **Good: 86 risk indicators**
 - Water sector recognized.
 - **Fair: 30 risk indicators**
 - Some water sector debate over relationship.
 - **Poor: 5 risk indicators**
 - Neither evidence-based nor water sector recognized.

We relied on public feedback, external recommendations, and survey responses from 60 engineers from State Water Board District offices to determine Applicability score.

Data Coverage Evaluation Results

STEP 2: DATA FITNESS

This step evaluated whether the **required data** for each risk indicator meets the following criteria:

	DATA COVERAGE
	DATA AVAILABILITY
	DATA ACCURACY / QUALITY


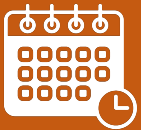

Evaluated whether the data is available for a sufficient number of California public water systems.

- **Good:** 90% or more: **63 risk indicators**
- **Fair:** 65% - 90%: **28 risk indicators**
- **Poor:** Below 65%: **38 risk indicators**

Data Availability Evaluation Results

STEP 2: DATA FITNESS

This step evaluated whether the **required data** for each risk indicator meets the following criteria:

-  **DATA COVERAGE**
-  **DATA AVAILABILITY**
-  **DATA ACCURACY / QUALITY**

Evaluated whether the data is updated and available on a recurring basis.




- **Good: 73 risk indicators**
 - Updated annually or more frequently
- **Fair: 23 risk indicators**
 - Updated less than annually but at least every three years
- **Poor: 33 risk indicators**
 - Updated less than every three years

Data Accuracy/Quality Evaluation Results

STEP 2: DATA FITNESS

We relied on external stakeholder feedback and survey responses from 60 engineers from State Water Board District offices to determine Data Accuracy score.

This step evaluated whether the **required data** for each risk indicator meets the following criteria:

	DATA COVERAGE
	DATA AVAILABILITY
	DATA ACCURACY / QUALITY

Evaluated whether the data reasonably or accurately reflects what the data is meant to measure and/or illustrate.

- **Good: 44 risk indicators**
 - Credible source, correctly reported.
- **Fair: 58 risk indicators**
 - Credible source, fairly correctly reported.
- **Poor: 27 risk indicators**
 - Dubious source, extensive incorrect reporting.

Risk Indicator Evaluation Tool: Step 3



STEP 3: COMBINED EVALUATION

This Step combined the evaluations from Steps 1 and 2 to determine if the State Water Board should consider the risk indicator for inclusion in Risk Assessment 2.0.

- **Yes:** Step 1 results must be Excellent or Good; and Step 2 results must be Good for all three criteria.
- **Maybe:** Step 1 results must be Good; and Step 2 results may be Good or Fair for all three criteria.
- **No:** Step 1 results are Fair or Poor; and Step 2 results are Fair or Poor for all three criteria.
- **Future:** Step 1 results are Excellent or Good, and Step 2 results are Fair and Poor. These will be retained for consideration for future iterations to see if data fitness scores improve.

Step 3 Evaluation Results



STEP 3: COMBINED EVALUATION

	Not Considered for Risk Assessment 2.0		Considered for Risk Assessment 2.0	
	No	Future	Maybe	Yes
Water Quality	8	6	2	12
Accessibility	16	8	5	7
Affordability	5	5	13	0
TMF Capacity	5	25	6	6
TOTAL:	34	44	26	25

Potential Risk Indicator Evaluations

Detailed evaluations for each potential risk indicator can be found in the Supplemental Appendices for the white paper.

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

- D.1 Potential Water Quality Risk Indicator Evaluations:
https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/safer_su_pp_appxd1_101320.pdf
- D.2 Potential Accessibility Risk Indicator Evaluations:
https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/safer_su_pp_appxd2_101320.pdf
- D.3 Potential Affordability Risk Indicator Evaluations:
https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/safer_su_pp_appxd3_101320.pdf
- D.4 Potential TMF Risk Indicator Evaluations:
https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/safer_su_pp_appxd4_101320.pdf

Audience Poll Question 3

Do these evaluation results align with what you expected?

- Yes, I expected these results
- Maybe, I haven't had a chance to review the potential risk indicator evaluations
- Maybe, there are some potential risk indicator evaluations I don't agree with
- No, I disagree with a majority of the potential risk indicator evaluations, the results do not align with my expectations

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

Provide a written response to poll questions at the link below by **October 30th**:

- <https://bit.ly/3nv7Q4x>

Step 2: Refine the List of Potential Risk Indicators



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Step 3: Refine the List of Potential Risk Indicators Further (1/2)



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Identifying Duplicative Potential Risk Indicators

- Created subcategories within the 4 risk indicator categories.
- Determined which indicators were moderately duplicative with other risk indicators that met evaluation criteria.
- **Results:** **27** or **53%** were somewhat or wholly duplicative.
- **Refinement:** Avoiding duplication refines list to **36 potential risk indicators for consideration.**

Example of Duplicative Potential Risk Indicators (Table 3 in White Paper – pg. 16)

Accessibility		
Source Diversification, Condition, and Reliability	Unique?	Duplicative
Number of Sources	No	A
Single Groundwater Source	No	A
Presence of Interties	No	B
Emergency Interties	No	B
Projected Sea Level Risk as Salt Water Intrusion in Coastal Groundwater	Yes	
Water Source Types	Yes	

Step 3: Refine the List of Potential Risk Indicators Further (2/2)



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Step 4: Make Recommendations for Risk Assessment 2.0 (1/2)



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Considerations for Risk Indicator Recommendations:

- Limit the number of risk indicators to a reasonable number in order to simplify the analytical burden while still providing a full picture of risk.
- Ensure a diversity of risk indicator types.
- Avoid duplicative risk indicators.
- Identify the appropriate balance between risk indicators that may be influenced by water system management and risk indicators that are outside a water system's sphere of influence.

Recommended Water Quality Risk Indicators (White Paper – Pg. 19)

WATER QUALITY
ACCESSIBILITY
AFFORDABILITY
TMF CAPACITY
Risk Indicator
Utilized By Others?
E. Coli Presence

Risk Assessment 1.0

Increasing Presence of Water Quality Trends Toward MCL
Treatment Technique Violations

Risk Assessment 1.0

Past Presence on the HR2W List
Maximum Duration of High Potential Exposure (HPE)

OEHHA HR2W Tool

Percentage of Sources Exceeding an MCL

Recommended Accessibility Risk Indicators (White Paper – Pg. 21)

WATER QUALITY	ACCESSIBILITY	AFFORDABILITY	TMF CAPACITY
---------------	---------------	---------------	--------------

Risk Indicator	Utilized By Others?
Number of Sources	OEHHA HR2W Tool; DWR Water Shortage Risk Tool
Presence of Interties	OEHHA HR2W Tool; DWR Water Shortage Risk Tool
Water Source Types	OEHHA HR2W Tool
DWR – Drought & Water Shortage Risk Assessment Results	DWR
Critically Overdrafted Groundwater Basin	DWR Water Shortage Risk Tool

Recommended Affordability Risk Indicators (White Paper – Pg. 22)

WATER QUALITY	ACCESSIBILITY	AFFORDABILITY	TMF CAPACITY
---------------	---------------	---------------	--------------

Risk Indicator	Utilized By Others?
Percent of Median Household Income (2021-22 Needs Assessment Only)	OEHHA HR2W Tool; SWRCB-FEP 2020/21; UNC Financial Dashboard
Household Burden Indicator for Drinking Water (2022-23 Needs Assessment)	UNC Financial Dashboard
Poverty Prevalence Indicator (2022-23 Needs Assessment)	
Housing Burden (2022-23 Needs Assessment)	
Extreme Water Bill (2021-22 and 2022-23 Needs Assessment)	SWRCB AB-401 Report
% Shut-Offs (2021-22 and 2022-23 Needs Assessment)	

Recommended TMF Capacity Risk Indicators (White Paper – Pg. 24)

WATER QUALITY	ACCESSIBILITY	AFFORDABILITY	TMF CAPACITY
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Risk Indicator	Utilized By Others?
Number of Service Connections	
Operator Certification Violations	Risk Assessment 1.0
Monitoring and Reporting Violations	Risk Assessment 1.0; OEHHA HR2W Tool
Significant Deficiencies	
Extensive Treatment Installed	

Step 4: Make Recommendations for Risk Assessment 2.0 (2/2)



- ① Assess 129 potential risk indicators for Applicability and Data Fitness using Evaluation Tool.
- ② Use evaluation results to refine list of potential risk indicators.
- ③ Identify moderately duplicative potential risk indicators to further refine list.
- ④ Make recommendation and solicit public feedback to determine final list of indicators for Risk Assessment 2.0.

Audience Poll Question 4

Do you support this list of recommended indicators for Risk Assessment 2.0?

- Yes, I support this list of risk indicators
- Maybe, there are some risk indicator recommendations I don't agree with
- No, I do not support the majority of the recommended risk indicators
- I need more time to review before I provide feedback

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

Provide a written response to poll questions at the link below by **October 30th**:

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Violation-Type Risk Indicators

- A number of the potential and recommended risk indicators are associated with **non-MCL violations**. The recommended indicators include:
 - Treatment Technique Violations
 - Operator Certification Violations
 - Monitoring and Reporting Violations
- Further consideration is being given to define what it means for a water system to “**consistently fail**” or be “**at-risk.**”
- This may lead to an **expanded methodology** for how water systems are classified and prioritized for the SAFER Program.

Discussion Topic: What is Failure?

How should the State Water Board define “failing”?

Ways to Participate-

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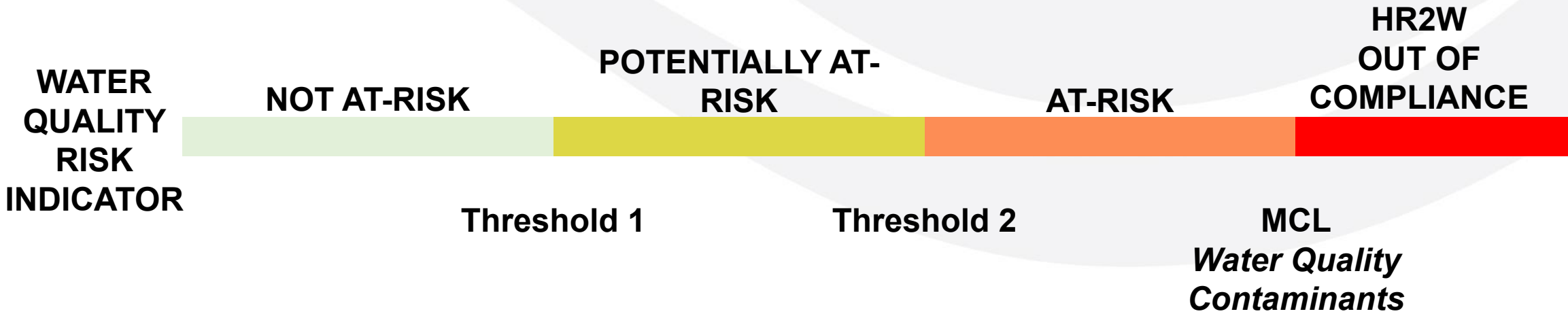
- Please wait for your name to be called.
- Public comments are 3 minutes each.

Immediate Next Steps

- Incorporate public feedback to finalize **Risk Assessment 2.0 Indicators**.
 - White Paper:
https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf
 - Submit feedback by **October 30th** to: SAFER@waterboards.ca.gov
 - Email Title: Public Water System Risk Assessment
- Conduct Phases 3 & 4 of Risk Assessment methodology development.
- Share thresholds, weighting, and scoring approaches with the public – December 14th webinar workshop.
- Finalize Risk Assessment methodology and conduct Needs Assessment for 2021-22 Fund Expenditure Plan.

Next Steps: Risk Assessment Development Phase 3 - Thresholds

TIERED THRESHOLDS WHERE POSSIBLE



DISTINGUISH BETWEEN THRESHOLD TYPES

Legislative or regulatory defined

Supported by evidence-based studies

Commonly utilized by regulatory agencies

Recognized by sector experience

Next Steps: Risk Assessment Development Phase 4 - Weights

The application of weights to risk indicators and/or risk indicator categories allows the State Water Board to assess all the risk indicators together in a combined Risk Assessment score.

Same Weight



Different Weights



Individual risk indicators can have the same weight or different weights based on comparative criticality.

Same Weight

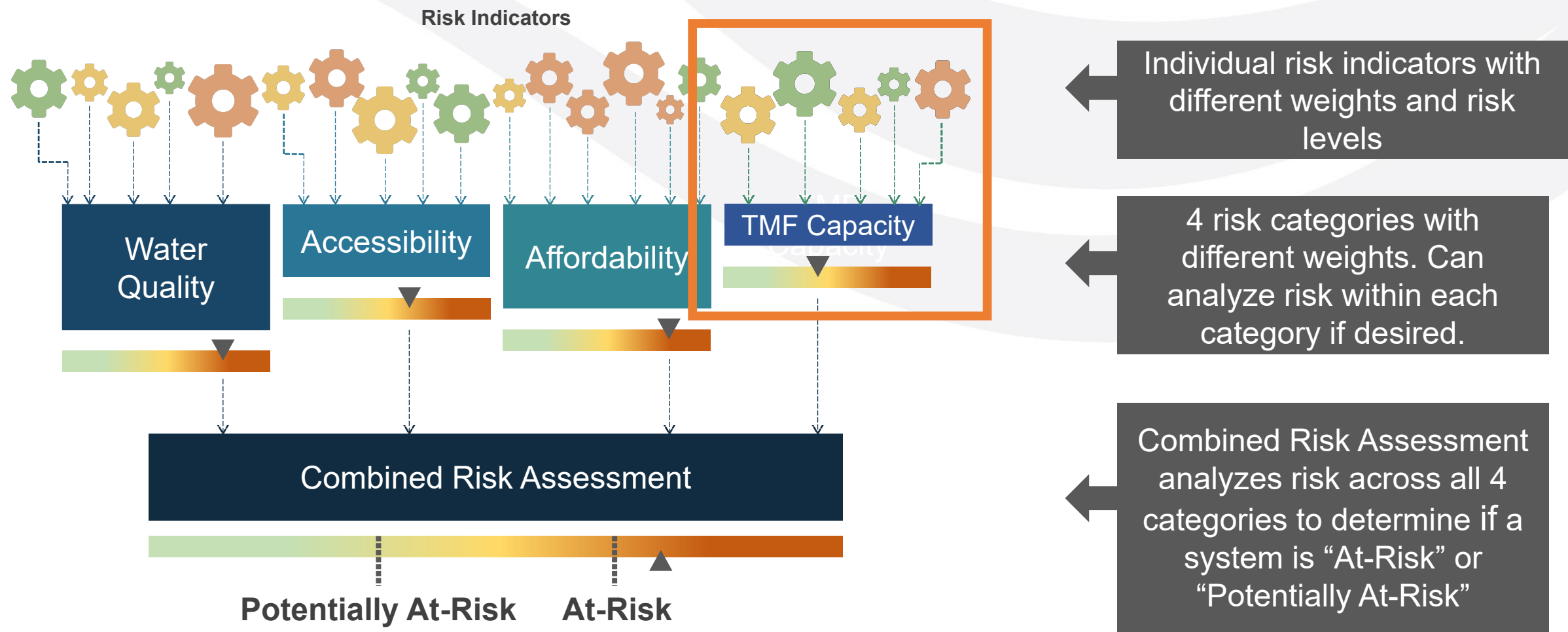


Different Weights



Risk Indicators categories can have the same weight or different weights as well.

Illustration of Risk Assessment Weights



Audience Poll Question 5

Do you support different “weights” for individual risk indicators?

- Yes, I support different weights
- No, all risk indicators should have the same weight
- I need more time consider this question before I can provide feedback

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

Provide a written response to poll questions at the link below by **October 30th**:

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Audience Poll Question 6

Do you support different “weights” for risk indicator categories?

- Yes, I support different weights
- No, all risk indicators should have the same weight
- I need more time consider this question before I can provide feedback

Access White Paper here:

https://www.waterboards.ca.gov/drinking_water/programs/safer_drinking_water/docs/e_p_i_recommendations_risk_assessment_2_public_water_systems.pdf

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Discussion Topic: Weights and Scores

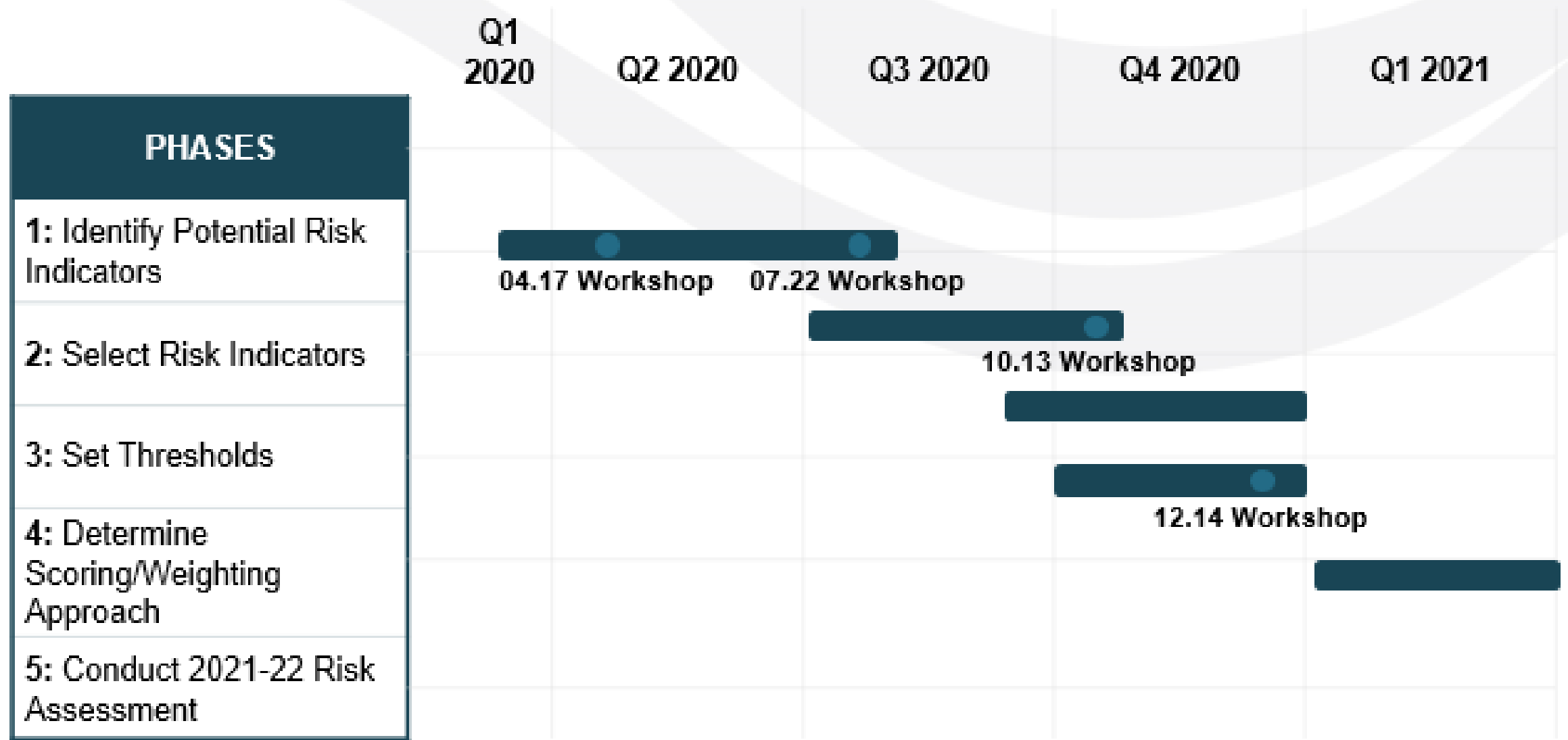
Do you have any recommendations on how the State Water Board should set weights and scores for individual risk indicators and/or risk indicator categories?

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Projected Risk Assessment 2.0 Timeline



Proposed Needs Assessment Timeline

October: Water Rates Dashboard: 10.30
webinar demonstration of the tool developed
by UNC Env. Finance Center.

November: Cost Assessment: 11.20
webinar on in-depth model methodology.

December: Risk Assessment: 12.14
webinar on threshold, weighting, and scoring
approach.

January: Conduct Needs Assessment:

- Conduct **Risk Assessment**.
- Conduct **Costs Assessment**.
- Conduct **Affordability Assessment**.

February

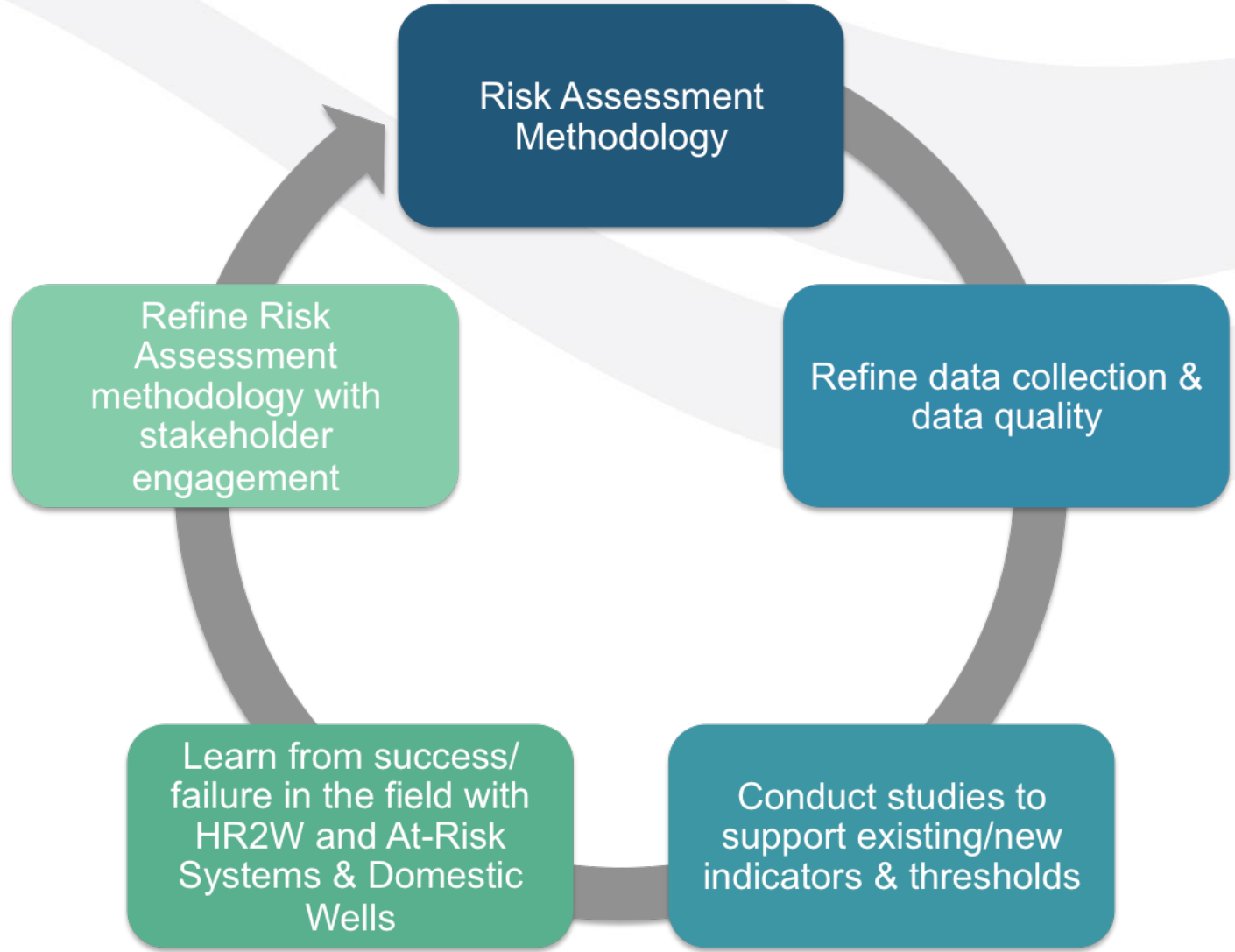
- **Needs Assessment** results delivered to DFA for Fund Expenditure Plan.
- **Cost Assessment:** 02.26 webinar highlighting draft results of potential costs.

March: Needs Assessment contract with UCLA concludes.

April: Draft **Fund Expenditure Plan** released for 30-day public comment.

June: Fund Expenditure Plan considered by Board for adoption.

Risk Assessment 3.0 + Vision for the Future



Discussion Topic: Open Q&A

Do you have any questions or comments about the development of the Risk Assessment methodology?

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Next Steps and Announcements

CALIFORNIA WATER BOARDS

SAFER PROGRAM

SAFER Program Timeline

October 2020

- 8-14th-Ensuring Equitable Engagement in Water Management
- 13th-Risk Assessment Webinar
- 30th-UNC Pilot Financial Dashboard Presentation
- Release Administrator FAQ

December 2020

- 10th- Advisory Group Meeting
- 14th – Risk Assessment Webinar – Threshold & Scoring
- Administrator Public Meetings

November 2020

- 20th-Cost Assessment Webinar
- 30th-SAFER Advisory Group Member selection
- Release Administrator RFP
- Administrator Public Meetings

Early 2021

- POU/POE Pilot Workshop
- Administrator/ Consolidation Public Meetings

Closing Remarks & Gratitude

Thank you!

Questions or comments please contact us:

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