

Department of Water Resources (DWR)
 State Water Resources Control Board Summary of and Responses to the
 DWR 2020 EAR Comment Letter dated September 17, 2020

DWR Comments (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
Provide auto calculation of Production, Delivery and Residential GPCD for current and two prior years to verify appropriate units and population.	Agree but not able to implement	TBD	Error validation criteria will be developed for implementation in future years.
Section 3 (Service Connections). Add back "Other" water user class, which was removed in 2019 EAR. This water user class is used by DWR in CA Water Plan Update.	No	NA	DDW does not have an option to track 'Other' in SDWIS and is therefore becomes information DDW cannot track if retained for PWS reporting. Perhaps DDW could assist in how to revise the CA Water Plan evaluation based on available data.
Auto-populate "Water Sold to Others" from Production to Delivery table, as they should be the same numbers.	No	NA	The Water Board disagrees that the two data points are the same in all cases. Water Sold to Others is not equal to Water Produced for partial wholesalers. Applying this logic would require qualifying percent sold.
Provide guidance to PWSs on how to populate Water Delivered table based on the types of water identified in Water Produced table	Agree	TBD	The Water Board will continue to improve guidance provided to water systems on how to appropriately report water produced and water delivered.
Recycled water should be included in Water Delivered table, with clear instructions.	Yes	2020 EAR	Recycled water deliveries are already incorporated in the Water Delivered table as a percent of each of the delivery categories.
Avoid changing or combining population and water connection reporting types to allow comparisons of data over time.	No	NA	The Board has been taking steps to synchronize the data collected in the EAR with the data types managed in SDWIS as much as possible. This has resulted in changes to population and service connection categories over time but is necessary to ensure the collection of data that is able to be tracked adequately in our SDWIS database.