

Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund Response to Comments received February 3, 2020

Submitted by:	Commenter(s)	Comment Topic	Comment Letter Identifier Number	Comment Number	Summary of Comment Received	Response to Comment
Emily Rooney	Agricultural Council of California	Program Objectives	1	ACC-01	Add measurable goals and timelines to achieve and resolve the drinking water problem	Additional metrics have been added. The FEP will include the specific numeric targets.
Emily Rooney	Agricultural Council of California	Prioritization of Funds	1	ACC-02	Recommended prioritization of funds: interim water; planning for long-term solutions; operation and maintenance for systems serving small populations in disadvantaged communities; capital costs; technical assistance	See proposed changes to prioritization.
Emily Rooney	Agricultural Council of California	O&M	1	ACC-03	Which systems would be eligible to receive Operations and Maintenance funding? Add more details to eligibility requirements.	More details have been added.
Emily Rooney	Agricultural Council of California	Definitions	1	ACC-04	Define "Administrators" more specifically. Add in thresholds for qualifications or leadership experience Define "Affordability Thresholds". Define "Consistently Fails".	No changes made terms are defined in statute or other policy documents adopted by the Board.
Emily Rooney	Agricultural Council of California	Responsible Party	1	ACC-05	"Responsible Party" should only be listed if the State Water Board has gone through a full adjudicatory process that finds that a person is a responsible party under the law.	Definition of responsible party not added to Section IV Definitions. Policy states that we may fund projects even when there is a responsible party.
Emily Rooney	Agricultural Council of California	Responsible Party	1	ACC-06	"Funding Obligation" language in the Draft policy creates perceived liability. Instead the Draft Policy language should place the responsibility of funding back on the State Water Board. In the case the project is not funded (for lack of funding), responsibility does not lie on the responsible party.	No change necessary. Current language distinguishes responsible parties from dischargers pursuing alternative compliance pathways.
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	O&M	2	ACWA-01	Clarify that the purpose of the Fund should focus on solutions , by providing <i>short-term</i> operation and maintenance support as a bridge until long-term solutions are in place and providing <i>long-term</i> operation and maintenance support only when needed.	Clarification added.
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Prioritization of Funds	2	ACWA-02	Prioritization should focus on immediate health risks, areas where replacement water is required and where there are consistent violations of primary maximum contaminant levels (MCLs) drinking water standards. "a pure and wholesome water supply" should be removed because systems are either considered in compliance or out of compliance.	Reference to "pure and wholesome" removed in section IX.C.

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Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Program Objectives	2	ACWA-03	Acknowledge that each system is different with different needs. Each system's needs should be evaluated in how they reach the long-term solution or goal. Include three general categories that form funding tracks: technical assistance, planning efforts and implementation of project activities.	Text added consistent with recommendation.
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Program Objectives	2	ACWA-04	Include annual funding amount and timeframe for the fund.	Text added consistent with recommendation
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Program Objectives	2	ACWA-05	Remove specifics related to the Fund only being used to assist small disadvantaged communities and edit language in the Introduction in order to generalize and say the Fund can be used to assist <i>all Water Systems receive an adequate and affordable supply of safe drinking water.</i>	Section on Fund purpose in Introduction has been updated to be consistent with statute.
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Program Objectives	2	ACWA-06	Support the use of other funding sources	No changes suggested
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Prioritization of Funds	2	ACWA-07	1. assisting DAC's served by public water systems and low-income households served by a state small water system or a domestic well. 2. Consolidation or extension of service 3. Capital construction costs	Section X.C added on Fund Expenditure Plan priorities consistent with statute (Health and Safety Code Section 116769 (b)).
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Consolidation	2	ACWA-08	Does "linking smaller systems to larger ones" mean consolidation? The size of the system does not necessarily indicate that they are out of compliance or in need of consolidation or extension of service	Removed reference to linking systems.
Melissa Sparks-Kranz Jonathan Young	Association of California Water Agencies California Municipal Utilities Association	Definitions	2	ACWA-09	Use the affordability threshold narrowly as it only relates to water systems that consistently fail to provide safe drinking water and serve DAC's that must charge fees that exceed the affordability threshold. The Draft Policy the term more broadly in three different places.	Changes made consistent with the comments.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Program Objectives	3	CVSC-01	Articulate clear goals for expenditure of the funds in question	See response to ACC-1.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Prioritization of Funds	3	CVSC-02	1. Interim water 2. planning for long-term solutions 3. operation and maintenance for small systems serving small population (less than 25 connections) in DACs 4. capital costs 5. technical assistance	See response to ACC-02.

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David Cory	Board of Directors of the Central Valley Salinity Coalition	Definitions	3	CVSC-03	Define "Affordability Thresholds" more specifically. Currently it is too vague. Will the affordability threshold be a static number for all CA, or calculated on a system-by-system basis? Define "Consistently Fails" more specifically. What does "consistently" mean?	See response to ACC-4.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Program Objectives	3	CVSC-04	The Draft Policy needs to include general program requirements and conditions, so that the public can comment on the requirements.	Added reference to general program requirements document as an appendix.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Definitions	3	CVSC-05	"Pure and wholesome water supply" is not an appropriate legal standard.	See response to ACWA-02.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Program Objectives	3	CVSC-06	Do not include systems with source water contamination based on notification levels, reporting levels and pending	Contaminants of emerging concern pose a risk to a system's ability to provide safe drinking water over the long-term, so it is an appropriate factor to consider. Further explanation has been provided as to how this risk factor will be considered in identifying potential solutions.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Responsible Party	3	CVSC-07	What constitutes a responsible party	See response to comment ACC-05.
David Cory	Board of Directors of the Central Valley Salinity Coalition	Responsible Party	3	CVSC-08	Language implies liability rather than funding responsibilities as identified as part of an alternative compliance pathway. Same as comment ACC-06.	No change necessary. Funding eligibility does not depend on whether there is a responsible party.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-01	Funding Source Acknowledgements (Pages 1 and 17) should include "California Climate Investments" and standard boilerplate funding guidelines language.	Standard language from GGRF Funding Guidelines (FG) p.22 added to Introduction section.
Kelsey Craig	California Air Resources Control Board	Definitions	4	CARB-02	The first paragraph uses the SAFER Drinking Water and Safe and Affordable Drinking Water names interchangeably. It needs to be consistent about which name to use (and note in a footnote early on that the name was changed to SAFER).	Safe and Affordable Drinking Water Fund is used in the Policy only to refer to the Fund and its name as defined in statute. The Fund is one part of the larger SAFER Drinking Water Program. Policy checked for consistency.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-03	Please change the title of the section to "California Climate Investments Requirements"	Revised as suggested.

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Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-04	On page 5, please include Funding Guidelines requirement to evaluate potential project benefits to priority populations per CARB guidance (using a CARB developed benefit criteria table)	Included language to state that evaluation and prioritization will be further defined in the Fund Expenditure Plan and will take into account the GGRF Funding Guidelines. Added reference to priority population maps. Funding Guidelines added as Appendix A to the Policy.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-05	The Funding Guidelines also require that there is a reference to the priority population maps available at: www.arb.ca.gov/cc/sommunityinvestments	See response to CARB-04.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-06	Please state how substantial burdens to priority populations will be identified and how projects that avoid these burdens will be selected, as required by funding guidelines (FG, section III.D.7, p. 15-16).	See response to CARB-04.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-07	Recommending to state how the program will encourage projects that support state goals for urban planning, housing, etc. without adverse impact on priority populations (FG section III.D.5., p.14).	No revision made.
Kelsey Craig	California Air Resources Control Board	Tribal Considerations	4	CARB-08	Please describe how Native American tribal community needs will be identified and addressed (FG Section IV.B.2.).	Work ongoing. No revision made at this time.
Kelsey Craig	California Air Resources Control Board	Tribal Considerations	4	CARB-09	Recommendation: at minimum, contact all federally recognized California Native American Tribes and all California non-federally recognized Native American Tribes listed by the Native American Heritage Commission	Suggestion noted. No revision made.
Kelsey Craig	California Air Resources Control Board	Petitions	4	CARB-10	Petition process should be open to Native American Tribes as well as DACs	No change necessary. Health and Safety Code section 116768.5, subdivision (a)(4) requires the Board to include in the Policy a process for members of a disadvantaged community may petition the board to order consolidation. This is not a funding decision to which the California Climate Investments Funding Guidelines apply. Petition process as included in the first release of the Draft Policy related to Consolidation only. No revision made.

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Kelsey Craig	California Air Resources Control Board	Petitions	4	CARB-11	Please state that SWRCB will send notice of acceptance or denial of petitions to the applicant in writing within 90 days of receipt	See response to CARB-10.
Kelsey Craig	California Air Resources Control Board	Program Objectives	4	CARB-12	facilitate identification of gaps in outreach or monitoring efforts via community petitions	See response to CARB-10.
Kelsey Craig	California Air Resources Control Board	Program Objectives	4	CARB-13	Please facilitate public access to petition process and notification of available funding during the Safe and Affordable Fund Solution List development process.	CARB considers notification of available funding a requirement; see response to CARB-10 for petition process.
Kelsey Craig	California Air Resources Control Board	Funding Requirements	4	CARB-14	Recommending to include statement on remedies for non-performance of grant/loan recipients	Section IX updated to state that general program requirements included as Appendix B to the Policy also includes GGRF specific requirements.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-15	Include a statement on the reporting requirements for GGRF-funded projects	See response to CARB-14.
Kelsey Craig	California Air Resources Control Board	Funding Requirements	4	CARB-16	Information on applications received must be posted prior to award decisions	We explained to CARB that funding will not be awarded on competitive basis. No revision made.
Kelsey Craig	California Air Resources Control Board	Prioritization of Funds	4	CARB-17	Prioritization process should include consideration of priority populations, including GGRF DACs, GGRF LICs/LIHs, and California Native American Tribes.	See response to CARB-04.
Kelsey Craig	California Air Resources Control Board	Program Objectives	4	CARB-18	Overarching considerations should include equity and environmental justice.	No revision made. Program goal of true environmental justice per statute included in introduction.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-19	“Other chronic compliance or water shortage problems” should include adaptation and resilience considerations in the evaluation and prioritization process, in order to comply with requirements for GGRF expenditures	Added some language.
Kelsey Craig	California Air Resources Control Board	Prioritization of Funds	4	CARB-20	Please include in ranking process “readiness of funding recipients to proceed” a statement on whether selection process will consider leveraged/matched funds in ranking projects	No revision made.

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Kelsey Craig	California Air Resources Control Board	Metrics	4	CARB-21	Metrics here or in Fund Expenditure Plan should include those that will be required to report and track GHG and co-benefits: Number of Point-of-Use/ Point-of-Entry devices installed; Hauled water (gallons); Water delivery (vehicle miles travelled); vending machines installed; number of water or energy efficiency measures installed; etc.	Added general language to Section II.B.1 and metrics to Section XI.I
Kelsey Craig	California Air Resources Control Board	Technical Assistance	4	CARB-22	Please provide contact information for how applicants can access technical assistance	No change necessary; applicants may use general pre-application for TA.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-23	Please describe the pathway of input from communities here or in the Funding Guidelines	No revision made. Community engagement described in another section.
Kelsey Craig	California Air Resources Control Board	Program Objectives	4	CARB-24	Identify and maximize opportunities to work with multiple agencies to maximize project benefits	No revision made.
Kelsey Craig	California Air Resources Control Board	GGRF	4	CARB-25	State on pg. 17 or in Fund Expenditure Plan all existing and potential GGRF sources of funding	Added to Section II
Kelsey Craig	California Air Resources Control Board	Program Objectives	4	CARB-26	Applications should be treated in accordance with public records act requirements and that certain information, subject to those requirements, may be publicly disclosed	Added to Section IX
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Other	5	CAMWC-01	In the case of mutual water companies, the customers and shareholders are one and the same, and many are owned and serve communities that are disadvantaged with volunteers serving to administer the companies.	No changes suggested
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Program Objectives	5	CAMWC-02	Most of the Advisory group is made up of people from the Central Valley. The SWRCB should develop a plan that addresses the needs of small water systems statewide	The State Water Board intends to ensure that the Fund Expenditure Plan addresses the needs of water systems throughout the State.
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Program Objectives	5	CAMWC-03	Do not develop another needs analysis from scratch. Use existing tools and resources like "Assessments to Action Approach" or sister agencies expertise	The initial needs assessment was funded by the legislature prior to the passage of SB 200 and updates to the needs assessment are required as part of SB 200. As the Commenter suggests, the State Water Board staff (DDW/DFA) are conducting a preliminary assessment of water systems that are out of compliance to begin near term actions, where necessary, to accelerate the timeframe for getting solutions implemented.

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Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Program Objectives	5	CAMWC-04	Think creatively about applications. Grants are problematic for mutual water companies	The State Water Board welcomes input on how to more efficiently fund necessary projects for water systems.
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Program Objectives	5	CAMWC-05	Reevaluate the need for formal rate studies	The State Water Board commonly supports rate studies for small water systems through its technical assistance providers, so assistance in conducting such studies should be available for any system that needs it.
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Program Objectives	5	CAMWC-06	Include outreach to larger systems to understand what resource they might have the ability and interest to share with struggling systems	The State Water Board appreciates the comment and is in discussions with larger systems regarding support they may be able to provide to smaller systems.
Adán Ortega	California Association of Mutual Water Companies and the Community Water Systems Alliance	Consolidation	5	CAMWC-07	More fully develop the process of consolidation	The State Water Board anticipates that the process for consolidation and appointing administrators will be more fully developed over time as we gain more experience applying these tools.
Cindy Paulson Katie Porter	California Urban Water Agencies	Program Objectives	6	CUWA-01	Additional emphasis is needed on long term sustainability of funded projects/entities.	Changes have been made throughout the document to emphasize long-term sustainability of systems.
Cindy Paulson Katie Porter	California Urban Water Agencies	Definitions	6	CUWA-02	The affordability threshold should be established in a transparent manner with input from stakeholders and the SAFER Advisory Group.	The State Water Board agrees that this is an important issue that requires further discussion with and input from stakeholders.
Cindy Paulson Katie Porter	California Urban Water Agencies	Definitions	6	CUWA-03	Avoid introduction of new terms that would complicate program objectives.	See response to ACWA-2.
Cindy Paulson Katie Porter	California Urban Water Agencies	Program Objectives	6	CUWA-04	The nexus of funding to the contaminant source is important and should be further explored.	The State Water Board anticipates that the processes for addressing these situations will be further defined and streamlined as we gain more experience in addressing them.
Cindy Paulson Katie Porter	California Urban Water Agencies	Metrics	6	CUWA-05	Program metrics should include qualitative as well as quantitative measures.	Additional metrics have been proposed and the State Water Board is open to considering additional metrics as the program evolves.

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Cindy Paulson Katie Porter	California Urban Water Agencies	Consolidation	6	CUWA-06	Forced Consolidations will take engagement from the public and the State Board	The State Water Board understands that, although voluntary consolidations are preferred, non-voluntary consolidations will be required in certain circumstances to protect public health. DDW has been using its consolidation authorities.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-01	Remove "where domestic wells" and only include water systems and state smalls in the purpose	Language left as is. Domestic wells are part of the focus from statute.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-02	Where is the criteria for how funds will be disbursed. The policy lacks details	The criteria for which systems and solutions will be prioritized are identified in the "Evaluation and Prioritization of Solutions" sections of the Policy.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-03	Concurrence with its consistency with Section 106.3 of the Water Code and its support of Section 39719(3)(b) of the Health and Safety Code.	Comment in support - no change requested.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-04	Only customers of the water utility can benefit from any financial support from the Fund (or any grant or loan), not the investors or shareholders	Comment in support - no change requested.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-05	Concurrence with State Water Board's requirement for regular project reporting, as well as the potential conditions for funding (system technical, managerial, or financial audits)	Comment in support - no change requested.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-06	Consider at-risk systems, if not on a par with systems in violation, to be only slightly subordinate to those in violation	Language left as is. At-risk systems implied to still be a priority.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-07	Many small systems receiving financial assistance have neither the scale nor rate structure to support repayment of a DWSRF loan for capital needs. Accordingly, provisions should be made for such systems to access the Fund for long-term capital solutions.	The State Water Board recognizes that many small systems cannot afford to fund their projects solely through a loan. In addition to addressing low interest loans, the Drinking Water Intended Use Plan also addresses funding of capital projects through grants and low-interest loans.
Jennifer Capitolo	California Water Association	Metrics	7	CWA-08	Expansion on metrics listed on pg. 16	The draft Policy has been updated to include additional metrics.
Jennifer Capitolo	California Water Association	Program Objectives	7	CWA-09	Support for petition process in the draft policy	Comment in support - no change requested.

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Cástulo Estrada	Coachella Valley Water District	Program Objectives	8	CWVD-01	Technical Assistance should be available to agencies, such as CVWD, to permit them to carry out activities such as contract management for engineering and coalition building. Furthermore, technical assistance funding could be combined with “planning” to create one category of funding.	Technical assistance services can be provided by public agencies. The State Water Board can also enter into funding agreements to address broad suite of activities (e.g., outreach, securing consolidation agreements, planning, construction) to implement a regional plan, such as that envisioned by CVWD for the East Coachella Valley.
Cástulo Estrada	Coachella Valley Water District	Prioritization of Funds	8	CWVD-02	Funding should include money for coalition building and for community outreach and be granted to agencies focusing on consolidation, such as CVWD.	See response to CWVD-01.
Cástulo Estrada	Coachella Valley Water District	Program Objectives	8	CWVD-03	Grants for activities traditionally categorized as planning activities should not have a funding limit. Alternatively, the current limit of \$500,000 should be raised significantly.	The planning grant ceiling referenced is established in the Drinking Water SRF IUP and does not apply to the funds provided through SB 200.
Cástulo Estrada	Coachella Valley Water District	Program Objectives	8	CWVD-04	CVWD strongly recommends the Water Board establish a schedule for the approval and disbursement of funds. If the Water Board fails to maintain the schedule, CVWD advocates for a “correction” in the form of a scoring advantage in future applications.	The State Water Board is committed to improving and streamlining its processes to reduce the timeline for execution of funding agreements. However, successful and expeditious completion of a funding agreement also requires the submittal of complete, timely, and accurate information from the funding recipient. State Water Board staff are committed to staying in close communication with our funding recipients to assist them through the process. Establishing a specific schedule that would apply to all grants would not be appropriate since grant agreements all vary in complexity, urgency, and the ability of the funding recipient to successfully manage their responsibilities.

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Cástulo Estrada	Coachella Valley Water District	Program Objectives	8	CWVD-05	Once an application has been submitted and logged within the Water Board's system, application requirements should not be altered, unless required by statute.	See response to CWVD#4. As DFA management work to improve processes, the management team will work with staff to ensure that any non-substantive changes (e.g., change in forms) do not result in delays to pending agreements.
Cástulo Estrada	Coachella Valley Water District	Funding Requirements	8	CWVD-06	CVWD recommends adding text to "Section XI.F. The Safe and Affordable Drinking Water Fund Solution List" to clarify that grantees may apply for substantial funding to carry out multiple projects in a planned consolidation. The Policy should also clearly state that an agency/entity may have multiple active grant applications and/or funding agreements in place at the same time.	A discussion regarding regional programs has been added to the Draft Policy.
Cástulo Estrada	Coachella Valley Water District	Funding Requirements	8	CWVD-07	The Policy should clearly state there are no funding match requirements for applicants.	State Board staff do not agree that a broad policy of no match requirements should apply. Match requirements (where a system can afford to provide match) provides an incentive for the system to control overall projects costs, as well as ensuring that the completed project is operated and maintained properly.
Cástulo Estrada	Coachella Valley Water District	Eligibility	8	CWVD-08	The Policy should clearly indicate on-site connection costs are eligible for funding.	The Policy is broad enough to allow the State Water Board to cover connection costs to individual dwellings, so no change in language is proposed. There may be cases in which the State Water Board determines that connection costs to individual dwellings should

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Cástulo Estrada	Coachella Valley Water District	Prioritization of Funds	8	CWVD-09	CVWD recommends the inclusion of the required prioritization for the funding expenditure plan. (1) Assisting disadvantaged communities served by a public water system, and low income households served by a state small water system or a domestic well. (2) The consolidation or extension of service, when feasible, and administrative and managerial contracts or grants entered into for Administrators [pursuant to Section 116686] where applicable. (3) Funding costs other than those related to capital construction costs, except for capital construction costs associated with consolidation and service extension to reduce the ongoing unit cost of service and to increase sustainability of drinking water infrastructure and service delivery.	See response to comment ACWA-07.
Cástulo Estrada	Coachella Valley Water District	Program Objectives	8	CWVD-10	"Section II: Purpose and Objective" should be reorganized so that the purpose of the Policy is first and the purpose of the SAFER program follows.	Purpose and Objective section re-organized as suggested.
J.M. Barrett	Coachella Valley Water District	Program Objectives	9	CWVD-01-1	Technical Assistance should be available to agencies, such as CVWD, to permit them to carry out activities such as contract management for engineering and coalition building. Furthermore, technical assistance funding could be combined with "planning" to create one category of funding.	See response to CWVD-01.
J.M. Barrett	Coachella Valley Water District	Program Objectives	9	CWVD-01-10	"Section II: Purpose and Objective" should be reorganized so that the purpose of the Policy is first and the purpose of the SAFER program follows.	See response to CWVD-10.
J.M. Barrett	Coachella Valley Water District	Prioritization of Funds	9	CWVD-01-2	Funding should include money for coalition building and for community outreach and be granted to agencies focusing on consolidation, such as CVWD.	See response to CWVD-01.
J.M. Barrett	Coachella Valley Water District	Program Objectives	9	CWVD-01-3	Grants for activities traditionally categorized as planning activities should not have a funding limit. Alternatively, the current limit of \$500,000 should be raised significantly.	See response to CWVD-03.
J.M. Barrett	Coachella Valley Water District	Program Objectives	9	CWVD-01-4	CVWD strongly recommends the Water Board establish a schedule for the approval and disbursement of funds. If the Water Board fails to maintain the schedule, CVWD advocates for a "correction" in the form of a scoring advantage in future applications.	See response to CWVD-04.
J.M. Barrett	Coachella Valley Water District	Program Objectives	9	CWVD-01-5	Once an application has been submitted and logged within the Water Board's system, application requirements should not be altered, unless required by statute.	See response to CWVD-05.

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J.M. Barrett	Coachella Valley Water District	Funding Requirements	9	CWVD-01-6	CVWD recommends adding text to “Section XI.F. The Safe and Affordable Drinking Water Fund Solution List” to clarify that grantees may apply for substantial funding to carry out multiple projects in a planned consolidation. The Policy should also clearly state that an agency/entity may have multiple active grant applications and/or funding agreements in place at the same time.	See response to CWVD-06.
J.M. Barrett	Coachella Valley Water District	Funding Requirements	9	CWVD-01-7	The Policy should clearly state there are no funding match requirements for applicants.	See response to CWVD-07.
J.M. Barrett	Coachella Valley Water District	Eligibility	9	CWVD-01-8	The Policy should clearly indicate on-site connection costs are eligible for funding.	See response to CWVD-08.
J.M. Barrett	Coachella Valley Water District	Prioritization of Funds	9	CWVD-01-9	CVWD recommends the inclusion of the required prioritization for the funding expenditure plan. (1) Assisting disadvantaged communities served by a public water system, and low income households served by a state small water system or a domestic well. (2) The consolidation or extension of service, when feasible, and administrative and managerial contracts or grants entered into for Administrators [pursuant to Section 116686] where applicable. (3) Funding costs other than those related to capital construction costs, except for capital construction costs associated with consolidation and service extension to reduce the ongoing unit cost of service and to increase sustainability of drinking water infrastructure and service delivery.	See response to CWVD-09.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-01	We suggest that paragraph 2 of this section be replaced with the statutory language below. (1) Operation and maintenance costs to help deliver an adequate supply of safe drinking water in both the near and long terms. (2) Consolidating water systems or extending drinking water services to other public water systems, domestic wells, and state small water systems. (3) The provision of replacement water, as needed, to ensure immediate protection of health and safety as a short-term solution. (4) The provision of services under Section 116686 for purposes of helping the systems become self-sufficient in the long term. (5) The development, implementation, and sustainability of long-term drinking water solutions. (6) Board costs associated with the implementation and administration of programs pursuant to this chapter.	Section on Fund purpose in Introduction has been updated to be consistent with statute.

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Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Definitions	10	CWC-02	Define "Affordability Threshold" more specifically Define "Cost effective" with recommendations from the Advisory Committee Define "Solutions list"	Regarding the "Affordability Threshold", see response to ACC-04. State Water Board staff anticipate continued dialogue with the Advisory Group and other stakeholders as to what constitutes the most cost effective solution for a given situation. See Section IX.F for a description of the Fund Solution List.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Community Engagement	10	CWC-03	Incorporate the Advisory Committees' input in the Draft Policy and provide a more comprehensive, plain language version in English and in Spanish.	State Water Board staff captured comments made by the Advisory Group and also identified those comments that were supported by multiple members of the Advisory Group. The State Water Board has made the Advisory Group charter available on its web site. Incorporation into the Policy would require any modifications to go before the Board, which does not seem necessary for the Charter. Staff is open to recommendations for additions/corrections to the Bagley-Keane discussion in the Charter.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-04	Include a more detailed discussion on the needs of domestic well and state small communities. Include how data and analysis is being collected and how it may be used to education others (SGMA). Leverage sister agency resources (DWR) and their expertise on drought and water shortage planning and risk assessment.	Additional sentence added to Section X.B.

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Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-06	Include specific longer-term SAFER Program implementation goals, including a 5-year (2025) and 10-year (2030) goal. Develop an implementation roadmap to meet these longer-term SAFER Program implementation goals.	Language added to Section I.A and reference a future separate implementation work plan document.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Metrics	10	CWC-07	Clearly identify short-term needs, such as interim drinking water supplies as well as metrics for identifying whether this requirement is being met	The discussion of metrics has been modified to include tracking of time frames associated with interim drinking water.

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Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	O&M	10	CWC-09	There should be additional discussion on the topic of O&M at future Advisory Committee meetings.	Additional discussion on O&M has been added to the draft Policy and will be discussed with the Advisory Group
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-10	Include a discussion on how to assist with systems that right now are impacted by unsafe water but may not be in violation	Additional discussion has been added to the Evaluation and Prioritization of Solutions for At-Risk Systems section of the Policy.

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Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-11	Include a discussion on how addressing drought and water shortage resiliency can be an element of meeting the Safe and Affordable Drinking Water Fund climate change resiliency requirement	Reviewed existing language. No additional language added.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Program Objectives	10	CWC-12	Identify regional solutions and use DDW and other local resources	A section discussing regional solutions has been added to the Draft Policy.
Jonathan Nelson Jennifer Clary Sean Bothwell Arnie Sowell, Jr. Melissa Romero Samuel Molina Linda Escalante Raul Barraza, Jr. Matthew Baker Nathaniel Kane	Community Water Center Clean Water Action California Coastkeeper Alliance NexGen California California League of Conservation Voters Mi Familia Vota Natural Resources Defense Council Arvin Community Services District Planning and Conservation League Environmental Law Foundation	Community Engagement	10	CWC-13	Improved Community Engagement; include new metrics related to public and community engagement; include a discussion in the Draft Policy related to community capacity building	Language added to Section VIII.E. Three metrics around community engagement added to Section X.I: # of Advisory Group meetings # of community meetings # of meeting attendees

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Arnold Sargent	Country Sunshine Cattle LLC	Program Objectives	11	CSC-01	Does not agree with the creation of the Fund.	The commenter expressed general opposition to the program. No changes were made in response to the comment.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Program Objectives	12	DHH-01	Against Sovereign immunity waiver requirements or requirement that information (well information disclosure/water usage) be disclosed	The State Water Board will work with tribal representatives and the Indian Health Services to develop funding requirements that are mutually acceptable.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Community Engagement	12	DHH-02	Outreach is insufficient	The State Water Board staff apologize for the information not being distributed to tribal representatives. We are increasing our staff resources in our Office of Public Participation and are working to improve our communication/outreach to Native American tribes.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Community Engagement	12	DHH-03	Lack of Information Accessibility	The State Water Board is working on improvements to its website to help improve the accessibility of information related to drinking water for small communities.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Program Objectives	12	DHH-04	Sovereign immunity	See response to DHH-01
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Program Objectives	12	DHH-05	Include EPA Region 9 violations, not just State PWS violations	Added US EPA Region 9 violations to 'Identification of Water Systems Needing Solutions' section.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Community Engagement	12	DHH-06	Outreach is insufficient	See response to DHH-02

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Jonathan Rash	Department of Health and Human Services, Indian Health Service	Program Objectives	12	DHH-07	Sovereign immunity	See response to DHH-01.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Tribal Considerations	12	DHH-08	Use of Technical assistance providers, so that Tribes could receive assistance without perceived threats to sovereignty	Technical assistance is currently available to Native American tribes, provided the tribal area requiring assistance is a disadvantaged community. There are no sovereign immunity related requirements for a tribe to receive technical assistance.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Tribal Considerations	12	DHH-09	Coordination with the federal government to ensure Tribal water systems are on equal footing as state-regulated systems	See response to DHH-05
Jonathan Rash	Department of Health and Human Services, Indian Health Service	Tribal Considerations	12	DHH-10	Set aside a percentage of funding for Tribal public water systems.	The State Water Board will consider funding of tribal and non-tribal water systems using the same prioritization and evaluation criteria, rather than creating specific set-asides for tribal and non-tribal systems.
Jonathan Rash	Department of Health and Human Services, Indian Health Service	O&M	12	DHH-11	Bridge the O&M funding gap	See response to ACC-03.
Dawn White	Golden State Water Company	Metrics	13	GSWC-01	Emphasize population as a metric, as well as the number of systems brought into compliance	Population has been added as a metric.
Dawn White	Golden State Water Company	Prioritization of Funds	13	GSWC-02	Project should be prioritized based on population after risk prioritization is met	The State Water Board agrees that the lowest cost per person benefiting is an important criteria, however, it is also important for the Board to fund projects in less densely populated areas in which the cost per person is relatively high. Board staff will continue to work with the Advisory Group to balance the need to ensure the funds benefit the greatest number of people while not leaving communities behind due solely to cost efficiency considerations.
Dawn White	Golden State Water Company	Prioritization of Funds	13	GSWC-03	Sustainable solutions should be prioritized over long-term O&M funding	The draft Policy includes provisions consistent with the comment. In addition, DFA routinely requires total life-cycle costs to be analyzed as part of any alternatives analysis.

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Dawn White	Golden State Water Company	Definitions	13	GSWC-04	Define "Affordable" and the difference between "Affordability and an individual's ability to pay	Language added to definition of affordability threshold in Section IV.
Shivaji Deshmukh	Inland Empire Utilities Agency	Program Objectives	14	IEUA-01	Provide upfront funding for projects	Senate Bill 200 does not include explicit authority to provide upfront funding or advance payment. However, Propositions 1 and 68 do allow for advance payment. State Board staff will work on developing the proposed policy changes and procedures associated with advance payment for the Board to consider as part of the Drinking Water SRF IUP.
Shivaji Deshmukh	Inland Empire Utilities Agency	Petitions	14	IEUA-02	How can individual systems appeal a determination established in the two-step process presented in the Draft Policy?	Section added on appealing a funding determination.
Shivaji Deshmukh	Inland Empire Utilities Agency	Eligibility	14	IEUA-03	Add Project feasibility and the ability to leverage other funding sources as a metric to understanding a project's viability	Project feasibility has been added to the list of overarching considerations. The ability to leverage other funds, however, may bias funding towards those systems that are skilled or experienced in getting grant funding to the detriment of those small systems most in need of assistance, who do not have the capacity to dedicate staff to seeking grant funds.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Community Engagement	15	LCJA-01	Improved accessibility for DAC representatives to attend meetings and communication (translation materials)	We appreciate the feedback and will work to continually improve the accessibility of our meetings.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Definitions	15	LCJA-02	Define "True environmental justice"	Updated language to more closely cite HSC Section 116765 (j).
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-03	Expenditure plans should include analysis regarding planned and possible drinking water solutions for at least a five year period.	The State Water Board agrees and will include such projections in the Fund Expenditure Plan prepared in 2021, in order to incorporate the results of the first needs analysis.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Community Engagement	15	LCJA-04	Improved community engagement including having a comment period of 45-days for public documents	A section discussing community engagement has been added to the Draft Policy. Staff do not agree that the Policy should require a certain number of public workshops or an extended public comment period.

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Michael Claiborne	Leadership Counsel for Justice and Accountability	O&M	15	LCJA-05	fill the O&M long-term gap	See response to comment ACC-03
Michael Claiborne	Leadership Counsel for Justice and Accountability	Definitions	15	LCJA-06	Define "Affordability Threshold" more specifically	See response to comment ACC-04.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-07	Improved discussion on state smalls and domestic wells	More details have been added.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-08	Include risks of failure due to drought, falling water tables, and wildfire and mandated consolidations for systems defined as "at risk"	The potential risk factors have been included. The State Water Board will need to examine on a case by case basis whether its authority to mandate consolidations extends to an "at-risk" system.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-09	Expand on job development and training programs (administrators)	Additional details have been added regarding the proposed approach to community workforce development and training.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-10	Responsible parties should pay for solutions to the drinking water problems that they have caused.	The comment is in support of the discussion in the Policy, so no change is proposed.
Michael Claiborne	Leadership Counsel for Justice and Accountability	Program Objectives	15	LCJA-11	Support for the petition process. Also include other ways to indicate the level of community support. Include more detail on which additional factors the State Water Board will consider in evaluating the petition.	Minor revisions were made to the section on the petition process for consideration of consolidation. A section on appealing a funding determination was added.
James Peifer	Regional Water Authority	Prioritization of Funds	16	RWA-01	Priority 1: Leverage Funds to expand total funding available	The Solution List will identify likely or potential funding source, which will include funds available in the Safe and Affordable Drinking Water Fund, from general obligation bonds, or from the drinking water SRF.
James Peifer	Regional Water Authority	Program Objectives	16	RWA-02	Focus improvements based on populations served as opposed to communities and schools served	See response to comment GSWC-01.
James Peifer	Regional Water Authority	Definitions	16	RWA-03	Include affordability in its identification, evaluation, and prioritization of systems. Define "affordability threshold" with great care.	See response to comment ACC-04.

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Suzanne Anarde Thomas Collishaw	Rural Community Assistance Corporation Self-Help Enterprises	Program Objectives	17	RCAC-01	Prescribe specific authority to the Advisory Committee and to ensure that the Group's recommendations are seriously vetted by the Board.	The State Water Board staff carefully consider all comments made by the Advisory Group members and other stakeholders. SB 200 establishes the role of the group as advisory and does not assign any other authority to the group.
Suzanne Anarde Thomas Collishaw	Rural Community Assistance Corporation Self-Help Enterprises	Program Objectives	17	RCAC-02	Support of the use of resident petitions. Define an appropriate threshold of signatures that balances local initiative against minority rule. The Policy should require the Board to respond to all petitions received, even when the Board decides against taking action.	Minor revisions were made to the section on the petition process for consideration of consolidation. A section on appealing a funding determination was added.
Suzanne Anarde Thomas Collishaw	Rural Community Assistance Corporation Self-Help Enterprises	Consolidation	17	RCAC-03	Consolidation projects that include the assumption of operations/maintenance of a subsumed water system should, at minimum, upgrade the subsumed system to current standards so a consolidating entity does not inherit deferred maintenance or substandard design. Consolidation projects should be fully grant-funded so ratepayers of the consolidating entity do not have to fund expenses related to the consolidation. Improve Incentives.	State Water Board staff agree that the consolidating entity's existing ratepayers should not have to pay for costs, including deferred maintenance, associated with subsuming a system. Staff also agree that the Fund Expenditure Plan and drinking water SRF IUP should include additional incentives to promote voluntary consolidation.
Suzanne Anarde Thomas Collishaw	Rural Community Assistance Corporation Self-Help Enterprises	Program Objectives	17	RCAC-04	Provide guidelines, examples on what activities would qualify to satisfy Climate Change requirements. Actively promote such projects.	State Water Board staff will be working closely with the Air Resources Board and our stakeholders to identify the types of activities/projects that will satisfy the Greenhouse Gas Reduction Fund requirements and staff will make available fact sheets or other material to help guide development of propose projects.

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Suzanne Anarde Thomas Collishaw	Rural Community Assistance Corporation Self-Help Enterprises	Eligibility	17	RCAC-05	Clarify Determination of Income eligibility metrics	State Water Board staff will work on developing fact sheets and other material to explain the relationship between the different income eligibility related terms. The State Water Board is managing funds that are established in different statutes, which at times have similar terms with different definitions.
Mary-Ann Warmerdam	Rural County Representatives of California	Program Objectives	18	RCRC-01	concurrence with the Draft Policy's objective to harmonize SWRCB's existing financial resources and technical capabilities through the Division of Drinking Water's Division of Financial Assistance with the new funding stream provided by the Greenhouse Gas Reduction Fund (GGRF) and General Fund.	Comment in support - no change requested.
Mary-Ann Warmerdam	Rural County Representatives of California	Definitions	18	RCRC-02	Define DAC as posited in the Draft Policy that would broadly incorporate all areas of the state through the lens of statewide median income.	Comment in support - no change requested.
Michael Peterson	Sacramento County Water Agency	O&M	19	SCWA-01	Clarify that the purpose of the Fund should focus on solutions , by providing <i>short-term</i> operation and maintenance support as a bridge until long-term solutions are in place and providing <i>long-term</i> operation and maintenance support only when needed.	See response to ACWA-01.
Michael Peterson	Sacramento County Water Agency	Prioritization of Funds	19	SCWA-02	Prioritization should focus on immediate health risks, areas where replacement water is required and where there are consistent violations of primary maximum contaminant levels (MCLs) drinking water standards. "a pure and wholesome water supply" should be removed because systems are either considered in compliance or out of compliance.	See response to ACWA-02.
Michael Peterson	Sacramento County Water Agency	Program Objectives	19	SCWA-03	Acknowledge that each system is different with different needs. Each system's needs should be evaluated in how they reach the long-term solution or goal. Include three general categories that form funding tracks: technical assistance, planning efforts and implementation of project activities.	See response to ACWA-03.
Michael Peterson	Sacramento County Water Agency	Program Objectives	19	SCWA-04	Include annual funding amount and timeframe for the fund.	See response to ACWA-04.

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Michael Peterson	Sacramento County Water Agency	Definitions	19	SCWA-05	Use the affordability threshold narrowly as it only relates to water systems that consistently fail to provide safe drinking water and serve DAC's that must charge fees that exceed the affordability threshold. The Draft Policy the term more broadly in three different places.	See response to comment ACC-04. Existing references reviewed for consistency.
Michael Peterson	Sacramento County Water Agency	Prioritization of Funds	19	SCWA-06	Priority should be focused on the number of people, not the number of communities	See response to GSWC-01
Melissa Frank	The Wonderful Company	Prioritization of Funds	20	WC-01	Prioritize drinking water systems in disadvantaged communities that meet the "underperforming" or "at-risk of failing" metrics in addition to communities with the most serious drinking water violations	See response to ACC-02.
Melissa Frank	The Wonderful Company	Prioritization of Funds	20	WC-02	Prioritize small water systems.	See response to CAMWC-02.
Melissa Frank	The Wonderful Company	Prioritization of Funds	20	WC-03	Ensure funds are available to support hard infrastructure improvement projects, as well as ongoing operations and management costs ("O&M"), particularly for small systems	See response to ACC-03.
Melissa Frank	The Wonderful Company	Program Objectives	20	WC-04	include measurable goals and a concrete timeline	See response to CUWA-05, CWA-08.
Melissa Frank	The Wonderful Company	Prioritization of Funds	20	WC-05	include a specific streamlined process by which funds are to be allocated to the communities in need without significant regulatory or bureaucratic hurdles	Staff has added a discussion regarding improving administrative efficiency.
David Loveday	Water Quality Association	Program Objectives	21	WQA-01	Support of POU/POE devices on a short-term or long-term basis in various parts of the Policy	POU/POE devices are listed as an example of a type of interim replacement water solution in Section VII of the Policy.
David Loveday	Water Quality Association	Definitions	21	WQA-02	WQA would like to be included in the list of individuals with knowledge of a water system's needs, seeing that they are subject matter experts (WQ and TA)	The Draft Policy has been revised to indicate DFA may also consult with industry and professional associations.
David Loveday	Water Quality Association	Program Objectives	21	WQA-03	Support for a POE/POU implementation program with the following components : 1. initial assessment/ testing 2. consultation with a water utility 3. installation of third-part certified water treatment products and solutions by a licensed professional 4. water quality monitoring program	JK NOTE - please check with Kim H. and Eugene Lueng to see if they concur. State Water Board staff agree that a structured approach for POU/POE is important. We will work with WQA and other interested stakeholders to determine what additional guidance, in addition to the State's regulatory requirements, would be helpful to ensure the POU/POE devices are used safely and effectively.

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David Loveday	Water Quality Association	Program Objectives	21	WQA-04	Improved Consumer Education via POU/POE program. WQA can serve as a resource.	See response to WQA-3.
Gail Delihant	Western Growers Association	Program Objectives	22	WGA-01	Add measurable goals and timelines to achieve and resolve the drinking water problem	See response to CUWA-05, CWA-08.
Gail Delihant	Western Growers Association	Prioritization of Funds	22	WGA-02	Recommended prioritization of funds: interim water; planning for long-term solutions; operation and maintenance for systems serving small populations in disadvantaged communities; capital costs; technical assistance	See response to ACC-02.
Gail Delihant	Western Growers Association	Definitions	22	WGA-03	Define "Administrators" more specifically.	See response to ACC-04.
Gail Delihant	Western Growers Association	Definitions	22	WGA-04	Define "Consistently Fails".	See response to ACC-04.
Gail Delihant	Western Growers Association	Funding Requirements	22	WGA-05	The Draft Policy needs to include general program requirements and conditions, so that the public can comment on the requirements.	See response to CVSC-04.
Gail Delihant	Western Growers Association	Definitions	22	WGA-06	"Pure and wholesome water supply" is not an appropriate legal standard.	See response to ACWA-02.
Gail Delihant	Western Growers Association	Program Objectives	22	WGA-07	Do not include systems with source water contamination based on notification levels, reporting levels and pending	See response to CVSC-06.
Gail Delihant	Western Growers Association	Responsible Party	22	WGA-08	What constitutes a responsible party	See response to comment ACC-05.
Gail Delihant	Western Growers Association	Responsible Party	22	WGA-09	Language implies liability rather than funding responsibilities as identified as part of an alternative compliance pathway. Same as comment ACC-06.	See response to comment CVSC-08.