

**Expedited Drinking Water Grant Funding Guidelines Revisions**  
**Response to Comments Received December 19, 2025**

No.	Comment Topic	Commenter(s)	Summary of Comments	SWRCB Staff Response to Comments	Edits to EDWG GLs - Section and pg #
1	Funding Eligibility	California Association of Mutual Water Companies	<b>Support for Expanded Eligibility:</b> CalMutuals strongly supports the inclusion of communities served by mutual water companies as eligible for EDWG funding. This change acknowledged the important role of small water systems in providing essential drinking water services across the state. The expanded eligibility helps address historical barriers and promotes equitable access to resources for small systems with urgent infrastructure needs.	Comment noted.	None
2	Alignment with DWSRF IUP	California Association of Mutual Water Companies	<b>Alignment with DWSRF and IUP:</b> CalMutuals strongly supports the alignment of EDWG guidelines with the Drinking Water State Revolving Fund (DWSRF) and its Intended Use Plan (IUP). They support funding for systems addressing compliance challenges related to contaminants like hexavalent chromium (Cr(VI)), PFAS, and others, even before being designated as "failing." Early intervention is emphasized as a cost-effective approach.	Comment noted.	None
3	Project Selection and Communication	California Association of Mutual Water Companies	<b>Outreach:</b> Encourages State Water Board staff to clarify how newly eligible systems will be notified of their eligibility and whether additional outreach and technical assistance will be provided. Many small systems may benefit from additional time to evaluate best available technologies, assess costs, and consider compliance alternatives, but will require direct support from the State to do so effectively.	Comment noted. An email notification of the revised EDWG guidelines, if adopted, will be distributed. To date, projects included in Rounds 1 through 5 have been projects with existing active planning or TA projects or construction applications that are in house with DFA. Should EDWG shift to a solicitation or become a continuous application process, further notification of this change will be distributed.	None
4	Funding Process	California Association of Mutual Water Companies	<b>Streamlining Funding Processes:</b> CalMutuals is encouraged by the EDWG Program's emphasis on reducing procedural barriers that delay project delivery, including the ability to apply for multiple phased projects within a single application. Recommends further simplification of funding processes to reduce procedural barriers, recognize prior planning efforts, and improve coordination across funding sources. CalMutuals advocates for a more efficient system to help small systems with limited administrative capacity access resources.	Comment noted. State Water Board staff continue to identify and implement ways to simplify and streamline our funding processes within the limitations and requirements associated with each funding source that we administer.	None
5	Alignment with DWSRF IUP	City of Los Banos	<b>Support for Alignment with DWSRF IUP:</b> The City supports aligning the EDWG guidelines with the DWSRF IUP, particularly the eligibility criteria for funding. This alignment is crucial for addressing hexavalent chromium contamination in the City's groundwater wells.	Comment noted.	None
6	Hexavalent Chromium	City of Los Banos	<b>Hexavalent Chromium:</b> The City appreciates the inclusion of language in the guidelines that recognizes systems with hexavalent chromium exceedances as eligible for funding, even if they are not formally listed as failing. This change removes ambiguity and allows the City to seek funding earlier.	Comment noted.	None
7	Funding Eligibility	City of Los Banos	<b>Eligibility for Construction Funding:</b> The City supports revisions to Section 4.2, which clarify that medium-sized systems serving disadvantaged communities are eligible for construction funding under the EDWG program. Additionally, planning funds could be reimbursed through construction agreements if eligibility requirements are met, as outlined in the DWSRF IUP.	Comment noted.	None
8	Current Application	City of Los Banos	<b>Current Funding Application:</b> The City has already submitted a DWSRF application and is in the planning and design phase for treatment infrastructure to comply with hexavalent chromium regulations. Treatment costs are expected to exceed \$50 million with additional O&M costs. The City emphasizes the importance of the proposed EDWG revisions in enabling participation in the program during the construction phase.	Comment noted.	None