

Draft Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund Response to Comments Received June 16, 2020

Submitted by:	Commenter(s)	Comment Topic	Comment Letter Identifier Number	Comment Number	Summary of Comment Received	Response to Comment
Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	GGRF	1	ACC-01	Address potential Greenhouse Gas Reduction Fund (GGRF) shortfalls, for example, by seeking general fund dollars to back-up any shortages and highlight contingency plans for funding in future discussions and activities.	No revision made. The Fund Expenditure Plan discusses how any funds transferred from the GGRF to the SADW Fund will be prioritized. The State budget process is the appropriate forum for consideration of back-up to any potential shortfalls in GGRF transfers. SB 200 (HSC 116766(g)) requires the Controller to transfer General Fund to the SADW Fund to make up any shortfall in GGRF funds starting in FY 2023/24.
Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	Funding Distribution	1	ACC-02	Prioritize drinking water for local communities who are in crisis and address these needs first, over funding staff positions, in the event that GGRF dollars fall short of expectations. If funding staff remains a priority, accountability in the performance metrics should be prioritized.	Revisions have been made to clarify that staff costs are required to be paid, once program positions are authorized and filled.
Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	Funding Distribution	1	ACC-03	Reduce Administrative costs from ~10% to 5% (as SB 200 only allows for a max of 5%)	No revision made. SB 200 does state that 5 percent go towards administrative costs. However, staff costs include both administering the fund as well as implementation tasks required by SB 200. See also response to CWC-05.
Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	Program Objectives	1	ACC-04	Support for funding long-term solutions that address chronic drinking water programs and agree it is the best course of action for long-term sustainability	No revision made. Comment in support.

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Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	State-Small/Domestic Wells	1	ACC-05	Provide rationale for the \$5 million allocated for state small/systems domestic wells for interim water supplies and emergencies, as it seems low.	No revision made. When the State Board completes its needs assessment and high risk aquifer mapping, staff will have a better basis for making recommendations for future Fund Expenditure Plans. Staff believe that the overall proposed investment in state smalls and domestic wells (\$20 million) is reasoned and measured when compared to the proposed investment in public water systems. The public water systems identified in the Plan have well documented water quality problems, a known impacted population, and solutions that are more readily identifiable; whereas, the impacts and potential solutions for state smalls and domestic wells is much less clear.
Emily Rooney Gail Delihant	Agricultural Council of California (ACC) Western Growers Association (WGA)	State-Small/Domestic Wells	1	ACC-06	Support for the approach for prioritizing solutions for households supplied by state smalls and domestic wells as summarized in section VIII.B of the Draft Plan.	No revision made. Comment in support.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Program Objectives	2	ACWA-01	General agreement with top priorities listed on pg. 11, 12 with suggested edits "...2) addressing community water systems (CWSs) and school water systems consistently out of compliance with primary maximum contaminant level standards, focusing on Disadvantaged Communities (DACs) ; 3) accelerating consolidations, when feasible , for systems out of compliance, at-risk systems, as well as state smalls and domestic wells, focusing on DACs..."	Clarification made - primary drinking water standards rather than primary health standards. Staff do not agree with other changes, which would significantly change the priorities.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Needs Analysis	2	ACWA-02	Support for Drinking Water Needs Analysis to drive solutions-oriented process on pg. 8, 9	No revision made. Comment in support.

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Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Funding Solution List for Out of Compliance Systems	2	ACWA-03	The Solution List for Systems Out of Compliance (Appendix E) should be grouped by solution type, and provide all appendices and tables in excel format on a public website.	No revision made to the way the two solution lists are sorted. Excel versions of the two solution lists will be posted.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Formatting	2	ACWA-04	All tables in the Draft Plan and Appendices that are summarizing financial data should include subtotals of funding amounts.	Tables ES-1, 1, and 3 updated to include subtotal column.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Affordability Threshold	2	ACWA-05	Draft Plan should include an affordability threshold for this first Fund Expenditure Plan that mirrors recognized policy on drinking water affordability thresholds.	Suggestion noted. No revision made to change the affordability threshold being used for the FY 2020-21 Fund Expenditure Plan, however, systems that exceed the suggested threshold of 2.5% are highlighted.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Community Engagement	2	ACWA-06	Support the proposal for an additional stakeholder process for the refinement of the affordability threshold in the future	No revision made. Comment in support.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Program Metrics	2	ACWA-07	Describe how the State Water Board's consultation with the Department of Finance affected the development of the Plan.	Per Health and Safety Code section 116768.5, subdivision (b), the State Water Board must consult with the Department of Finance prior to adopting the Fund Expenditure Plan each year. For the FY 2020-21 Plan, Department of Finance staff reviewed an internal draft of the Plan prior to its public release and met with State Board staff to discuss their comments and recommendations. State Board staff made a number of clarifying edits to the internal draft as a result of the consultation.

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Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Needs Analysis	2	ACWA-08	It is premature to specify numeric goals for dissolution of water systems and consolidation targets as proposed in Section XI. Outcomes, Goals, and Metrics.	No revision made. Staff believe there is sufficient information available to establish the goals set, including information on recent completed consolidations and known pending and potential consolidations.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Program Metrics	2	ACWA-09	As proposed in Section XI.D. Performance Metrics, the metric should refer to "the number of systems" instead of "the number of communities."	Clarification text added as to the definition of 'communities' and that we are using 'communities' to be more inclusive of areas served by state smalls and domestic wells as more of these will be receiving funding as the SAFER Program is implemented.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	O&M	2	ACWA-10	Support for the proposal in Section IX.B. of the Draft Plan that calls for the State Water Board to expand training operations for all facets of operating and maintaining a public water system.	No revision made. Comment in support.
Cindy Tuck Jonathan Young	Association of Water Agencies (ACWA) and California Municipal Utilities Association (CMUA)	Funding Distribution	2	ACWA-11	Revisit allocating 10% of \$130 million in annual funding to staff costs	Text has been modified to clarify that the State Board is obligated to cover staff costs, once positions are authorized and filled.
Kelsey Craig	California Air Resources Board (CARB) Climate Investments Branch	GGRF	3	CARB-01	Identify projects that will be funded by GGRF and indicate whether the project will address climate change adaptation and resiliency or reduce GHGs.	Revised Appendix C to indicate which projects are being funded or partially funded by the GGRF.
Kelsey Craig	California Air Resources Board (CARB) Climate Investments Branch	Program Metrics	3	CARB-02	Support for using climate change resiliency indicators in performance metrics	Clarification text added.
Kelsey Craig	California Air Resources Board (CARB) Climate Investments Branch	Funding Requirement	3	CARB-03	Projects funded by the GGRF should indicate whether they will benefit "priority populations" per AB 1550).	No revision made. This information will be reported to CARB semi-annually for projects funded by the GGRF.
Kelsey Craig	California Air Resources Board (CARB) Climate Investments Branch	Program Metrics	3	CARB-04	Report which specific factors contributed to each of the project selections	No revision made. This information will be reported to CARB semi-annually for projects funded by the GGRF.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Program Objectives	4	CUWA-01	Support for acknowledgment of the limitations of available data for water rates, median household income (MHI), water system boundaries, and census data.	No revision made. Comment in support.

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Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Program Objectives	4	CUWA-02	Support for an emphasis on long term sustainability of funded projects/entities, prioritization of technical assistance for systems struggling to make timely progress toward the implementation of long-term solutions, and requirement to optimize efficiency, consolidate where feasible, or take other actions to reduce O&M costs.	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	O&M	4	CUWA-03	Support for focusing direct O&M support to facilitate voluntary consolidations and assisting larger systems that are integrating smaller water systems.	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Program Objectives	4	CUWA-04	Support for promotion of regional scale solutions that address multiple communities, as opposed to a series of individual projects or services.	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Workforce Development	4	CUWA-05	Support for Inclusion of workforce development efforts to aid with capacity building.	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Funding Distribution	4	CUWA-06	Support for articulation of short and long-term goals for prioritizing funds, responsible management, and timely and expeditious use of funds.	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Community Engagement	4	CUWA-07	Support for holding robust discussion with the Advisory Group and stakeholders in order to develop an appropriate water system- or community-level affordability threshold in the future	No revision made. Comment in support.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Affordability Threshold	4	CUWA-08	Sustainability should be factored into affordability threshold	No revision made. Staff will continue to work with the Advisory Group and other stakeholders on the establishment of an appropriate affordability threshold and staff concur that the sustainability of a system needs to be included in any discussion of affordability.

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Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Project Prioritization	4	CUWA-09	Maintain focus on systems with persistent violations.	No revision made. Projects to address violations of systems out of compliance are a top priority for the SAFER Program. Staff of DFA and DDW consult when discussing systems in violation to determine whether violations are persistent, requiring a large capital improvement project, or intermittent/transitory and potentially requiring operational improvements or more modest capital investments (e.g., new/upgraded equipment).
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Program Objectives	4	CUWA-10	Verify that requirements to make information about water system and source locations available to the public does not undermine a system's risk and resilience assessment (RRA) or emergency response plan (ERP) developed in accordance with America's Water Infrastructure Act (AWIA) of 2018.	No revision made. Recommendation has been provided to Division of Drinking Water and Division of Water Quality staff for their work related to the Needs Analysis.
Cindy Paulson Katie Porter	California Urban Water Agencies (CUWA)	Program Objectives	4	CUWA-11	Explore other actions, other than fining systems, that would provide incentives to complete projects in a timely manner without exacerbating financial challenges that may already be heightened.	No revision made. Recommendation has been provided to Division of Drinking Water staff.
Jennifer Capitulo	California Water Association (CWA)	General Funding Approach	5	CWA-01	Support for the board concepts and priorities of the Plan.	No revision made. Comment in support.
Jennifer Capitulo	California Water Association (CWA)	Affordability Threshold	5	CWA-02	Suggestion to coordinate with the CPUC on the Affordability metric	No revision made. Staff will work with the CPUC and continue to work with the Advisory Group and other stakeholders on the establishment of an appropriate affordability threshold.
Jennifer Capitulo	California Water Association (CWA)	Program Metrics	5	CWA-03	Gather additional appropriate data during the term of the Plan so that more strategic decisions can be made next year.	No revision made. State Water Board Staff will continue to gather information (e.g., via the Needs Analysis) and evaluate the Program (e.g., via implementation) to continue to improve funding strategies for future Fund Expenditure Plans.

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Jennifer Capitolo	California Water Association (CWA)	Program Metrics	5	CWA-04	The Plan is missing a clear strategy on how the SAFER funds will be used to solve the State's drinking water problems and provide safe and affordable drinking water to the maximum number of people, most efficiently. Acknowledgement that this strategy can be developed best over the next couple of years.	No revision made. Staff believe the program priorities provide a strategic direction for use of the SADW Funds, along with complimentary funding. Staff agree that the strategic direction will become more refined and specific as additional data and information are gathered and assessed.
Jennifer Capitolo	California Water Association (CWA)	Affordability Threshold	5	CWA-05	Coordinate with the CPUC to establish a framework for assessing the affordability of utility service, instead of using MHI, as proposed in the Plan.	See response to CWA-05.
Jennifer Capitolo	California Water Association (CWA)	Program Metrics	5	CWA-06	There are severe data gaps and quality issues associated with the data used to identify systems over the 1.5% of the MHI affordability threshold and the list should not be published.	No revision made. Staff will continue to work with the Advisory Group and other stakeholders on the establishment of an appropriate affordability threshold. Providing a list is required by SB 200.
Jennifer Capitolo	California Water Association (CWA)	Affordability Threshold	5	CWA-07	Support for Mesa Water District's comment on the calculation of the cost of residential water (MESA-01) .	No revision made. Staff will continue to work with the Advisory Group and other stakeholders on the establishment of an appropriate affordability threshold.
Jennifer Capitolo	California Water Association (CWA)	Formatting	5	CWA-08	Recommendation to change the name of Appendix F until the Needs Analysis is complete and each system on the list is identified as at risk, because it seems that some proactive systems who applied for funding were labeled at risk even though once the Needs Analysis is complete, they may no longer make the Needs Analysis List.	Appendix F renamed as the Funding Solution List for Potential At-Risk Systems to signal that this list was created based on available information for systems that have applied for funding and was created ahead of the Statewide Needs Analysis. Associated references to the list were also updated in the text.
Jennifer Capitolo	California Water Association (CWA)	Program Metrics	5	CWA-09	Support for streamlining the funding process and recommend that as performance related staff metrics are developed, goals with respect to performance and response are also applied to Technical Assistance Providers and metrics are tracked, and all efforts are held accountable.	No revision made. Recommendation noted.

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Jennifer Capitulo	California Water Association (CWA)	Program Objectives	5	CWA-10	Support for long-term and short-term goals listed in the Plan, however ideally CWA recommends that all systems out of compliance, as opposed to just small, DAC systems, should be included in the short-term goals.	No revision made. The short-term goals align with the program priorities.
Jennifer Capitulo	California Water Association (CWA)	Program Metrics	5	CWA-11	The metric should refer to the "number of systems" instead of "the number of communities". In this way, metrics will show the progress for the systems.	See response to ACWA-09.
David Corey	Central Valley Salinity Coalition (CVSC)	Program Objectives	6	CVSC-01	Support for the Plan's top priorities for FY 2020-21 to address emergency or urgent needs, providing assistance to community water systems and schools that are out of compliance with primary health standards, the acceleration of consolidation for out of compliance systems, and for providing interim solutions and initiating planning efforts for long-term solutions for state smalls and domestic wells.	No revision made. Comment in support.
David Corey	Central Valley Salinity Coalition (CVSC)	State-Small/Domestic Wells	6	CVSC-02	\$5 Million targeted for state small systems/ domestic wells for interim water supplies and emergencies may be low compared to the need. Maintaining flexibility in the budget is essential and recommended so that funds can be redirected as needed.	See response to ACC-05.
David Corey	Central Valley Salinity Coalition (CVSC)	Needs Analysis	6	CVSC-03	Coordinate with CVSV members working on Nitrate Management Zones and Early Action Plans so that drinking water concerns specific to nitrate can be addressed concurrently.	No revision made. Staff will work with CVSV and other stakeholders on these issues.
David Corey	Central Valley Salinity Coalition (CVSC)	State-Small/Domestic Wells	6	CVSC-04	Support for the proposed approach for prioritizing solutions for households supplied by state smalls and domestic wells, and support for partnering with CV-SALTS management groups to conduct initial outreach and partnership efforts with state-smalls and domestic well owners.	No revision made. Comment in support.
J.M. Barrett	Coachella Valley Water District (CVWD)	Program Objectives	7	CVWV-01 (ACWA-01)	General agreement with top priorities listed on pg. 11, 12 with suggested edits "...2) addressing community water systems (CWSs) and school water systems consistently out of compliance with primary maximum contaminant level standards, focusing on Disadvantaged Communities (DACs) ; 3) accelerating consolidations, when feasible , for systems out of compliance, at-risk systems, as well as state smalls and domestic wells, focusing on DACs..."	See response to ACWA-01.

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J.M. Barrett	Coachella Valley Water District (CVWD)	Needs Analysis	7	CVWV-02 (ACWA-02)	Support for Drinking Water Needs Analysis to drive solutions-oriented process on pg. 8, 9	See response to ACWA-02.
J.M. Barrett	Coachella Valley Water District (CVWD)	Funding Solution List for Out of Compliance Systems	7	CVWV-03 (ACWA-03)	The Solution List for Systems Out of Compliance (Appendix E) should be grouped by solution type, and provide all appendices and tables in excel format on a public website.	See response to ACWA-03.
J.M. Barrett	Coachella Valley Water District (CVWD)	Definitions	7	CVWV-04	CVWD recommends additional text in Section III.F “Funding Solution List for Systems Out of Compliance” to differentiate between “safe drinking water” and “whether water delivered by the system poses an immediate health risk.”	Clarifying text added.
J.M. Barrett	Coachella Valley Water District (CVWD)	Formatting	7	CVWV-05 (ACWA-04)	All tables in the Draft Plan and Appendices that are summarizing financial data should include subtotals of funding amounts.	See response to ACWA-04.
J.M. Barrett	Coachella Valley Water District (CVWD)	Affordability Threshold	7	CVWV-06 (ACWA-05)	Draft Plan should include an affordability threshold for this first Fund Expenditure Plan that mirrors recognized policy on drinking water affordability thresholds.	See response to ACWA-05.
J.M. Barrett	Coachella Valley Water District (CVWD)	Affordability Threshold	7	CVWV-07	Add language to the Affordability Threshold explanation regarding which system the affordability threshold is calculated for.	No revision made. Details on the affordability threshold will be added to future Fund Expenditure Plans once one has been established.
J.M. Barrett	Coachella Valley Water District (CVWD)	Community Engagement	7	CVWV-08 (ACWA-06)	Support the proposal for an additional stakeholder process for the refinement of the affordability threshold in the future	See response to ACWA-06.
J.M. Barrett	Coachella Valley Water District (CVWD)	Program Metrics	7	CVWV-09 (ACWA-07)	Describe how the State Water Board’s consultation with the Department of Finance affected the development of the Plan.	See response to ACWA-07.
J.M. Barrett	Coachella Valley Water District (CVWD)	Needs Analysis	7	CVWV-10 (ACWA-08)	It is premature to specify numeric goals for dissolution of water systems and consolidation targets as proposed in Section XI. Outcomes, Goals, and Metrics.	See response to ACWA-08.
J.M. Barrett	Coachella Valley Water District (CVWD)	Program Metrics	7	CVWV-11 (ACWA-09)	As proposed in Section XI.D. Performance Metrics, the metric should refer to “the number of systems” instead of “the number of communities.”	See response to ACWA-09.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Affordability Threshold	8	CWC-01	Support for using the current metric (1.5% MHI Appendix A) as an interim affordability threshold or for systems that have insufficient data available. Coordinate with the advisory committee who can provide input regarding establishing an affordability threshold.	No revision made. Comment in support. See also response to CWA-07.

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Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	General Funding Approach	8	CWC-02	Employ a proactive approach to obtaining applications and requests for funding rather than a passive approach of waiting for systems to submit applications on their own in order to better reach the systems most in need. Include a discussion in the Plan that details a more proactive approach.	Revised text to add new subsection III.E.2 Applying for SAFER Program Funding and added text to Section IX.A on Community Engagement.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	SADW Fund Target Expenditures	8	CWC-03	Provide more details on how the \$10M for construction for state small and domestic well projects will be identified, including if unexpended funds will be carried over to the next fiscal year. Request for the inclusion of unexpended funds in future plans.	Additional explanation regarding the use of the construction funds for state smalls and domestic wells has been added. Although any funds in the SADW Fund that are not encumbered in a given fiscal year are available for future years, there are no carryover provisions for target expenditures for the different expenditure categories identified in the Plan.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Funding Solution List for Out of Compliance Systems	8	CWC-04	Include a more detailed discussion on how systems on the solutions list were identified. The Plan should discuss why some systems are listed on both the out of compliance and the at-risk solution list (East Orosi CSD), as well as include non-transient, non community and transient non-community water systems that serve schools, hospitals, and other community spaces.	Clarification text added to Sections III.F and III.G. The At-risk Solution List has been checked to avoid duplication of systems on both the Solution List for Systems Out of Compliance and At-Risk. Staff do not agree that transient non-community water systems should be added to the list. Schools and community water systems qualify for funding and are listed.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Funding Distribution	8	CWC-05	Differentiate the cost of administering the program (capped at 5%) and program implementation. Priority should be given to funding for emergency or interim solutions.	Additional explanation provided.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Program Metrics	8	CWC-06	Support for streamlining the funding process within the State Water Board	No revision made. Comment in support.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Technical Assistance	8	CWC-07	Support for prioritizing technical assistance for systems that appear to be struggling to make timely progress towards the implementation of long term solutions.	No revision made. Comment in support.

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Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Funding Requirement	8	CWC-08	Waive income requirements for interim solution projects	No revision made. Interim solution project requirements will continue to be evaluated on a case-by-case basis. Since resources for interim solutions are limited, it is important that State Board staff and solution providers confirm households receiving support require the assistance.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Consolidation	8	CWC-09	Consolidation costs should be considered a separate category instead of within the O&M category.	No revision made. It is difficult to separate consolidation costs from the planning, construction, and O&M types of projects. Many consolidation projects include costs associated with physically connecting the water systems, as well as infrastructure upgrades that would be required absent the consolidation.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	State-Small/Domestic Wells	8	CWC-10	Include a discussion on how state small and local water systems and self-supplied communities served by private and domestic wells can apply for funding during FY 20/21	Revised text to add new subsection III.E.2 Applying for SAFER Program Funding.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	State-Small/Domestic Wells	8	CWC-11	Request for creating a list consisting of available, validated databases of state small and local water systems that are known to be out-of-compliance with primary drinking water standards and exceed primary MCLs or with source water exceeding the State Board's previously established hex chrome MCL of 10ppb.	No revision made. Recommendation has been provided to Division of Drinking Water working on the Needs Analysis.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	State-Small/Domestic Wells	8	CWC-12	Request for inclusion of a discussion of water quality testing programs for private domestic wells and state small communities including how quickly such programs could be developed and scaled.	No revision made. Section VIII.B refers to lists of programs available for households supplied by domestic wells (Appendix H) and programs available for households and schools whose tap water contains contaminants (Appendix I).

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Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	CV-SALTS	8	CWC-13	Provide an update on how the SAFER program and CV-SALTS are coordinating and if and how CV-SALTS will be integrated into the SAFER Program.	State Water Board staff are working with the Central Valley Regional Board on how best to ensure the CV-SALTS Management Groups/Early Action Plans are coordinated with the SAFER Program.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Community Engagement	8	CWC-14	Request for increased community capacity building, by adding new metrics related to public and community engagement	Revised bullet in Section XI.D to state that one of the categories of performance metrics that would be developed as the Program is implemented is 'Community engagement effectiveness of the Program (including capacity building)'. No revision made. This recommendation will be considered in the Office of Public Participation's Community Engagement and Outreach Plan which is currently in development.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	COVID	8	CWC-15	During COVID, written materials should be developed and sent to all registered public water systems in order to maximize reach.	No revision made. Comment in support.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Community Engagement	8	CWC-16	Support for the Office of Public Participation's involvement in SAFER meeting facilitation and request for continued focus on resolving access issues.	No revision made. Recommendation noted and will be considered as the pilot projects are developed.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Pilot Projects	8	CWC-17	Pilot projects using POU/POU technology should accomplish the following goals: (1) immediately reduce exposure for vulnerable populations exposed to contaminants; (2) document actual costs to provide reliable and sustainable treatment at the household scale; (3) provide standardized guidance for the broader application of POU/POE solutions. Also fund and encourage pilots in a way that is consistent.	See response to ACWA-09.
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Definitions	8	CWC-18	Define "communities"	

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Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Funding Solution List for At-Risk Systems	8	CWC-19	Recommended including a number of systems in the at-risk solution list, as they exceed the Board's hex chrome MCL.	The Moss Landing Mutual Water Company has been added to the Solutions List for At-Risk Systems. Other systems listed were either not associated with a historic hexavalent chromium problem or are classified as non-transient non-community water systems which are not included on the list (other than schools).
Patricia Avila-Garcia Jennifer Clay	Community Water Center (CWC) and Clean Water Action (CWA)	Funding Solution List for At-Risk Systems/ Funding Solution List for Out of Compliance Systems	8	CWC-20	Poplar CSD is not listed in the at-risk solution list and Elkhorn Rd Water System #4 is not listed in the out of compliance solution list.	No revision made. The Poplar CSD have a monitoring and reporting violation and did not meet other criteria evaluated for the At-Risk Solution List. Elkhorn Rd Water System has a colifom violation, which is currently not a type of violation considered for inclusion on the list of systems out of compliance or human right to water portal data.
Dawn White	Golden State Water Company (GSWC)	General Funding Approach	9	GSWC-01	Agreement with the broad concepts and priorities of the Plan, but request more data be gathered during the term of the Plan, as well as a clear strategy on how the funds will be used.	See response to CWA-03.
Dawn White	Golden State Water Company (GSWC)	Affordability Threshold	9	GSWC-02 (MESA-01)	Determine a water affordability threshold using "the Commodity cost"- the rate charged per unit of water used + the "fixed cost" - water meter charge + "taxes and assessments"- costs paid to the community water system by property owners	See response to CWA-05.
Dawn White	Golden State Water Company (GSWC)	Definitions	9	GSWC-03 (MESA-02)	"Fee" is a misnomer for referring to residential water costs. The use of the word as defined could be confusing and irrelevant to determining a water affordability threshold.	No revision made. Use of 'fees' in text comes from reference to Health & Saf. Code, § 116769, subd. (a)(2)(B)). Recommendation will be noted by Division of Drinking Water staff in their work on the Needs Analysis.
Dawn White	Golden State Water Company (GSWC)	Program Objectives	9	GSWC-04	Support for the inclusion of the appropriate schedule on Pg. 10 and 11.	No revision made. Comment in support.
Dawn White	Golden State Water Company (GSWC)	Funding Distribution	9	GSWC-05	Prioritizing staffing costs seems to be out of alignment with SAFER goals. More detail should be provided on staff costs and activities (e.g. separate admin and implementation costs).	See response to CWC-05.

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Dawn White	Golden State Water Company (GSWC)	Funding Solution List for At-Risk Systems	9	GSWC-06 (CWA-08)	Appendix F should be renamed Needs Analysis until each system currently on the Funding Solution for At-Risk Systems is identified as at risk	See response to CWA-08.
Dawn White	Golden State Water Company (GSWC)	Program Metrics	9	GSWC-07 (CWA-09)	Support for streamlining the funding process, but would also like that as performance related to staff metrics are developed, these should also apply to Technical assistance providers	See response to CWA-09.
Dawn White	Golden State Water Company (GSWC)	Program Objectives	9	GSWC-08 (CWA-10)	Include all systems that are out of compliance in the short-term goals.	See response to CWA-10.
Dawn White	Golden State Water Company (GSWC)	Program Metrics	9	GSWC-09 (CWA-11)	The metric should refer to the "number of systems" instead of "the number of communities". In this way, metrics will show the progress for the systems.	See response to CWA-11.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Community Engagement	10	LCJA-01	Support for improvement in the effectiveness of the last two Advisory Group meetings. OPP is doing a good job in making meetings more productive.	No revision made. Comment in support.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Community Engagement	10	LCJA-02	Work with the residents of Cantua Creek/ El Porvenir and Pixley to identify affordability problems.	No revision made. State Water Board Staff will continue to work with these communities.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Program Objectives	10	LCJA-03	General agreement with top priorities listed on pg. 11, 12 with suggested edits 4) providing interim solutions , and initiating planning efforts for long-term solutions , and funding capital projects for state smalls and domestic wells with source water above a primary MCL.	Revised as suggested.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Project Prioritization	10	LCJA-04	Prioritization for communities struggling with secondary contaminants	No revision made. Solutions for systems out of compliance and at risk of failing to provide safe drinking water are considered priorities for the SAFER Program.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Funding Distribution	10	LCJA-05	Funding targets in Table ES-1 for public water systems appear appropriate	No revision made. Comment in support.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Funding Distribution	10	LCJA-06	Appreciate the focus on at-risk water systems evidenced by the funding targets in Table ES-1.	No revision made. Comment in support.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	State-Small/Domestic Wells	10	LCJA-07	Communities served by state small water systems and domestic wells do not appear to be adequately prioritized. funding for state smalls and domestic wells, especially for technical assistance and planning, must also be a priority.	See response to ACC-05.

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Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	POU/POE	10	LCJA-08	Support for the \$3.2 million targeted for pilot projects to provide POU/POE, filtration and to provide direct operations and maintenance support to increase affordability drinking water	No revision made. Comment in support.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Pilot Projects	10	LCJA-09	Reframe the discussion of a pilot to increase access to drinking water for those experiencing homelessness to presume that a pilot will be funded.	No revision made. Staff are not presuming that a pilot project using the SADW Fund will be initiated this fiscal year.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	O&M	10	LCJA-10	Supporting O&M to facilitate consolidation should be a focus of the Fund, but we caution that the SWRCB should not provide the receiving water system with a windfall	No revision made. Recommendation noted.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	O&M	10	LCJA-11	Recommend including direct support for O&M related to ongoing treatment as a focus of The Fund.	No revision made. Staff anticipate that the Statewide Needs Analysis will include identification of direct O&M support needs, including needs associated with ongoing treatment costs.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Formatting	10	LCJA-12	We ask for the addition of a table showing estimates of how these additional funds [complementary funds] will be expended (e.g., on systems out of compliance, at risk water systems, state smalls & domestic wells, with the amounts used for interim water supplies, technical assistance, planning and capital projects for each), similar to Table 3.	No revision made. It is difficult to anticipate the types of projects that will be funded by the other complementary funding sources due to program-specific requirements and application processes. The Drinking Water SRF IUP was recently adopted by the State Water Board includes modifications to priorities and funding caps and it is not clear how those changes could impact the relative distribution of SRF and bond funds to projects. Staff will work on developing reports for the Advisory Group or Executive Director's report that will provide updates on how complementary funds are expended in those categories.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Formatting	10	LCJA-13	Tables in the Draft Expenditure Plan should include subtotals. For example, Table 3 should have a new column showing the total targets for out-of-compliance systems, at risk systems and state smalls and domestic wells.	See response to ACWA-04.

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Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Affordability Threshold	10	LCJA-14	Communities that are impacted by unaffordable water rates due to past debts or current O&M costs should be prioritized for funding.	No revision made. Suggestion noted.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Affordability Threshold	10	LCJA-15	We appreciate the use of community MHI rather than statewide MHI, but the proposed approach masks system-level unaffordability problems	See response to CWA-07.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Affordability Threshold	10	LCJA-16	Concern regarding the use of 6 CCF for the affordability threshold	See response to CWA-07.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Affordability Threshold	10	LCJA-17	Do not support the stakeholder comments at the Advisory Group meeting and Questions & Answers session on June 12 in support of using 2.5% MHI	See response to CWA-07.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Affordability Threshold	10	LCJA-18	Provide more information regarding water rates and household income, especially for the 1,140 community water systems for which the SWRCB lacks rate data.	No revision made. Additional water rate information will be collected with the Needs Analysis and included in future Fund Expenditure Plans.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Workforce Development	10	LCJA-19	Support for workforce development	No revision made. Comment in support.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Funding Distribution	10	LCJA-20	We do not agree that staff costs should be prioritized over emergency drinking water solutions and interim water supplies, which also cannot be interrupted or provided inconsistently.	See response to ACC-03.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Funding Distribution	10	LCJA-21	Provide more information in the Draft Expenditure Plan on the portion of staff costs subject to the administrative cap in SB 200 versus staff costs that are not administrative in nature.	See response to CWC-05.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Project Prioritization	10	LCJA-22	<p>Suggestion for prioritizing funds for public benefits: Long-Term</p> <ul style="list-style-type: none"> ○ Within five years, no public water systems in the state will be out of compliance with a primary drinking water standard. ○ Reduce energy use by and/or support investments in renewable clean energy sources (e.g., solar) for water systems serving disadvantaged communities. ○ Increase consumer confidence in and reliance on tap water as a safe drinking water source, reducing reliance on bottled water 	Staff have incorporated the suggestions in the second two bullets. Staff have set a four-year goal of all systems currently out of compliance having long-term solutions underway, which staff feel is aggressive and achievable.

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Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Project Prioritization	10	LCJA-23	<p>Suggestion for prioritizing funds for public benefits: Short Term</p> <ul style="list-style-type: none"> ○ Within two years, ten communities served by domestic wells and/or state small water systems exceeding a primary drinking water standard, where consolidation is not feasible, will be implementing drinking water solutions. ○ Within two years, prevention of primary MCL violations for at least 100 at risk water systems. ○ Within four years, thirty communities served by domestic wells and/or state small water systems exceeding a primary drinking water standard, where consolidation is not feasible, will be implementing drinking water solutions. <p>And addition of two more:</p> <ul style="list-style-type: none"> ○ Reduction in construction application review times from the current six to nine months to three months. ○ Reduction in time needed to approve work plan amendments and technical assistance contracts by 50%. 	Staff do not believe there is a sufficient basis for establishing the suggested short-term goals for at-risk systems or the state smalls/domestic well communities. State small/domestic well communities first need to be identified and the community engaged before solutions can be implemented. Staff do not currently have an assessment of systems at risk of primary MCL violations, so do not feel it is appropriate to establish such a goal. Although staff is committed to reducing processing times, staff do not feel that specific numeric goals can be set given uncertainty related to COVID-19 restrictions and impacts to staffing due to budget challenges.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Program Metrics	10	LCJA-24	<p>Additional Metrics:</p> <ul style="list-style-type: none"> ● The number of communities that have water rates reduced below the affordability threshold because of, in whole or in part, Fund investments. ● The number of households formerly reliant on domestic wells that are now served by public water systems. ● For climate adaptation, include measures of both reduction in energy use and adaptation/resilience. We are interested in discussing options with staff and stakeholders. 	The Policy for the Development of the Fund Expenditure Plan identifies the metrics to be used in the Plan. The suggested metrics can be considered as part of any future updates to the Policy.
Michael Clairborne	Leadership Counsel for Justice and Accountability (LCJA)	Appendices	10	LCJA-25	Include a funding solutions list for communities reliant on domestic wells and state small water systems in the appendices	No revision made. Will consider this type of list to be included after the Needs Analysis is completed.
Paul E. Shoenberger	Mesa Water District (Mesa Water)	Affordability Threshold	11	MESA-01	Determine a water affordability threshold using "the Commodity cost"- the rate changed per unit of water used + the "fixed cost" - water meter charge + "taxes and assessments"- costs paid to the community water system by property owners	See response to CWA-05.
Paul E. Shoenberger	Mesa Water District (Mesa Water)	Definitions	11	MESA-02	"Fee" is not used amongst water industry professionals to describe residential water service charges. It is used to refer to occasional or one-time charges, such as: developer fees, late fees, penalty fees	See response to GSWC-03.

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Paul E. Shoenberger	Mesa Water District (Mesa Water)	Affordability Threshold	11	MESA-03	Support for the proposal for an additional stakeholder process to further develop the affordability threshold	See response to CWA-07.
Kevin Phillips	Paradise Irrigation District (PID)	Funding Distribution	12	PID-01	Request that the State Water Resources Control Board provide sufficient flexibility to potentially allow for funding to PID as part of the 2020 Fund Expenditure Plan ("Plan"), should it be necessary	No revision made. Staff will continue to work with PID on addressing infrastructure needs, but do not feel the requested direct O&M support is consistent with the proposed program priorities.
James Peifer	Regional Water Authority (RWA)	General Funding Approach	13	RWA-01	RWA was a supporter of SB 200 (Monning, Chapter 200, statues of 2019), and is an advocate for full funding of the Safe and Affordable Drinking Water Fund in the 2020-2021 state budget cap and trade program.	No revision made.
James Peifer	Regional Water Authority (RWA)	Other	13	RWA-02 (ACWA-01-ACWA-11)	Aligns its self with the comments made by the Association of California Water Agencies (ACWA) and the California Municipal Utilities Association (CMUA), both in their comment letter and in their comments presented at the June 12th meeting	No revision made.
James Peifer	Regional Water Authority (RWA)	Program Metrics	13	RWA-03	RWA generally agrees with the top priorities in the plan, however those priorities should clearly express the need to reach the greatest number of individuals in disadvantaged communities (DAC) balanced with addressing the most severe health risks and the cost of reliable access. As part of reaching the most people in the least amount of time it will be important to track how the FEP is performing in relation to the cost effectiveness and administrative efficiency metrics	No revision made. The recommendation is consistent with the overall SAFER Program goal o provide safe drinking water in every California community, for every Californian and aligns with the stated priorities for FY 2020-21.
James Peifer	Regional Water Authority (RWA)	Funding Distribution	13	RWA-04	Specify and make publicly available what amount of funds are going to administration and what are going to implementation to ensure compliance with SB 200	See response to CWC-05.
James Peifer	Regional Water Authority (RWA)	Program Metrics	13	RWA-05	Foundational data underlying funding decisions must be refined and improved moving forward.	No revision made. Recommendation noted.

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James Peifer	Regional Water Authority (RWA)	Funding Solution List for At-Risk Systems	13	RWA-06	RWA suggest naming appendix F “Potential at risk based on previous funding applications”. Additionally, the FEP states “The “At-Risk” systems that would be the focus of interim water supplies are those with source water exceeding the State Water Board’s previously established hexavalent chromium MCL of 10 parts per billion (ppb).” Given that no systems in Appendix F are shown to have applied for funds based on hexavalent chromium it would be helpful if there is further information on which systems will have access to funds for interim water supplies.	See response to CWA-08 for renaming the 'At-Risk' list. As discussed in Section III.E., water systems with populations of less than 1,000 that have exceeded the previously established hexavalent chromium MCL would qualify for interim water supplies.
James Peifer	Regional Water Authority (RWA)	Pilot Projects	13	RWA-07	Support for the inclusion of pilot projects in the first FEP.	No revision made. Comment in support.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	GGRF	14	RCRC-01	Caution the use of certain GGRF protocols and procedures commonly used by CARB, as they might be harmful to providing safe and affordable drinking water (ex. Linking GGRF funds to CalEnviroScreen)	No revision made. Projects funded by the GGRF will need to follow the reporting requirements and funding guidelines of California Climate Investments, in addition to the requirements specified in SB 200. Projects funded by the SAFER Program will also be consistent with the Program's priorities of providing safe and affordable drinking water, primarily to disadvantaged communities.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	GGRF	14	RCRC-02	Funding safe drinking water solutions in DACs MUST focus on those communities identified through the explicit criteria in the Water Code and should not be done through CalEnviroScreen's air quality nonattainment lens.	See response to RCRC-01. Staff will use the program priorities established in the Fund Expenditure Plan to guide decisions on project funding. Consideration of air quality nonattainment is not one of the priorities.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	Funding Distribution	14	RCRC-03	The “Funding Capacity and Distribution of Funds” omits the mention of O&M as a priority and should be explicitly included.	Where funding of O&M is necessary to achieve the identified priorities, such funding will be provided (e.g., to facilitate consolidation efforts). Staff anticipate pilot efforts will include projects that provide direct O&M support.

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Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	O&M	14	RCRC-04	Direct O&M support should not be withheld to smaller standalone systems as a matter of policy. We encourage the State Water Resources Control Board (SWRCB) to consider that when capital investments are made pursuant to the larger suite of options under the Safe and Affordable Funding for Equity and Resilience program long-term O&M capabilities be taken into consideration.	When reviewing construction applications, staff review the life cycle costs, ongoing O&M costs, and the technical, managerial, and financial capacity of the system to manage the project over the long-term. The Policy for the Fund Expenditure Plan adopted by the State Water Board in May includes direct O&M support. This year's proposed plan includes direct O&M support to facilitate consolidations and as part of pilot project efforts.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	Consolidation	14	RCRC-05	Address some of these complicating factors for impacted ratepayers and water systems with regards to consolidation (e.g. prop 218 and prop 26) and to ensure that adequate funding is made available so that consolidations may be a real, financially and legally viable option	Staff work with technical assistance providers and water systems on a project specific basis in addressing these issues. Funding support includes conducting rate studies and assisting water systems through the Prop 218 process.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	Technical Assistance	14	RCRC-06	More emphasis on Technical Assistance for small DAC water systems during the planning phase would be a valuable undertaking and would put these systems on a more expeditious path toward safe drinking water.	No revision made. Considerable investments have been made in FY 2019-20 for additional planning support through existing Technical Assistance providers.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	Affordability Threshold	14	RCRC-07	Review and refine the affordability threshold (i.e. through consultation with the Advisory Group)	See response to CWA-07.
Mary-Ann Warmerdam	Rural County Representatives of California (RCRC)	Administrators	14	RCRC-08	Using state-appointed Administrators sparingly and after exhausting community outreach efforts to minimize disruption.	No revision made. Recommendation has been provided to Division of Drinking Water staff.
Paul J. Rowe	State Water Resources Control Board (SWRCB)	Definitions	15	SWRCB-01	Revise last paragraph of the first page: purposes of the Plan are to: (1) identify public water systems (PWS), community water systems (CWS), state small water systems...", and remove CWS because a CWS is PWS.	Revised as suggested.
David Loveday	Water Quality Association (WQA)	POU/POE	16	WQA-01	WQA supports the use of certified POU/POE water treatment systems for interim and potential long-term solutions.	No revision made. Comment in support.

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David Loveday	Water Quality Association (WQA)	POU/POE	16	WQA-02	To ensure the safety of products we would also recommend the plan include language that if POU/POE technology is used, its products are required to be certified by an ANSI accredited certification body, like WQA's Gold Seal Product Certification Program. If the product is installed in a residential application, it should be registered with California's Water Treatment Devices Registration Program.	No revision made. The recommendation will be reviewed by State Water Board staff when POU/POE projects are funded.
David Loveday	Water Quality Association (WQA)	POU/POE	16	WQA-03	Any program should contain the following components: a. An initial assessment / test of the consumers drinking water to first identify the water quality so as to determine the appropriate water treatment solution; b. A consultation with a water utility or a licensed and certified water professional to assist in selecting an appropriate treatment solution; c. Installation of third-party certified water treatment solution by a licensed and certified water professional d. A water quality monitoring program that includes an on-site visit by a licensed and certified water professional; and e. If necessary, an on-site visit by a licensed and certified water professional to replace and/or exchange, and reclaim water treatment equipment, including expired filters.	See response to WQA-02.
David Loveday	Water Quality Association (WQA)	POU/POE	16	WQA-04	WQA will assist in community outreach efforts to discuss the development of potential pilot opportunities.	No revision made. Recommendation noted by State Water Board staff.