
State Water Resources Control Board

STATE WATER RESOURCE CONTROL BOARD DRINKING WATER CAPACITY DEVELOPMENT STRATEGY

DISCUSSION

Small and/or disadvantaged communities face specific challenges related to their drinking water systems. Such communities lack the capital and economies of scale to maintain their system, to conduct necessary compliance monitoring, or to implement projects that correct violations of drinking water standards. They also often have difficulty obtaining and retaining not only qualified operators, but managers, board members and administrative staff.

The State Water Resources Control Board (State Water Board) makes extensive efforts to support water systems through capacity development. However, the State Water Board also recognizes that the significant responsibility and costs to operate a public water system are often overwhelming for small water systems with poor economies of scale, particularly in financially disadvantaged communities. As a result, the State Water Board highly encourages voluntary consolidation whenever feasible.

Consolidation is the joining of two or more water systems, which includes, usually but not always, a smaller system being absorbed into a larger water system. Consolidation can be either physical or managerial. Benefits of consolidation include cost sharing for billing and operational personnel, new/replacement infrastructure, and systems often can purchase time-saving equipment that neither system could afford to purchase alone because they can spread costs over a larger customer base. Small public water systems are often less resilient to natural disasters, such as drought and fire, have more difficulty adjusting to regulatory changes, and may struggle to fund infrastructure maintenance and replacement due to poor economies of scale and lack of expertise. For these reasons, the State Water Board has been working diligently to encourage voluntary consolidation in addition to supporting capacity development.

This document is the State Water Board's small and/or disadvantaged community strategy for drinking water capacity development for the next three fiscal years, a time period that coincides with the federally required triennial capacity development report to the governor.

DRINKING WATER CAPACITY DEVELOPMENT STRATEGY

The U.S. Environmental Protection Agency (EPA) has delegated State primacy to the State Water Board for enforcement of the provisions of the federal Safe Drinking Water Act (SDWA), which requires the State to develop a strategy and address the five elements identified in the table below ([Handbook for Capacity Development, pg. 55](#)). Within the State Water Board, the Division of Drinking Water (DDW) oversees enforcement of drinking water standards and requirements of

Public Water Systems in California under the SDWA.

SDWA Elements
1 – Methods or Criteria to Prioritize Water Systems
2 – Factors that Encourage or Impair Capacity Development
3 – How the State will use the Authority and Resources of the SDWA
4 – How the State will Establish the Baseline and Measure Improvements
5 – Procedures to Identify Interested Persons

California’s Capacity Development Program strategy is comprised of 10 strategic goals and associated SDWA elements. The following table summarizes the goals and associated elements:

Drinking Water Capacity Development Strategic Plan Goals for Fiscal Years 2019 - 2022		
Goal	SDWA Element(s)	Goal Deadline
Offer More Extensive Training to Drinking Water Program Staff		3 rd Quarter 2019
Form a Capacity Development Coordination Team	3	3 rd Quarter 2019
Create a Survey about the Technical Assistance (TA) Provider’s Performance	2	1 st Quarter 2020
Update and Maintain the Division of Drinking Water’s Capacity Development Website		Beginning 2 nd Quarter 2020
Re-evaluate and Update Technical, Managerial, and Financial (TMF) Criteria and Assessment Forms	2	2 nd Quarter 2020
In Collaboration with DFA, Develop a Tracking System of TA Requests and TA Provided	1	2 nd Quarter 2020
Present Options to Digitize TMF Assessment Data from Different Sources		4 th Quarter 2020
Follow Up on Newly Permitted Water Systems	2	1 st Quarter 2021
Digitize TMF Data from Different Sources and Develop a Centralized Database to Store the TMF Assessment Data	2	2 nd Quarter 2021
Establish Capacity Development Performance Measures	4	2 nd Quarter 2021
Continue to Collaborate with National Stakeholders	5	Ongoing

Strategic Goal 1 – Offer More Extensive Training to Drinking Water Program Staff

It has been identified that DDW and Local Primacy Agency staff need more extensive training in the managerial and financial aspects of TMF. Training would be incorporated into the Division’s sanitary survey training module which will address additional elements to be reviewed during a sanitary survey.

Strategic Goal 2 – Form a Capacity Development Coordination Team (Team)

In order to have an efficient capacity development program, a higher level of collaboration between State Water Board divisions and outside agencies is needed. The Division of Drinking Water’s (DDW) coordination team will include members of DDW-Program Management Branch,

Division of Drinking Water-Field Operations Branch (DDW-FOB), Division of Financial Assistance-Technical Assistance, Division of Financial Assistance-Operator Certification, and the Local Primacy Agencies. The team will collaborate regularly to discuss factors that either encourage or impair capacity development and methods of achieving performance goals. This may include planning necessary trainings, reevaluating certified operator requirements, creating criteria to identify and prioritize TA of water systems in need of improving TMF capacity, and establishing the best use of TA revenues and resources of the SDWA to achieve performance goals.

Strategic Goal 3 – Create a Survey about TA Providers’ Performance

There is a lack of knowledge regarding how the contracted TA providers are performing. Water system and DDW-FOB feedback about TA services provided will allow the Team to identify which activities encourage capacity development the most, so that suggestions can be made to the TA providers on where to improve their services, marketing and/or activities.

Strategic Goal 4 – Update and Maintain DDW’s Capacity Development Website

DDW’s Capacity Development website will be updated and maintained so that the public and regulators have up to date information and are not misguided.

Strategic Goal 5 – Re-evaluate and Update TMF Criteria and Assessment Forms

TMF criteria that is used when permitting new systems, changing water system ownership, or approving funding will be re-evaluated and updated to ensure that water systems have long term sustainability. Assessment forms to be used by water systems and regulatory staff will be updated accordingly and posted on the DDW Capacity Development website.

Strategic Goal 6 – In Collaboration with DFA, Develop a Tracking System for Technical Assistance Requests and TA Provided

DDW has identified a need to for a prioritization schema for TA for water systems that are entering a funding program or are currently in a funding program. This schema will assist regulators and TA providers in providing services in an efficient and effective manner. DDW will meet with the TA providers and DFA regularly to discuss project prioritization. Items used to prioritize water systems would include assessment of Level 1/ Level 2 Revised Total Coliform Rule, Maximum Contaminant Level violations of state and federal primary drinking water standards, monitoring and/or reporting violations, financial triggers, poor certified water operator retention, etc.

Strategic Goal 7 – Follow Up on Newly Permitted Water Systems

DDW will review all water systems that were newly formed and permitted in Fiscal Year 2016-2017 and every fiscal year thereafter to ensure they have all TMF elements that promote long-term sustainability. Each water system will be reviewed at four (4) and six (6) years after permit issuance to determine if any failures are consistently occurring and whether those failures could be prevented in the future with better permitting procedures. This will help identify which TMF elements are often overlooked and will identify any need for policy or regulatory change.

Strategic Goal 8 – Digitize TMF Data from Different Sources and Develop a Centralized Database to Store the TMF Assessment Data

DDW will evaluate ways to digitize TMF data, which is crucial for assessing a water system’s capacity. Data will be gathered from sources such as sanitary surveys, the electronic annual

report, TA provider's TMF assessment data, the TMF Tune-Up (to be completed by 12/31/2020), the State Water Board's Needs Assessment, and data shared by other agencies. A centralized database will be developed to store the data, which would be used to create reports that help identify water systems that could become unsustainable in the future or help identify good candidates for water partnerships or consolidations. Data would also help visualize and measure improvements in the capacity of water systems over time.

Strategic Goal 9 – Establish Capacity Development Performance Measures

DDW does not yet have a method for assessing the capacity of water systems based off TMF information. Data stored in the newly created TMF database (see strategic goal 2) would be evaluated and then used to create metrics that measure overall water system performance. Establishing baseline measures would help regulators and TA providers better create and meet goals that promote sustainable water systems. Elements used to create the performance measures would include information about financial reserves, water service rates, water operator retention, water loss calculations, number of main breaks, number of pipe replacements, emergency response plans, etc.

Strategic Goal 10 – Continue to Collaborate with National Stakeholders

Stakeholders provide valuable insight and suggestions which DDW can improve greatly from. The capacity development team will continue to collaborate and interact with external stakeholders in a more consistent manner, involving them in the implementation of the capacity development strategy. Activities will include attending the national EPA workshop and meeting with TA providers, funding agencies, and other interested parties.