

## FY 2025-26 Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund

### Response to Comments Received July 31, 2025

No.	Comment Topic	Date of Comment	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to FEP - Section and pg. #
1	Construction - Cost per Connection	7/25/2025	San Joaquin Valley Water Collaborative Action Program	SWB must limit which funds are counted towards the cost per connection limit. SWB must amend the calculation to remove interim assistance, technical assistance, and administrators from the methodology and limit the methodology to planning and construction costs.	In Section IV.B.4 of the FEP and Section V.A.5 of the DWSRF IUP, a revision was made to clarify when the start of five years occurs, as well as a revision to the calculation to include only construction costs (i.e., exclude technical assistance, planning, and administrator costs).	Section IV.B.4, pp. 66-68.
2	Interim Assistance	7/25/2025	San Joaquin Valley Water Collaborative Action Program	SWB will transition households off of SAFER-funded interim assistance when a long-term solution has been completed, there is an existing mitigation program, after two years, or if a household no longer qualifies. The SWB should continue to develop these qualifications with stakeholders to make clear when SAFER funding will cease without causing disruption to households. Where there is the presence of co-contaminants or other issues, the SWB must continue to coordinate and provide some resources for interim relief.	DFA staff do plan to continue coordination with funding partners and local mitigation programs, where they exist, to minimize any potential disruptions in services to households. DFA staff will also continue to coordinate with DDW, TA providers, and communities/recipients, on long-term solutions. FEP text will be clarified around these points.  DFA staff will also reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	Sections VI.B.1 and VII.B.1.
3	Interim Assistance	7/25/2025	San Joaquin Valley Water Collaborative Action Program	The SWB should not automatically remove residents from an interim solution after two years. The SWB should work to aggressively move communities on interim relief towards long-term solutions by improving the process to move from TA to planning and construction, working with existing mitigation programs to understand their needs and limitations, and appointing more administrators to help push systems towards success.	See response to comment 2.	Sections VI.B.1 and VII.B.1.
4	Interim Assistance	7/25/2025	San Joaquin Valley Water Collaborative Action Program	The FEP suggests that a more robust domestic well/state small water system strategy is going to be developed. The SWB should adopt a timeline to develop these strategies with stakeholders.	The FY 2025-26 FEP is the first iteration of a public-facing strategy for the State Water Board around its work in DW/SSWS communities. It is expected that this strategy will evolve and improve based on stakeholder input for future annual FEPs.	None.

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5	Education and Outreach	7/30/2025	Self-Help Enterprises	<p>There is a concerning lack of mention of educational programs throughout the FEP document, especially for DW/SSWSs. Several SHE Groundwater Sustainability (GSA) partners have emphasized the critical nature of educational programs as they ensure the sustainability of the communities we serve. DFA has emphasized the importance of prioritizing goals of the public partners, and we feel that there should be alignment between DFA and the GSAs on this educational component.</p> <p>Additionally, inclusion of educational programs focused on stewardship of water infrastructure and natural resources as well as community leadership will assist the SAFER program in achieving Goal 3: California's most vulnerable communities are transitioning to be resilient and prevent cycles of failure (Section II.A.).</p>	Educational programs are meant to be included in the first pillar of the DW/SSWS strategy. FEP text will be clarified as appropriate.	Section II.C and elsewhere, as appropriate.
6	Interim Assistance - GSAs & Mitigation Programs	7/30/2025	Self-Help Enterprises	Requesting clarification: When a GSA has allocated funding to a mitigation program, but the subbasin is facing potential probation, is this considered an "implemented plan"?	<p>Clarification made.</p> <p>State intervention does not stop a GSA from implementing projects and management actions (such as a mitigation plan) or change a GSA's regulatory authorities. Continued local implementation of funded mitigation programs may help GSAs exit State Water Board intervention more quickly than they would otherwise: GSAs might not be able to exit intervention until they provide assurance that their GSPs can be successfully implemented in a manner that is likely to achieve the sustainability goal.</p>	Section VII.B.1., p. 83.
7	Interim Assistance - GSAs & Mitigation Programs	7/30/2025	Self-Help Enterprises	Requesting clarification: If a GSA enters probation and is unable to implement its mitigation program, will additional funding be made available to support households that may be transferred to existing regional programs?	See response to comment 6.	None.
8	Domestic Wells & State Smalls	7/30/2025	Self-Help Enterprises	Section I.B.2. STATE SMALL WATER SYSTEMS & DOMESTIC WELLS: This section affirms DFA's focus on water systems and domestic wells that are failing due to drought and lowering groundwater levels. However, these two impacts are just a segment of the water-related emergencies that SHE addresses. We recognize there are limitations to accessing specific data on other potential factors, but it bears reminding that wells fail due to many factors, including mechanical, seismic, electrical, etc.	Comment noted.	None.

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9	Education and Outreach	7/30/2025	Self-Help Enterprises	Section I.C. SOLUTION TYPES FUNDED BY THE SAFER PROGRAM: Educational components for DW/SSWS are not included in the bullet points for any of the solution types, and we believe that education around operation and maintenance for DW/SSWS is key to ensuring the sustainability of the solutions implemented. We recommend a bullet point under this section and will provide comment on other sections where educational components can be incorporated.	See response to comment 5.	Section II.C and elsewhere, as appropriate.
10	SAFER Goals & Strategy	7/30/2025	Self-Help Enterprises	Section II.B. PUBLIC WATER SYSTEM STRATEGYWhile we appreciate that the current objectives focus on bringing failing systems back into compliance, we have concerns that the objectives do not take into consideration the nuances and obstacles that small, rural DACs face as they work through a solution. We anticipate that these are the systems that will struggle to meet the five-year deadline on a compliance order or the 2.5 years for planning. As these systems are the ones that depend on State Water Board support and funding, there should be an objective focused on improving internal systems within the State Water Board to help struggling systems meet these objectives.	Appendix G includes a table which describes improvement made since FY 2019-20 relative to the funding process phases to streamline internal processes and coordination. To date, there have been about 80 process improvements implemented with another 17 being developed.	None.
11	Domestic Wells & State Smalls	7/30/2025	Self-Help Enterprises	Section II.C.1.: SHE holds the privacy of participants' data in high regard and is not able to share data without close adherence to SHE's Open Environment Data Project Data Values Statement. Each event of data distribution must be justified by specific circumstances related to its intended application, and SHE will not engage in mass distribution of participant data without explicit consent from each participant, which ensures that decisions made uphold the participants' well-being, safety, and dignity as our highest priority. Additionally, for Action 2, we recommend the inclusion of a timeline to expect the guidelines and best practices and clarification on whether there will be accompanying metrics once the guidelines are available.	<p>The SWB also shares the importance of sharing data in the most appropriate manner that is cognizant of participants privacy.</p> <p>DFA staff will be working towards further developing this initial DW/SSWS strategy based on stakeholder input and discussions with updates to be provided in future FEPs.</p>	None.

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12	Domestic Wells & State Smalls	7/30/2025	Self-Help Enterprises	<p>Section II.C.2. - Clarification on the following questions:</p> <ul style="list-style-type: none"> <li>• Will ensuring co-funding and establishing co-funding agreements be the responsibility of the parties funded by SAFER, such as SHE? Will SAFER staff be responsible for ensuring the existing party's willingness to enter into a co-funded agreement?</li> <li>• Will funded parties receive a comprehensive list of existing funded efforts outside of SAFER?</li> <li>• Self-Help Enterprises anticipates significantly increased time and resources to administer regional programs due to the increased coordination with regulated entities, DW/SSWS impact evaluation, ensuring the appropriate entity provides interim and long-term services, and avoiding duplication of benefits. Will funding be available to support this increased level of services?</li> <li>• Will interim solutions be available for participants during the extended timeframe to ensure co-funding is executed?</li> </ul>	Comments noted. DFA staff will continue to work closely with funding partners on these topics and understand the need for flexibility during any transition period from a State Water Board-funded program to a local mitigation program. Co-funding agreements would be based on discussion between those parties and Water Board staff. A list of existing funding efforts outside of those currently funded by the State Water Board is being compiled.	None.
13	Domestic Wells & State Smalls	7/30/2025	Self-Help Enterprises	<p>II.C.3. In order to appropriately leverage funds to meet these expectations, SHE requests a succinct list of qualifying criteria for "financially and technically feasible" projects. The Actions for this strategy seem to focus on connecting DW/SSWS to existing public water systems, which may not always be feasible. We recommend the addition of an Action to develop and implement an educational component for those who may need to remain on DW/SSWSs.</p>	See comment 11. Some clarifying text was added.	Section II.C, p. 19
14	Project Milestone Tracking	7/30/2025	Self-Help Enterprises	<p>Section III.D. PROJECT MILESTONE TRACKING - Proposed edits to milestones:</p> <p>No phase seems to include interim solutions, which is an important element to ensure that a reliable supply of drinking water and water for sanitary uses are available until a long-term solution is identified. The addition of a standalone interim solution phase or the inclusion of interim solutions into Phase 2 is recommended to best coordinate the interim solution for each community, as needed.</p>	The project milestones are meant to facilitate tracking of the implementation of a long-term solution. The State water Board has additional data tracking to indicate if interim assistance is being provided to the community.	None.

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15	Project Milestone Tracking	7/30/2025	Self-Help Enterprises	Section III.D. PROJECT MILESTONE TRACKING - Proposed edits to milestones: Phase 2 – This phase should be split into two phases: Select a Solution and Completing Planning Tasks. The Select a Solution phase should focus on determining the feasibility of all alternatives to resolve the issue and have a clear end when a solution is identified. The Completing Planning Tasks phase would include the development of design documents, environmental documents (not currently listed), and any other components needed to complete a construction application.	Comments noted. DFA staff will continue to work closely with funding partners to refine project milestone tracking and reporting. State Water Board staff will be meeting with funding partners this fiscal year to discuss opportunities to enhance project milestone tracking for future FEPs.	None.
16	Project Milestone Tracking	7/30/2025	Self-Help Enterprises	Section III.D. PROJECT MILESTONE TRACKING - Proposed edits to milestones: Phase 3 or 4 – Neither phase includes application review explicitly, so we recommend adding application review to Phase 4 or be added as a phase between Phases 3 and 4. Application review can present obstacles to projects for small DACs that have limited technical, managerial, and financial (TMF) capacity.	Application review is captured within Phase 3. The State Water Board will be developing and publishing sub-tasks associated with each milestone phase to capture this information.	None.
17	Project Milestone Tracking	7/30/2025	Self-Help Enterprises	Section III.D. PROJECT MILESTONE TRACKING - Proposed edits to milestones: Phase 6 – We recommend adding an explicit reference to the Final Budget Approval since many systems rely on that approval before moving into the construction phase. It is also a process where delays have occurred.	See comment 16. The State Water Board will be publishing sub-tasks associated with each milestone phase to capture this information.	None.
18	SADW Fund Targets	7/30/2025	Self-Help Enterprises	Section V.B.1. FY 2025-26 SADW FUND TARGET SUMMARY Under the Technical Assistance section, there is a bullet point stating that generally TA Providers are “at, or near, their capacity to manage their current workload, let alone take on significant additional workload” when it comes to supporting At-Risk systems. We would like to get more clarity on this statement as we are unsure if the “capacity” references funding capacity or work force capacity, both of which we are able to address. We believe that some of the non-profit TA Providers may be better poised to work with At-Risk systems where additional community education and outreach is needed, and we encourage the State Water Board to continue investing in non-profit TA providers.	Revision made.	Section V.B.1, p. 43
19	Funding Eligibilities	7/30/2025	Self-Help Enterprises	Section VI.A. ELIGIBLE PUBLIC WATER SYSTEMS GSAs are included in the list of eligible entities to receive SADW funding. Please clarify what types of projects and under what specific circumstances GSAs would be eligible for funding.	GSAs are eligible to directly receive SADW funding for any eligible project type included in Sections VI and VII of the FY 2025-26 FEP.	None.



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20	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.1. INTERIM AND EMERGENCY ASSISTANCEWe appreciate the explicit inclusion of certain small PWS in the eligibility for interim water supplies. This section states that household income will be verified to provide interim water supplies, but we believe that in a DAC PWS all households should be eligible for interim water supply as all the households are impacted by the acute contamination within the system. Collecting household income may also discourage households with a true need for the program to sign up, and it may create an administrative burden on existing programs. Similar to other parts of the SAFER/SRF programs, for a PWS, income eligibility should be determined at the community, not household, level.	Clarification made to Section VI.B.1 to allow small PWSs that serve a DAC to be eligible for interim water supplies for any customer of that PWS.	Section VI.B.1, p.50
21	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.1. INTERIM AND EMERGENCY ASSISTANCEWe note that addressing emergencies for PWS places a burden on SHE's existing regional (DW) program, and to better address the emergencies, a separate agreement for community water systems would help to better allocate staff and other resources.	DFA staff are working with SHE to develop and execute a separate funding agreement for emergency services, expected in Fall 2025.	None.
22	Interim Assistance	7/30/2025	Self-Help Enterprises	In the situation where another entity is implementing a mitigation program, please clarify the scope of assistance that will be covered by each entity and whether DFA or the funded party will be responsible for conducting scope assessments of secondary mitigation programs.	As these situations come up, DFA staff will work closely with both the funding partner and the local mitigation program to get to an appropriate path forward.	None.
23	Interim Assistance	7/30/2025	Self-Help Enterprises	On Table 7, the language under the "Duration" column for existing enrollees where no other local interim program exists needs to be revised for clarity. SHE also recommends adding a section for new enrollee where a local mitigation program exists, but the enrollee does not qualify.	Clarifications made to Table 7.	Section VI.B.1, Table 7, pp.51-53.
24	Interim Assistance	7/30/2025	Self-Help Enterprises	Two years of interim assistance is not sufficient. In the context of interim solutions for PWS, a more reasonable timeline is five years.	Clarifications made to Table 7.	Section VI.B.1, Table 7, pp.51-53.
25	Interim Assistance	7/30/2025	Self-Help Enterprises	On page 52, SHE's service area is identified as the "Central Valley", but it should read as San Joaquin Valley, since SHE does not serve the northern Central Valley.	Revision made.	Section IV.B.1, p. 53.
26	Technical Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.2 TECHNICAL ASSISTANCEOn Table 8, Self-Help Enterprises is listed as having \$18.6 M in available funding, but that funding is not yet available as we are still going through the contract amendment process. We request the addition of a footnote stating that the funding will be available following execution of the contract amendment later in the fiscal year.	The amounts shown in Table 8 reflect amounts in existing TA master agreements that is not committed to existing work plans and has not been disbursed. Table 8 will be updated to reflect the amounts remaining as of June 30, 2025.	Section VI.B.2, Table 8, p. 56

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27	Technical Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.2 TECHNICAL ASSISTANCE Figure 30 is helpful to establish the steps within TA. However, the figure has linear steps with a timeline that adds up to between 42 and 54 months for the feasibility to planning stage, which does not align to the 2.5 years (30 months) planning timeline that was stated in the objectives under Section II.B. If there are overlaps in those steps, we recommend a different model be selected to better show the actual proposed timeline for planning.	Figures have been revised to remove typical timelines for tasks. TA Staff will coordinate directly with Providers to determine expected timelines for deliverables.	Section VI.B.2, Figure 32, pg. 62.
28	Technical Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.2 TECHNICAL ASSISTANCE Criteria to move from one step to the next is included, but to our understanding, the work plans that TA Providers must submit will not follow the same steps and instead include all steps from the beginning. While we understand that the State Water Board is attempting to reduce the number of work plan amendments processed, we believe that following the steps in Figure 30 to develop work plans will lead to better budgeting and timeline determinations.	The criteria to move forward does not limit what steps are included into a work plan. Rather they are there to ensure that certain conditions are met before a project proceeds. TA staff will work with providers to incorporate the criteria when developing work plans.	None.
29	Technical Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.2 TECHNICAL ASSISTANCE We appreciate the inclusion of Table 10. Feasibility Study vs. Engineering Report Components, as it provides much needed clarity on the distinction and connection between the two reports.	Comment noted.	None.
30	Technical Assistance	7/30/2025	Self-Help Enterprises	Section VI.B.2 TECHNICAL ASSISTANCE The description for Figure 31 states that the “timing from submittal of a TA request through assignment and execution of a work plan can range from one to three months.” That timing does not align to actual expectations of TA Providers for developing work plans or State Water Board staff tasked with reviewing work plans. While a one-to-three-month timeline would be ideal, we recommend the timing be re-evaluated to consider the ten-week timeline for non-profit TA Providers to develop work plans.	Timing noted in the figure description updated to "10 to 12 weeks".	Section VI.B.2, p. 63.
31	Construction	7/30/2025	Self-Help Enterprises	Section VI.B.4. CONSTRUCTION We appreciate the new layout and categories described in Tables 12 and 13 for funding limits and eligibility criteria, respectively. These changes make it easier to determine approximate funding and eligibility for projects that we support.	Comment noted.	None.

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32	Construction	7/30/2025	Self-Help Enterprises	Section VI.B.4. CONSTRUCTION The Typical Construction Funding Process should more clearly outline the expected timeline for each of steps in the construction funding process under Figure 33. The description includes a six-to-twelve-month timing for going from a complete application to a funding agreement, but it is unclear whether that timing includes application review.	Comment noted. Clarification has been added to the description of the figure indicating the timeline includes application review.	Section V1.B.3, Figure 33, p. 65
33	Construction	7/30/2025	Self-Help Enterprises	Section VI.B.4. CONSTRUCTION For potential Expedited Drinking Water Grant (EDWG) projects receiving TA, we recommend that projects be identified earlier in the process and before a complete application for DWSRF funding is submitted. Since not all projects will qualify for EDWG funding, TA funding could then be prioritized to complete planning for those that do not qualify.	Comment noted. DFA staff will continue to work closely with applicants and TA providers during the planning process.	None.
34	Construction	7/30/2025	Self-Help Enterprises	Section VI.B.4. CONSTRUCTION We believe the increase from \$500,000 to \$1,000,000 as the limit for Urgent Drinking Water Needs (UDWN) will be very helpful for smaller construction projects.	Comment noted.	None.
35	Funding Eligibilities	7/30/2025	Self-Help Enterprises	Section VII.B. ELIGIBILITIES BY SOLUTION TYPE Regarding income parameters that are proposed, please clarify what entity will be conducting domestic well testing without income certification. Because services can only be offered to households based on income qualifications, further clarification should be provided on addressing ineligible households that receive free well testing. The second point has a statement that analyses from providers to show eligibility for all households may be considered, and SHE would like to request more information on the types of analyses that will be accepted. This second point also does not align to an earlier proposition that households served by PWS may be required to verify income to receive interim services (see Section VI.B.1, Interim Water Supplies).	Clarification added.	Section VII.B., p. 78.
36	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE We recommend adding a section for new enrollee low-income households where a local mitigation program exists but the household does not qualify.	Row added to Table 15. Under this scenario the State Water Board funding partners could provide services if the household meet eligibility criteria and there was funding remaining.	Section VII.B.1, Table 15, p. 82.



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37	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Regarding the statement that the State Water Board funding partners will refer an enrollee to a newly established mitigation program, please clarify what party will qualify a mitigation program as viable. If the funded party is responsible, a comprehensive list of qualifying criteria, including consideration for GSAs subject to probation, should be provided to all funded parties.	Comments noted. DFA staff will continue to work closely with funding partners on these topics and understand the need for flexibility during any transition period from a State Water Board-funded program to a local mitigation program.	None.
38	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Regarding the two-year window for services, we recommend the addition of a stipulation allowing extension where a long-term solution (LTS) is in progress, or where the LTS is delayed by factors outside of the enrollee's control.	Clarification made to Table 15.	Section VII.B.1, Table 15, p. 82.
39	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Under "Duration" for existing low-income enrollees, the language needs to be clarified and the "scheme" referenced should be written out as we are unable to identify the earlier scheme.	Clarification made to Table 15.	Section VII.B.1, Table 15, p. 82.
40	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE For "Continued Enrollment," please clarify if this scenario pertains to participants working towards a long-term solution or participants without a long-term solution available. Under Action, we note that current participants are not qualified on an annual basis for each service, so please provide clarity on whether this guidance is evolving, whether each service needs to be verified each year, and if the guidance will be uniform across participants served by DWs and SSWs. It is worth noting that previous income verification procedures were suspended because they were too burdensome and time-consuming.	Clarification made to Table 15,  Normally participants without a long-term solution should not be eligible based on specific program requirements.	Section VII.B.1, Table 15, p. 82.
41	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Under Transitioning Households off Interim Assistance, the bullet stating that a template transition letter be submitted for review contradicts recent guidance from DFA leadership given to SHE. Please clarify if the recent guidance will shift following approval of the FEP.	DFA staff will coordinate with SHE to clarify what is needed for their programs.	None.

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42	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Under Table 18, for households where a mitigation program is only able to cover a portion of the well cost, please clarify whether SWRCB-funded programs will be allowed to cover a total of \$60,000 regardless of the contribution of the external mitigation program or the remainder of the cost not to exceed \$60,000 per well.	Clarification made in Table 18.	Section VII.B.1, Table 18, pp. 89, 90.
43	Interim Assistance	7/30/2025	Self-Help Enterprises	Section VII.B.1. INTERIM AND EMERGENCY ASSISTANCE Under Table 18 for existing State Water Board-funded tank/hailed water programs, we recommend the following be added: Where no viable long-term solution is in place and there is no applicable GSA, the SWRCB tank and pump system are permanently installed and hauled water is provided for up to 12 consecutive months.	Clarification added to last row of Table 18.	Section VII.B.1, Table 18, pp. 89, 90.
44	Technical Assistance	7/30/2025	Self-Help Enterprises	Appendix J TECHNICAL ASSISTANCE: We appreciate the attention given to the critical role of technical assistance in helping disadvantaged communities and low-income households access the support offered by the SAFER program. The categorization of “planning assistance” vs. “capacity development” is useful, and we appreciate the acknowledgement that both types of assistance may be paired together.	Comment noted.	None.
45	Technical Assistance	7/30/2025	Self-Help Enterprises	Under “TA Work Plans,” the discussion of capacity correctly states that the “capacity of a TA provider is determined in coordination between the SWB and the TA Provider.” However, it is also implied that the Project Manager makes the final decision about available capacity. We have seen that this is not always a clear-cut calculation and believe the capacity determination should ultimately rest with the provider, as it is the provider who assumes the risk.	Work flow clarified in Appendix J.	Appendix J, Work Plans, p. 65.

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46	Technical Assistance	7/28/2025	Rural Community Assistance Corporation	RCAC recommends the State Water Board remove references to specific time frames when referencing technical assistance steps in the Draft FEP. While RCAC understands the intent to provide time frames, the Draft FEP does not explain how these time frames were established or why they are necessary. Each project is unique, and putting time frames in the FEP could create expectations for partner communities that their project will follow the same timeline. The time frames are not deeply integrated into the step criteria, which already provide a clear basis for project advancement. RCAC recommends removing the time frames but is open to continued dialogue on how to describe timing, influencing factors, and community engagement opportunities.	Timelines have been removed from the FEP. TA staff will communicate expected time frames for deliverables to providers based on the project type.	None.
47	SADW Fund Targets	7/28/2025	Rural Community Assistance Corporation	RCAC recommends the State Water Board remove or reword the comment on page 42 of the Draft FEP regarding non-profit TA provider capacity. The statement implies a fixed capacity, when in fact capacity is determined by funding decisions made during master agreement negotiations with the Division of Financial Assistance. If additional capacity is needed, agreements can be amended accordingly. The comment should more accurately reflect that TA provider capacity is tied to available funding.	Revision made.	Section V.B.1, p. 43
48	Interim Assistance	7/29/2025	Angie Moreno	The Proposed Fund Expenditure Plan Policy for Fy 2025-2026 would make water systems serving more than 1,000 people, such as Cutler PUD, ineligible for interim bottled water assistance. Adopting the policy means that people served by those water systems will not have access to the same public assistance as other families. The policy is a violation of California Human Right To Water Law. All Californians, regardless of where they live, have a right to safe drinking water. This means that all Californians, regardless of where they live, should have access to bottled water if their tap water is unsafe to drink. This bottled water should be provided until a permanent solution is in place, rather than the two-year limit proposed by the draft Fund Expenditure Plan. State Water Board need make sure the adopted Fund Expenditure Plan aligns with state law and does not leave any communities or households behind.	<p>Comment noted. Due to the limited availability of funding and the broad extent of public water systems facing water quality issues, we have further prioritized based on population with the intent to serve those most in need.</p> <p>For the Cutler community in particular, after a recent letter from the Central Valley Regional Water Quality Control Board, the Kings Water Alliance Management Zone will be assisting with interim water provision to the most vulnerable populations of the community. The State Water Board has approved co-funding to assist with these efforts. Additionally, language in the FEP will be clarified to allow for potential extensions of the two-year duration for interim service provision, especially in cases where a consolidation is being pursued.</p>	None.

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49	Domestic Wells & State Smalls	7/25/2025	San Joaquin Valley Water Collaborative Action Program	SWB has made some funding available for domestic well solutions, but there are not enough resources to address the statewide need for addressing domestic well failures, including consolidation or regionalization projects. SWB should identify and appropriate the necessary funding to implement a locally driven domestic well mitigation or consolidation program. Prioritize funding for outreach, engagement, and technical assistance to ensure projects can be designed and developed.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.
50	Construction - Consolidation	7/29/2025	Kristin Dobbin-University of California Berkeley	Suggests that for the purposes of funding eligibility and prioritization, the Board defines consolidation based on specific, desired outcomes, rather than the mechanism itself (i.e. joining of two or more systems).	Comment noted. DFA staff will consider for inclusion in future FEPs (and DWSRF IUP, as appropriate).	None.
51	Interim Assistance	7/29/2025	Kristin Dobbin-University of California Berkeley	For PWS and domestic wells and SSWS, the board should remove the proposed two-year duration for bottled water services. This time limit is completely out of alignment with the water board's own realized project timelines and even SAFER goals related to implementing long-term solutions. Similarly, urges the Board to eliminate plans to provide only some residents in each community with bottled water, as determined by household income verification. The FEP should also allocate more funding to long-term solutions for these domestic well residents including domestic well repair and replacement.	The language has been clarified in the Draft Final FEP to include flexibility around amendments, especially in cases where a consolidation is being pursued. Providing services based on a DAC or low-income status is a requirement of the funding source and also in alignment with the SAFER Program goals and priorities of focusing on solutions for small DACs and low-income households.	Sections VI.B.1 and VII.B.1.
52	Interim Assistance	7/29/2025	Kristin Dobbin-University of California Berkeley	Strongly urges for the 1,000 population limit provision of interim water supplies to be removed from the Draft FEP. There are other possible solutions. For example, the Board could require systems meeting this size threshold to provide bottled water as part of their compliance order in lieu of financial penalties.	Comment noted. Due to the limited availability of funding and the broad extent of public water systems facing water quality issues, we have further prioritized based on population with the intent to serve those most in need.	None.

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No.	Comment Topic	Date of Comment	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to FEP - Section and pg. #
52	Advisory Group	7/29/2025	Kristin Dobbin-University of California Berkeley	Strongly recommends that the proposed content for the draft FEP is addressed in at least one AG meeting, prior to the publication of a formal draft for public review, preferably two. Doing so would take seriously the role of the AG to help guide the SAFER program and more clearly demonstrate the board's commitment to participation and consultation in this process.	Comment noted. State Water Board staff continue to value the input of the SAFER Advisory Group. DFA staff will continue to work with OPEETA and the SAFER Advisory Group (AG) to determine the most appropriate content and timing for bringing FEP topics to the AG, given the broad range of topics covered during each AG meeting; the limited number of AG meetings; and the constrained timeframe for drafting and finalizing the FEP.	None.
53	Planning and TA	7/29/2025	Kristin Dobbin-University of California Berkeley	Throughout the document, planning via TA is grouped with TA.	Comment noted and a further separation of planning via TA versus TA for capacity development will be considered for future FEPs.	None.
54	Administrators	7/29/2025	Kristin Dobbin-University of California Berkeley	Board should prioritize water systems with administrators and those under receivership to receive funding to advance their long-term solutions to restore local public governance to these systems as soon as possible.	Comment noted. Systems that are appointed administrators and those under receivership generally meet criteria to be Failing or At-Risk. As such, these systems are included in the SAFER funding priorities listed in Section V.A.	None.
55	Metrics	7/29/2025	Kristin Dobbin-University of California Berkeley	The "number of systems off the failing list" metric needs to be defined and its relation to the "percent of systems that have failed again since 2019" metric needs to be clarified. Is this number inclusive of these systems? Rework the metric to focus on the number of failing systems that have implemented a sustainable solution addressing their original reason for failing.	Some clarifying footnotes have been added to the table and corrections to the metrics have been made. The State Water Board does track which Failing systems have come back into compliance with State Water Board funding. DFA staff can connect with the commenter to further explore alternative methods for tracking progress in addressing Failing systems.	Appendix C
56	Metrics	7/29/2025	Kristin Dobbin-University of California Berkeley	The "active consolidation project metric" should be defined and validated. Given that consolidations are the Board's top priority solution, tracking these systems through the consolidation process, and understanding where delays occur, is an important opportunity to learn and improve.	Line in table revised to be "Number of Consolidation Projects in Progress as of 6/30/2025" for clarity.	Appendix C
57	Metrics	7/29/2025	Kristin Dobbin-University of California Berkeley	The presentation of Table C-5 "Administrator metrics" alongside the consolidation metrics table disconcertingly positions administrators as a solution rather than a regulatory tool. I suggest these metrics be moved elsewhere to avoid this 5 impression or additional text as to the intent behind these metrics and their presentation be added.	The subsection and Metric Category 4 (per the SADW Fund Policy) was renamed as "Failing Systems, Systems That Have Returned to Compliance, and Other Regulatory Measures and Tools". Some additional context added ahead of the table.	Appendix C



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58	Interim Assistance	7/29/2025	Kristin Dobbin-University of California Berkeley	Table 6 does not indicate which programs may assist PWSs as stated on page 49. Suggest adding this information to the table or removing this text.	Table 6 only shows regional programs that can assist PWSs. Most regional programs are more focused on providing services to the DW/SSWS communities, and these are shown in Table 14.	Section VI.B.1 - added reference to Table 14 for more information on regional programs that can assist DW/SSWS communities.
59	Metrics	7/29/2025	Kristin Dobbin-University of California Berkeley	Table C-11 purports to speak to the effectiveness of board engagement efforts but only presents information about quantity of meetings etc. rather than outcomes or quality. Suggest changing the descriptive text to make this clear.	Text introducing the table was revised to refer to the amount of community engagement rather than its effectiveness.	Appendix C
60	Domestic Wells & State Smalls	7/25/2025	San Joaquin Valley Water Collaborative Action Program	SWB should provide reasonable authority to the appropriate local or regional agency/entity to implement the domestic well mitigation or consolidation program. SWB should provide support to adequately staff these agencies as they implement programs.	See response to comment 49.	None.
61	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	A Small Water System Authority model would enable smaller water systems to be physically or managerially consolidated with other small water systems under the Authority's umbrella. Explore the feasibility of establishing and/or provide guidance on how to establish the legal framework for a Small Water System Authority. Use existing examples, such as Placer County Water Agency, to inform how these entities ay be structured. Evaluate the Administrator Program and supporting legislation and implement regulatory and procedural changes to fully exercise the authority of the Administrator when possible.	<p>Placer County Water Agency has been a great partner and shown what strong local leadership can accomplish with a regional consolidation project. However, they don't have any unique consolidation authority but rather put their own resources towards consolidation efforts.</p> <p>DFA staff will work with the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.</p>	None.
62	Process Improvements	7/25/2025	San Joaquin Valley Water Collaborative Action Program	We believe the funding resources are overly restrictive and lack flexibility, nimbleness, and focus. SWB should: evaluate results from the 2022 State Auditor Audit to determine progress, establish a collaborative working group including project proponents to find efficiencies in the process, review the results of the CA Clean Water State Revolving Fund "Review of the Load Award and Disbursement Process" to identify any additional improvement, and identify alternative pathways by which small water systems can demonstrate financial and legal fitness as part of an application .	See response to comment 49.	None.

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No.	Comment Topic	Date of Comment	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to FEP - Section and pg. #
63	Emerging Contaminants	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Regarding emerging contaminants such as manganese, PFAS, and 1,2,3-TCP: encourage further discussion on how these systems will be notified of their new eligibility for funding, and if outreach and technical support will be provided. Suggests using alternative models like the DWR Small Supplier Water Conservation Assistance Program.	DFA staff will coordinate with its funding partners and DDW to notify communities of available resources to address emerging contaminants. DFA staff will reach out to the California Association of Mutual Water Companies and Community Water Systems Alliance to continue this discussion.	None.
64	Metrics	7/31/2025	Solano County	<p>Improve Performance Tracking and Outcome Transparency (Figure 10, pg. 23) The FEP should disaggregate outcomes by geography and system type. Key indicators to report include:</p> <ul style="list-style-type: none"> <li>• Number of DWs or SWSs addressed (e.g., well replacements, POU/POE)</li> <li>• Households served by county</li> <li>• Projects completed vs. initiated</li> </ul> <p>This would improve transparency and support tracking of equity-focused outcomes.</p>	Comment noted. DFA staff will consider incorporating these types of metrics into our data tracking.	None.
65	SADW Fund Targets	7/31/2025	Solano County	<p>Clarify Funding Methodology for Target Allocations (Table 4, pg. 40) Table 4 presents FY 2025–26 target allocations by system and solution type, but the rationale and method are unclear. We recommend including a concise explanation—summarizing how needs assessments, stakeholder input, and projected demand informed these percentages. While the details are in Appendices C and G, a summary in the main text would improve accessibility.</p>	Comment noted. The SADW Fund targets were largely based on an extensive evaluation of program demand for the various solution types along with anticipated available funding and the funding limitations of the other complementary SAFER funding sources. SADW Fund targets included the demand over three FYs for interim assistance and technical assistance, and included one FY of demand for the other solution types. Since there are other funding sources available for construction for PWSs, less funding from the SADW Fund was targeted for that, but the SADW Fund target accounts for anticipated construction demand for DW/SSWS in the coming FY.	None.
66	Interim Assistance	7/31/2025	Solano County	<p>Introduce Flexibility in Interim Funding Terms (Tables 4, 15 &amp; 18; pgs. 40, 78 &amp; 84)While the two-year term supports long-term outcomes, it may not accommodate delays due to permitting, environmental review, or construction. We recommend:</p> <ul style="list-style-type: none"> <li>• Retaining the two-year baseline term, but allowing extensions based on demonstrated progress and need, subject to available funds.</li> <li>• Providing guidance on extension eligibility to ensure consistency and fairness across applicants.</li> </ul>	Clarifications made to Tables 7, 15, and 18.	Sections VI.B.1 and VII.B.1.

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67	Technical Assistance	7/31/2025	Solano County	<p>Broaden Planning and Technical Assistance Eligibility for Non-DAC Households (Table 16, pg. 80)</p> <p>Current eligibility is limited to DACs and severely DACs, but non-DAC households may also face risks and lack early intervention resources. We recommend allowing cost-share options for non-DAC households to support proactive planning and reduce long-term burdens on the SAFER Program.</p>	<p>The limitation of technical assistance funding to DACs and for the benefit of low-income households is a result of requirements of the SADW Fund. Technical assistance may be provided to non-DACs, but would need to have a nexus to greenhouse gas reduction.</p>	None.
68	Domestic Wells & State Smalls	7/31/2025	Solano County	<p>Provide Clearer Access Guidance for Private Well Owners (Section VII, pgs. 74–86)</p> <p>The FEP lacks clarity on how private well owners can seek assistance. A simple flowchart should outline:</p> <ul style="list-style-type: none"> <li>• Eligibility criteria</li> <li>• Regional or program points of contact</li> <li>• Steps to submit and review requests</li> </ul> <p>This would increase participation and lower access barriers for well owners.</p>	<p>This information can be found on the State Water Board's website at: <a href="https://waterboards.ca.gov/water_issues/programs/grants_loans/drinking_water_well.html">https://waterboards.ca.gov/water_issues/programs/grants_loans/drinking_water_well.html</a>.</p> <p>Also: <a href="https://waterboards.ca.gov/water_issues/programs/grants_loans/sustainable_water_solutions/docs/2023/safer-programs.pdf">https://waterboards.ca.gov/water_issues/programs/grants_loans/sustainable_water_solutions/docs/2023/safer-programs.pdf</a></p>	None.
69	Funding Eligibilities	7/31/2025	Solano County	<p>Clarify Treatment of At-Risk Systems Outside Priority Zones (Table 2, pg. 14)</p> <p>Table 2 shows 34–51% of SWSs and DWs are potentially at risk, but the FEP doesn't clarify their eligibility for funding outside priority zones. We recommend clarifying:</p> <ul style="list-style-type: none"> <li>• Whether these systems qualify for TA, interim, or planning funds</li> <li>• How geographic and income-related risks are factored into funding decisions</li> </ul>	<p>Table 2 presents information on the number of At-Risk, Potentially At-Risk, and Not At-Risk Domestic Wells and State Small Water Systems were identified in the 2025 Needs Assessment. DW/SSWSs are eligible for interim, TA, and long-term solutions as defined in Section VII.B. These funding eligibilities are currently independent of risk status.</p>	None.
70	SB 552	7/31/2025	Solano County	<p>Support Integration with County SB 552 Planning (pgs. 72–73)</p> <p>We support the FEP's local collaboration emphasis and recommend further aligning with SB 552 by:</p> <ul style="list-style-type: none"> <li>• Prioritizing county-led Drought Resilience Plans</li> <li>• Allowing flexible funding for regional assessments and planning</li> <li>• Supporting projects that link local planning with long-term solutions (e.g., maintenance, consolidation, regional efforts)</li> </ul>	<p>As noted in Section VI.D, SB 552 related funding requests (including examples listed in the comment) can be considered on a case-by-case basis with respect to other funding priorities of the SAFER Program and availability of funds.</p>	None.
71	Domestic Wells & State Smalls	7/31/2025	California Water Association	<p>We support including domestic wells and state small water systems in the FEP but urge the State Water Board to ensure efficient use of funds by implementing controls.</p> <p>We recommend:</p> <ul style="list-style-type: none"> <li>• Prioritizing funding based on public health urgency and potential impact,</li> <li>• Balancing investments to maximize residents served, and</li> <li>• Ensuring transparency and long-term benefits.</li> </ul>	<p>Comment noted. DFA staff will be working towards further developing this initial DW/SSWS strategy based on stakeholder input and discussions with updates to be provided in future FEPs.</p>	None.

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72	Construction - Consolidation	7/31/2025	California Water Association	<p>Adopt Policy to Prevent Disincentives for Timely Consolidation Improvements</p> <p>CWA recommends the State Water Board base grant eligibility on the condition of a system at the time of acquisition, not application. Current rules can discourage prompt improvements, as systems may lose eligibility after consolidation. This policy change would remove that disincentive and support timely action aligned with SAFER goals.</p>	DFA staff will work with CWA to further consider this comment.	None.
73	Funding Priorities	7/31/2025	Community Water Center	<p>We Recommend the Board Better Consider Equity and Environmental Justice When Implementing the SAFER Program: We recommend the Board review both the IUP and FEP with a stronger equity lens (i.e., prioritizing underserved communities without access to safe water infrastructure, notwithstanding of potential higher project costs and/or longer project timelines) and consider the impacts changes may have on systems and communities facing the most barriers and whether changes will exclude those communities from receiving the assistance they need. We recommend that the FEP be revised to prioritize those communities facing the most intransigent barriers to safe drinking water.</p>	<p>Comment noted. DFA staff continue to consider ways to improve data presentation around racial equity and environmental justice metrics for committed projects, as well as PWSs on the Failing list and those included in the Needs Assessment. Although there are not targets associated with the demographic data presented in the FEP, the data indicate that the Board's funding criteria and priorities have resulted in funding going to communities that are the most economically disadvantaged; have the highest poverty rates; and bear the highest pollution burdens. DFA staff can coordinate a meeting with entities that authored this comment letter to further discuss their ideas.</p>	None.
74	Interim Assistance	7/31/2025	Community Water Center	<p>A. We Recommend the Board Remove Time Limits on Interim Solutions and Facilitate Improved Coordination Between Interim and Long-Term Solutions:</p> <p>We urge the Board not to impose a 2-year cap on interim solutions, as long-term projects often take much longer. Interim measures like bottled water and POU/POE devices are essential for public health and maintaining community trust during this time. Instead of time limits, the Board should improve coordination between interim and long-term efforts and streamline processes to deliver permanent solutions faster.</p>	Clarifications made to Tables 7, 15, and 18.	Sections VI.B.1 and VII.B.1.
75	SAFER Goals & Strategy	7/31/2025	Community Water Center	<p>B. We Recommend the Board Employ Stronger Enforcement on Responsible Parties and Pilot Integrating Responsible Party programs into SAFER:</p> <p>The Board must prioritize stronger enforcement mechanisms for responsible parties who are delaying or avoiding their obligation to provide safe water.. Integrating programs like the Central Coast's Alternative Water Supply (AWS) into the SAFER program would improve coordination, efficiency, and oversight. We recommend the Board administer the AWS program through the SAFER program.</p>	Comment noted.	None.

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No.	Comment Topic	Date of Comment	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to FEP - Section and pg. #
76	Interim Assistance - GSAs & Mitigation Programs	7/31/2025	Community Water Center	C. We Recommend Improved Coordination with Local Mitigation Programs: We recommend active coordination between responsible parties and the SAFER program to ensure mitigation is being properly implemented. Where there is no local TA provider supporting domestic wells, we recommend the Board coordinate with the Department of Water Resources and the local GSAs and MZs to ensure domestic wells and SSWS are being properly supported.	As the DW/SSWS strategy continues to be implemented, Water Board staff expect to continue coordination discussions with local mitigation program contacts and funding partners and/or TA providers.	None.
77	POU/POE Pilot	7/31/2025	Community Water Center	D. We Encourage the Board to Pilot a Comprehensive Point of Use and Point of Entry Project: We encourage the Board to invest in a comprehensive pilot program for regional Point-of-Use (POU) and Point-of-Entry (POE) treatment, involving local entities like counties or special districts. This pilot should evaluate regional strategies, implement selected approaches, and establish standards for operation, maintenance, and monitoring. The findings will help set minimum requirements for responsible parties funding decentralized treatment where centralized solutions aren't feasible.	A POU/POE Pilot is currently in progress, with more information included in Appendix E of the FY 2025-26 FEP. DFA and DDW staff can coordinate a meeting with entities that authored this comment letter to further discuss their ideas.	None.
78	SAFER Goals & Strategy	7/31/2025	Community Water Center	E. We Recommend the Board Promote Equity by Fostering a Funding Environment in which NGOs are Able to Grow and Plan Sustainably: We recommend that the Board continue to improve, track and report on its TA funding procedures to avoid delays in the review and execution of work plans, funding agreements, and amendments so that all TA providers are able to advance critical projects in a timely manner without having to work at risk while awaiting funding commitments.	See response to comment 46.	None.
79	Technical Assistance	7/31/2025	Community Water Center	We recommend the Board Increase the Allocation for Technical Assistance to Domestic Well and SSWS Communities: We recommend the Board increase TA for domestic well and SSWS communities to ensure these communities are considered equitably and to reduce their need to remain reliant on costly interim solutions. We recognize that the SAFER program has finite resources and recommend the Board deprioritize water systems that are non-DACs from receiving TA and leverage the Emerging Contaminant fund to augment TA efforts for domestic wells and SSWS.	The SADW Fund targets are based on a robust demand projection exercise and the particular targets for interim assistance and technical assistance go out three fiscal years. The Board still has discretion to approve additional projects in the event the actual demand for TA for DW/SSWS communities exceeds the targets.	None.



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No.	Comment Topic	Date of Comment	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to FEP - Section and pg. #
80	Technical Assistance	7/31/2025	Community Water Center	We recommend the Board delay finalizing the Technical Assistance (TA) milestones and decision criteria until more input is gathered from TA providers to ensure the framework supports, rather than hinders, communities in need. The framework should be flexible, account for Board process delays, and promote efficiency by allowing critical tasks to start early and run concurrently. It should also emphasize ongoing community outreach and engagement as essential to project success.	See response to comment 46.	None.
81	SAFER Goals & Strategy	7/31/2025	Community Water Center	The Board Should Additionally Prioritize Solutions For Systems In Receivership Or With An Administrator: We support prioritizing failing and at-risk systems serving disadvantaged communities and low-income households using domestic wells and small water systems. We also recommend revising the Draft FEP to prioritize systems in receivership or with assigned administrators, ensuring funding focuses on restoring these systems to public governance after severe water or management issues.	See response to comment 54.	None.
82	Process Improvements	7/25/2025	San Joaquin Valley Water Collaborative Action Program	Analyze past completed projects and develop a standardized (but not prescriptive) approach. Work with institutions such as UC Berkeley to develop and adopt a consolidation/regionalization/partnership toolbox.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.
83	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	Eliminate the maximum grant allowed per service connection, and/or develop an alternative funding mechanism that accommodates the significant investment required to establish infrastructure in projects that extend public water service to private well communities. Encourage the SWB to exercise its authority to appoint Administrators for early intervention.	The maximum grant eligibility for projects benefitting 200 residential connections or less do not include a per connection cap. The DWSRF IUP indicates that DFA's Deputy Director can approve up to \$120,000 per connection for projects benefitting more than 200 residential connections and addressing compliance with a mandatory consolidation order or addressing a system with an appointed Administrator or a system in receivership.	None.
84	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	New water systems are still created for developments that could be served by an existing municipal or larger water system. Change state law (or local regulations) to require any new water system/development to be served by an existing water system that can feasibly serve the new water system/development.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.
85	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	To advance consolidation projects.....adopt and promote One Water principles across programs, create public information campaign that emphasizes the shared nature of our water resources, and enhance support for multi-benefit and collaborative projects.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.

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86	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	Community members need more information to understand the potential effects of consolidation, both positive and negative. Identify what encourages and discourages communities to consolidate - develop best management practices to inform how to design successful community-driven long-term drinking water solution. Use storytelling to highlight consolidation success stories.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.
87	Construction - Consolidation	7/25/2025	San Joaquin Valley Water Collaborative Action Program	Invite program leaders from states like Kentucky, Ohio, and New Mexico to share their stories and lend expertise to California's quest to fulfill the Human Right to Water.	DFA staff will reach out to the San Joaquin Valley Water Collaborative Action Program to continue discussion around comments included in their letter related to both the FEP and DWSRF IUP.	None.
88	Domestic Wells & State Smalls	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Urge more explicit inclusion of small system challenges in strategies designed for domestic wells and state small water systems, particularly when they appear disproportionately on enforcement lists and hope that future efforts continue to consider wider toolkit of sustainable options.	Comment noted. These challenges are highlighted in the annual Drinking Water Needs Assessment.	None.
89	Projected Funding Demand	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Request to provide better explanation of the projected 75 percent drop in demand over two years.	This projected demand estimate is based on known projects in the State Water Board's pipeline. Based on the results of the prior Needs Assessment, we do expect that more projects will be requesting State Water Board funding for TA/planning and construction. As more data becomes available through technical assistance and planning, these numbers will be adjusted in the future.	None.
90	Projected Funding Demand	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Urge SWB programs and divisions to collaborate on a more thorough analysis of future SAFER grant/PF funding needs, and to explain the assumptions behind the three-year projections.	Comment noted.	None.
91	Process Improvements	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Encourage the State Water Board to continue assessing opportunities to streamline coordination across funding sources and funding partners to reduce potential redundancies such as the requirement to complete a consolidation study as a first step.	Appendix G includes a table which describes improvement made since FY 2019-20 relative to the funding process phases to streamline internal processes and coordination. To date, there have been about 80 process improvements implemented with another 17 being developed.	None.
92	Interim Assistance	7/31/2025	California Association of Mutual Water Companies and	Concern with the limits on interim assistance. Request to clarify how the availability and duration of interim assistance is tied to their identified long-term solutions.	Clarification made to Table 15.	Section VII.B.1, Table 15, p. 82.

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			Community Water Systems Alliance			
93	EDWG	7/31/2025	California Association of Mutual Water Companies and Community Water Systems Alliance	Provide clarification why EDWG is limited to publicly owned community systems and CPUC regulated utilities, and does not extend to mutual water companies and whether eligibility can be broadened.	DFA is currently updating the EDWG guidelines and application forms, and one of the updates is the consideration of mutual water companies as eligible applicants.	None. There are updates being made to the DWSRF IUP.