

**Joint Comments from Community Water Center, Leadership Counsel for Justice & Accountability, California Coastkeeper Alliance, Natural Resources Defense Council, Pacific Institute, and Clean Water Action**

State Water Resources Control Board Summary of and Responses to the  
Joint 2020 EAR Comment Letter dated September 9, 2020

Joint Comments (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
Under Health & Safety Code section 116530, make all sections mandatory	Agree but not able to implement	NA	Although the Water Board agrees that all of the questions asked have value and warrant being reported, the complexity of establishing all sections and questions to be mandatory may cause increased failure to submit an EAR. The current effort to improve the reporting experience by skipping sections and questions that do not pertain wo a specific water should result in an overall improvement in data reporting and data quality.
Identify ways to support SWSs to complete EAR, such as including a TA needed check-box in EAR.	Agree	2020 EAR	The Board is developing a proposal to include a banner on top of the EAR pages providing information to water systems to seek technical assistance from RCAC, CRWA or SHE via the DFA Assistance Request Form for completing the EAR.
Likely errors and missing data should be flagged when the respondent is inputting data	Yes	2020 EAR	Error validation and flagging missing data while reporter is on the page are new features to be implemented in future years of the EAR.
Board staff should verify information once it is received; and respondents should be asked to correct mistakes.	Yes	2020 EAR	The review process by Water Board and LPA staff currently does include the function to return an EAR indicating mistakes to be corrected.
Allow null, NA, Unknown, 0 or No responses.	Conditionally agree	2020 EAR	Where appropriate, the Water Board will allow water systems to respond to survey questions with either a "Not Applicable" or "Data not collected." However, the Water Board expects and requires water systems to track and gather data associated with mandatory survey questions. For some survey questions, the Water Board may allow a water system to indicate that data is not collected, but the expectation is that the water system will begin collecting this data and will only be granted a limited grace period for reporting.

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Ensure terms and definitions are consistent across Water Board EAR & Water loss reports and DWR.	Agree	TBD	The Water Board, as well as other entities, recognize the importance of having a common set of definitions across all reported water datasets. There are ongoing discussions on this topic, but it will take time to implement.
Question C1.3 - provide ranges/bins for shutoff duration	Yes	2020 EAR	The Water Board may consider changing this question to bins in future iterations.
Water shutoff - clarify whether any portion of a day counts as a full day	Yes	2020 EAR	The Water Board can provide clarity on the definition for the user.
Collect additional shutoff data to inform on new resources needed to help SWS/LWS in COVID recovery.	Yes	2020 EAR	Will implement proposal to develop bins for reporting number of shutoffs.
Collect data on the factors and criteria used to inform tiered water rate structures.	No	NA	Unsure if this data exists or how it would be used
Water Board should implement DWR CDAG recommendations regarding SWS drought planning needs in the 2020 EAR.	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
List of 8 specific questions related to drought preparedness recommended for 2020 EAR:	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Do you have an inventory and assessment of water supply and demand, including average and peak demand?	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.

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Identify source (e.g., groundwater/surface water/purchased water), location, historic yield, current yield (gpd)	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
How will you determine if a water shortage is imminent?	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Description of what indicates drought conditions for your system.	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Have you identified alternative water sources in the case of drought and water shortage?	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Describe action for reduction or loss of water in the well.	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Identify intertie to adjacent water supply systems within ¼ mile and feasibility of connecting.	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.

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Describe contingency measures for incremental interruptions due to longer term events such as drought or acute loss of one source.	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.
Is your Emergency Response Plan updated with a plan of action for a drought emergency?	Agree	2021 EAR	Water Board will be working internally and with DWR to identify which platform (EAR Vs. ENP) and the types of information to be gathered via each platform to ensure appropriate planning is conducted by SWSs as well as the necessary data is obtained to inform the Water Board on statewide readiness and resiliency.