

No.	Date of Comment	Commenter and Organization	Summary of Comments	SWRCB Staff Response to Comments	Proposed Changes (Yes/No)	Proposed change to language in Guidelines
1	2/19/2026	Clare Swithbank-Bowman, Trash4Tokens	<p>1. Explicitly recognize "trash interception/prevention" as an eligible water quality improvement st</p> <p>2. Clarify that non-structural, community-based prevention pilots can qualify as "Implementation Projects."</p> <p>3. Provide a clear standard for documenting "water quality benefit to California" for binational projects. For projects located in Mexico (e.g., Tijuana River tributaries), please clarify acceptable documentation types.</p> <p>4. Confirm that binational coordination letters are strongly encouraged and scoreable.</p> <p>5. Clarify allowability of "results-based participant incentives" as a direct implementation cost. Trash4Tokens relies on performance-based payments for verified, separated recyclables (e.g., \$5 per 2 pounds). These are not "handouts"; they are documented, results-based service payments tied to quantifiable trash load reductions and verified collection records. We recommend DFA clarify whether such payments may be budgeted as:</p> <ul style="list-style-type: none"> <li>• a direct project implementation cost (preferred), or</li> <li>• a contracted service cost (e.g., vendor/partner pays participants) with auditable records.</li> </ul> <p>6. Confirm that personal protective equipment (PPE), tools, and safety supplies for waste collectors are eligible.</p> <p>7. Clarify that data systems and digital tools are eligible when integral to verification and reporting.</p> <p>8. Confirm that monitoring technology (including Artificial Intelligence (AI)-enabled river cameras) is eligible.</p> <p>9. Provide guidance for operation and maintenance (O&amp;M) expectations for community-based programs with scalable phases. For programmatic implementation (collection + verification + outreach), please clarify how DFA views "useful life" and O&amp;M.</p> <p>10. Provide sample performance measures for "trash load reduction" projects.</p> <p>To strengthen accountability and comparability across proposals, DFA could include example PAEP metrics in Guidelines.</p> <p>11. Clarify documentation options for disadvantaged communities (DACs)/severely disadvantaged communities (SDACs) and "vulnerable population" benefit in border neighborhoods. Please clarify what mapping/documentation is preferred (e.g., CalEnviroScreen, census tract MHI, community-defined project area maps) so applicants can demonstrate "meaningful and direct benefits" without ambiguity.</p>	<p>1. The Guidelines provide Primary Score Descriptions in Appendix C, Section A, on pages 21-22. Water quality improvement projects are defined as those that measurably reduces contaminants such as bacteria, nutrients, trash, sediment, toxics, or untreated wastewater. Therefore, a "trash interception/prevention" project would be considered an eligible water quality improvement strategy.</p> <p>2. The Guidelines have been updated to expand the definition of an Implementation Project in Appendix E, which now includes reference to non-structural elements.</p> <p>3. Due to the number of potential applicants and varying project types, it is difficult to capture all possible ways to adequately provide all types of documentation that would satisfy this requirement. Applicants are encouraged to propose their intended form of documentation in the application for DFA's consideration. Regional Board's will be consulted if any questions arise.</p> <p>4. Yes, binational coordination letters are strongly encouraged, and projects will receive additional points if submitted. This is a new optional requirement for the Border projects. At this time, we do not have specific examples to provide.</p> <p>5-8. The Guidelines have been updated to expand the list of eligible expenses.</p> <p>9. The estimated period over which the funded Project will serve its intended purpose in a cost-effective manner from the completion of construction/implementation date." The equipment cannot be used to satisfy the useful life scoring because the intended purpose of the project is trash collection. The useful life of the project would be how long trash removal would take place.</p> <p>Yes, an O&amp;M plan that transitions to local funding partners after the grant is acceptable.</p> <p>10. Due to the unanticipated number of potential applicants and project types, the draft Guidelines have not been updated to list specific performance measures that would be considered acceptable to evaluate a Project's performance and effectiveness. The items identified in this comment would be considered appropriate performance measures. Applicants are encouraged to propose their intended performance measures in the application for DFA consideration. The DFA Project Manager will provide specific examples to applicants/Projects that are selected for funding.</p> <p>11. Revisions to Appendix B, Workplan Outline for the DAC/Vulnerable Population section have been added to the draft Guidelines for clarification. The border coordinator CNRA has developed a mapping tool that must be used to verify DAC/SDAC status. A link to this has also been added to the Guidelines.</p>	Yes	<p>1. No proposed changes.</p> <p>2. DFA proposes to add the following text to the definition of implementation projects on page 25: "Pilot projects that improve the water quality of the transboundary rivers are also considered implementation projects."</p> <p>3. No proposed changes.</p> <p>4. No proposed changes.</p> <p>5-8. DFA proposes to add the following language to the list of eligible expenses on page 12:</p> <ul style="list-style-type: none"> <li>• "Workforce education and training, contractor, and job opportunities for vulnerable populations (section 90610),"</li> <li>• "Personal Protective Equipment, tools, and safety supplies,"</li> <li>• "Software or programs needed for project implementation or monitoring,"</li> <li>• "Equipment needed for water quality monitoring or project effectiveness,"</li> </ul> <p>9. No proposed changes.</p> <p>10. No proposed changes.</p> <p>11. Reference to the California Natural Resource Agency (CNRA) Guidance Document and mapping tool has been added to the Guidelines on pages 5 and 20.</p>
2	3/12/2026	Francisco Zamora, Sonoran Institute	<p>1. Consider allowing a recipient to meet post-project O&amp;M requirements through a collaboration agreement with a partner entity involved in the project. As a nonprofit organization and for these type of projects, such agreements with partner agencies are an anticipated outcome of project implementation rather than something that can reasonably be secured prior to the project's start. Allowing recipients to formalize these agreements during project implementation would better reflect the collaborative nature of these projects and support successful long-term stewardship.</p> <p>2. Consider allowing a limited advance payment of up to 10% of the total project cost. This flexibility would reduce financial risk while still maintaining the overall reimbursement framework.</p> <p>3. Provide Flexibility for Binational Projects. The program should explicitly allow grant funds to support binational planning, monitoring, and coordination activities, which are often essential for addressing cross-border watershed issues. In addition, the guidelines should provide a simplified documentation process for partnerships with Mexican non-governmental organizations (NGOs), universities, and government agencies, recognizing that institutional structures and administrative processes differ across the border. Where formal cooperation frameworks already exist—such as those facilitated through the International Boundary and Water Commission (IBWC)—the guidelines should recognize these agreements rather than requiring new formal agreements for each project.</p> <p>4. Clarify Administrative Cost Allowance. An administrative cost coverage of up to 20% would reflect the realities of managing multi-partner projects and help ensure that nonprofit organizations and local governments have the capacity to effectively administer grants while maintaining strong accountability and oversight.</p> <p>5. Expand Eligibility for Habitat Restoration Projects. Although the guidelines appropriately prioritize water quality improvements, they may unintentionally limit projects that restore river ecosystems and provide direct water quality benefits. Activities such as riparian habitat restoration, floodplain reconnection, and large-scale trash removal can significantly improve water quality by stabilizing riverbanks, filtering pollutants, and reducing debris that can impair waterways. The guidelines should clarify that these types of restoration activities are eligible.</p>	<p>1. Post project O&amp;M can be satisfied by allowing recipients to partner with another organization/partner entity. The Guidelines allow flexibility for this. Sonoran Institute can describe suggested O&amp;M collaboration in the application.</p> <p>2. Advance Payment language has been added to Section IV. A.</p> <p>3. Costs for coordination with binational entities to make projects more effective are eligible project costs. The DFA is not requiring new agreements to be implemented in order to get additional points in the scoring table. Existing agreements or proof of coordination may be updated to Attachment 4 of the Application.</p> <p>4. Administration costs may exceed 20% when the budget is prepared for the application. If selected for funding these costs will be paid on a reimbursement system, meaning costs must be incurred and documentation must be provided to pay the recipient.</p> <p>5. Clarification will be added to Guidelines.</p>	Yes	<p>1. No changes proposed.</p> <p>2. Advance Pay language has been added to the Guidelines in Section VI.A.</p> <p>3. Education, Outreach and Coordination necessary for project implementation is listed in eligible costs.</p> <p>4. No changes proposed.</p> <p>5. Added the following language on page 24 under habitat restoration: "removes trash; and/or Implements floodplain reconnection."</p>
3	3/12/2026	Peggy Price, Imperial County	<p>1. Suggest tiered scoring for SDACs: To ensure the scoring system meaningfully advances these equity requirements, recommend a tiered scoring approach that differentiates between DACs and SDACs. Recommend awarding additional points for SDAC benefit above DAC benefit.</p> <p>2. Reconsider "Readiness to Proceed" scoring points: Readiness scoring, if not carefully calibrated, can become a proxy for institutional capacity and access to pre-development funding. Larger regions can sometimes complete environmental, design, and permitting using internal staffing or existing local funds, but smaller DACs often cannot. The Board can protect both deliverability and equity by explicitly recognizing phased approaches where early tasks include final design and permitting tied to a clear construction schedule and by allowing alternative indicators of readiness for DACs (such as completed feasibility work, secured site control, and documented binational coordination).</p> <p>3. Reduce the weight of match points: Leveraging is valuable, but additional match points can unintentionally tilt awards toward wealthier regions and applicants that can readily assemble cash matches. Recommend limiting the influence of match points overall and to make match scoring equity neutral by clearly recognizing in-kind contributions such as staff time, equipment use, right-of-way/access, and forms of contribution that DACs often provide at significant scale even when cash is limited.</p> <p>4. Publish a preliminary ranked project list and verify fund equity before final awards. That equity review should transparently report the percentage of dollars going to DACs/SDACs, the distribution of awards by watershed/region, and whether any single region is disproportionately funded.</p>	<p>1. DFA agrees that tiered scoring for DACs and SDACs is needed. Revised scoring will give SDACs more points than DACs.</p> <p>2. DFA appreciates the comment and has reduced the total points for Readiness Scoring down from a total of 6 points to 4 points.</p> <p>3. The current guidelines promote fiscal leveraging while ensuring equity by allowing in-kind contributions (e.g., staff time, equipment) to satisfy match requirements. At only 2 points, the match weight is designed to encourage additional resources without creating a barrier for disadvantaged communities. No changes are proposed.</p> <p>4. To expedite funding to impacted communities, the program utilizes internal management and equity reviews rather than a public draft stage. All final award data, including DAC/SDAC percentages and regional distributions, will be published transparently upon the release of the Final Funding List.</p>	Yes	<p>1. Secondary Score Table in Appendix C has been revised so that SDACs receive a separate and distinct score from DACs.</p> <p>2. Readiness Score in Appendix C now has been reduced from 6 points to 4 points.</p> <p>3. No changes proposed.</p> <p>4. No changes proposed.</p>

4	3/13/2026	Jesse Hereford, North American Development Bank (NADBANK)	<p>1. Support inclusion of bilateral financial institutions and cross-border projects.</p> <p>2. Consideration for a portfolio approach for projects.</p> <ul style="list-style-type: none"> <li>Projects are selected and managed as a part of a defined portfolio.</li> <li>If a project cannot secure required counterpart funding within a reasonable predefined period, the State Water Board and applicant may substitute another eligible, pre-screened project within the same portfolio that meets all eligibility and technical criteria, provides comparable or greater water quality benefits, and can proceed within the funding schedule/constraints.</li> <li>Clarify that such substitutions will be subject to the same eligibility, technical, DAC/SDAC, and monitoring requirements as originally selected projects; and</li> </ul> <p>4. Coordinate closely with NADBANK and other bilateral partners like US International Boundary &amp; Water Commission (IBWC) and Comisión Internacional de Límites y Aguas (CILA) to identify and maintain a bench of pre-evaluated, eligible Mexican projects that can be activated as substitutions, ensuring continuity of water quality benefits to California.</p>	<p>1. Thank you for your comment/support.</p> <p>2. To provide regional and cross-border flexibility, the Guidelines have been updated to allow for "Programmatic Proposals" (see Appendix A). This allows applicants to group related sites or phases under a single application. However, once an award is made, post-award substitutions are not permitted to ensure the integrity of the competitive scoring process. Guideline language added to Appendix A.</p> <p>3. All components within a "Programmatic Proposal" must meet the same eligibility, technical, and DAC/SDAC requirements during the initial application and scoring process. Because the Board does not allow post-award substitutions of un-scored projects, this ensures all funded work has been vetted against the program's competitive criteria. Guideline language added to Appendix A.</p> <p>4. The State Water Board maintains ongoing coordination with NADBANK, IBWC, and CILA. We encourage these partners to utilize the new "Programmatic Proposal" framework to align their pre-evaluated regional projects into a single, comprehensive application during the solicitation period.</p>	<p>The following language has been added to the Guidelines in Appendix A. "Grouped Project Proposals: Applicants seeking to address regional or cross-border needs may submit "Programmatic Proposals" that group related sites or phases under a single application. This allows for administrative flexibility while ensuring the total project continues to meet the technical and scoring criteria established at the time of the award."</p>
5	3/13/2026	Matthew Parr, County of San Diego	<p>1. Increase the maximum grant amount available for implementation (construction) projects. The current cap of \$10 million is significantly lower than the cost of most construction-phase projects required to meaningfully address transboundary pollution in the Tijuana River Valley.</p> <p>2. Clarify if state funds can be used as match.</p> <p>3. Clarification if environmental documentation needs to be complete as part of application or just prior to construction.</p> <p>4. Request an additional scoring point for projects that have been supported by the Water Board, via Executive Directors or through board action, to be afforded the additional point. This is particularly important because immediate projects that are urgently needed because of the increased cross-border flows the region has experienced in recent years may not be incorporated into such agreements.</p> <p>5. Request a reduction in the Readiness scoring category so it is not weighted at over 21% of the overall project score.</p> <p>6. Request confirmation that design-only or design-plus environmental applications may be submitted under the implementation category.</p>	<p>1. To maximize the number of projects benefiting from this limited funding source, the \$10 million cap per implementation project will be maintained. This allows for a more diverse distribution of awards across the region. No changes are proposed.</p> <p>2. Per Public Resources Code (PRC) Section 90050, matching funds are defined as "private, federal, and local" sources; therefore, state funds do not qualify as a match. Note that a match is not a requirement for eligibility, but provides a minor (2-point) scoring increase. No changes are proposed.</p> <p>3. Environmental documentation is not required at the time of application, though completed documents may earn additional points. While environmental tasks can be funded as part of an implementation project, all documentation must be finalized before construction begins. No changes are proposed.</p> <p>4. While we recognize the importance of Water Board-supported projects, points are awarded based strictly on the technical criteria in the Guidelines rather than specific board actions or endorsements to ensure competitive equity and a uniform evaluation process. This maintains a transparent and fair process for all applicants. No changes are proposed.</p> <p>5. The Readiness category has been re-evaluated to better balance project maturity with equitable access. The total points for Readiness have been reduced from 6 to 4 in the final scoring rubric.</p> <p>6. Projects focused solely on design or environmental documentation are classified as Planning/Research projects. These applications are subject to the \$750,000 maximum grant amount rather than the implementation cap. No changes are proposed.</p>	<p>Yes</p> <p>1. No changes proposed. 2. No changes proposed. 3. No changes proposed. 4. No changes proposed. 5. The Readiness Points have been adjusted down from a total of 6 points to 4 points. 6. No changes proposed.</p>
6	3/13/2026	Laura Bowen, City of Calexico	<p>1. Recommend ensuring equitable distribution by Geographic location between Tijuana River and New River. Smaller border communities, such as Calexico, operate with more limited resources and should receive equitable consideration.</p> <p>2. Consider scoring projects serving SDACs above DACs.</p> <p>3. Increase maximum implementation grant per project to \$25 million.</p> <p>4. Add in shovel ready definition to Guidelines and allow shovel ready projects to receive additional readiness points.</p> <p>5. Prioritize Projects that mitigate public health impacts.</p> <p>6. Allow for projects that are focused on sediment removal, trash removal and river corridor cleanup.</p>	<p>1. The Guidelines have been updated to ensure geographic equity. The Deputy Director will ensure that at least one project from each river (Tijuana River and New River) is represented on the Final Funding List, provided they meet minimum scoring and eligibility requirements.</p> <p>2. The Secondary Scoring Table in Appendix C has been revised to provide a separate, higher point allocation for projects serving SDACs compared to DACs.</p> <p>3. To ensure the funding can support a diverse range of projects rather than only 1-2 large-scale awards, the \$10 million cap will be maintained. This maximizes the reach of the program across multiple impacted areas. No changes proposed.</p> <p>4. The Readiness scoring category already provides higher points for projects that have completed environmental and design phases (shovel-ready). The existing framework sufficiently prioritizes project maturity. No changes proposed.</p> <p>5. An additional point has been added for projects that address public health impacts. In addition a definition has been added to Appendix C that defines public health impact projects.</p> <p>6. Eligibility language in Appendix C has been clarified to explicitly include sediment removal, trash removal, and river corridor cleanup as eligible project types. Guideline definitions updated.</p>	<p>Yes</p> <p>1. No changes proposed. 2. Secondary Score Table in Appendix C has been revised so that SDACs receive a separate and distinct score from DACs. 3. No Changes proposed. 4. No changes proposed. 5. No changes proposed. 6. Scoring and project eligibility allow for these types of projects. The following language has been added to Appendix C - "Removes pollution, trash, and hazardous waste from a river, its banks, and the surrounding land area to improve environmental health, safety, and water quality."</p>
7	3/13/2026	Patrick McDonough, Coastkeeper	<p>1. Recommend "improvement" projects being scored higher than "preventative" projects. Awarding more points to the prevention of speculative future violations over the correction of massive existing ones is misplaced.</p> <p>2. Recommend adjusting the definition of "improvement" projects. The current definition of an "improvement" project requires that the project "provide water quality benefits beyond mere compliance" with plans, policies, permits, or water quality standards. Requiring projects to go "beyond" compliance to qualify as an "improvement" is not only unrealistic but effectively penalizes the most critically needed projects in the most heavily impacted areas.</p> <p>3. Revise scoring criteria to account for and reward multi-benefit projects.</p> <p>4. The criterion "prevents or intercepts cross-border flows or discharges before reaching receiving waters" should be revised to read "prevents or intercepts cross-border pollutants or pollution."</p> <p>5. Planning or Research projects should receive a lower score than high-impact implementation projects.</p> <p>6. SDAC and DAC points should be awarded separately.</p> <p>7. Recommend a lower score for projects with a useful life of fewer years (e.g. 5-10 years), and higher scores for projects with useful lives of 10-20 years, and then another for 20+ years. Also recommend separate scoring for O&amp;M based on how long it is projected or secured for.</p> <p>8. Replace language in Readiness Table in regards to Environmental Documents from submitted" to a term which more clearly signals that the environmental review process is well underway, and distinguishes this status from a preliminary working draft.</p>	<p>1. The scoring framework is designed to prioritize both the correction of existing water quality exceedances and the prevention of future ones. Both categories are weighted to address critical impacts over projects that do not directly mitigate exceedances. No changes proposed.</p> <p>2. The definition of "improvement" projects has been revised to remove the "beyond compliance" requirement. This ensures that critically needed projects focused on achieving water quality standards are not penalized.</p> <p>3. The scoring rubric has been updated to include specific criteria and additional points for projects that demonstrate multiple benefits.</p> <p>4. The definition has been revised in the Guidelines to focus on the prevention or interception of "cross-border pollutants or pollution" to more accurately reflect program goals.</p> <p>5. Planning and Research project points have been adjusted. Furthermore, these projects are ranked and funded from a separate allocation, ensuring they do not compete with or impact the scoring of high-impact implementation projects.</p> <p>6. The Secondary Scoring Table in Appendix C has been revised to award separate and distinct point values for projects serving SDACs versus DACs.</p> <p>7. The scoring has been adjusted to reward project longevity: 1 point for a useful life of 10-19 years and 2 points for 20+ years. This ensures long-term water quality benefits are prioritized.</p> <p>8. To provide greater clarity, the Readiness Score Table now awards points based on "Final Documents Uploaded" (2 points) or "Draft Documents Uploaded" (1 point). Because projects may be implemented in either California or Mexico, the Guidelines do not specify a single receiving entity; documents submitted to the State Clearinghouse, a local County, or a Mexican Governmental Agency are all acceptable. For scoring purposes, a filed Notice of Exemption (NOE) is considered a final document.</p>	<p>Yes</p> <p>1. No proposed changes. 2. Removed "beyond compliance" from definition "Improvement" (Appendix C). 3. Added a multi-benefit project question to the Workplan and established dedicated scoring criteria (Appendix C). Guideline scoring updated. 4. Revised "Improvement Project" definition (Appendix C): "To qualify as an Improvement Project, the Applicant must demonstrate that the Project will provide water quality benefits and provide long-term resilience or operational benefits..." 5. Planning and Research points have been lowered in Project Score Table (Appendix C). 6. SDACs and DACs are now scored separately in the Secondary Score table (Appendix C). 7. The scoring has been adjusted in Cost Effectiveness Table so projects that have a useful life of 10-19 years receive 1 point and projects with a useful life of 20+ years get 2 points. 8. Status of Environmental Documents in Readiness to Proceed table have been revised to "Final Documents" and "Draft Documents"</p>

8	3/13/2026	<p>Waylon Matson, 4 Walls International</p> <ol style="list-style-type: none"> <li>1. Weight long-term O&amp;M in project scoring.</li> <li>2. Prioritize measurable pollutant reduction with enforceable performance targets.</li> <li>3. Advance upstream prevention to address pollution at its source.</li> <li>4. Reward projects that leverage additional capital and partnerships.</li> <li>5. Require binational coordination to align projects at the watershed scale.</li> <li>6. Support research partnerships that update technical data from Baja California.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Primary Scoring Table and Appendix C definitions have been revised to focus on the prevention and interception of "cross-border pollutants and pollution." Projects will be evaluated based on their technical merit and their ability to address specific water quality exceedances.</li> <li>2. The Primary Scoring Table and Appendix C definitions now explicitly focus on the prevention and interception of "cross-border pollutants and pollution." Projects will be evaluated on their technical ability to deliver quantifiable water quality outcomes and reductions in waste or flows.</li> <li>3. The Guidelines utilize "Corrective" and "Preventative" project classifications to prioritize both the treatment of existing impacts and the prevention of future exceedances at the source. This framework ensures that upstream drivers of pollution are addressed to maximize environmental return. No changes proposed.</li> <li>4. The Guidelines provide scoring incentives (up to 2 points) for leveraging external fiscal resources. Additionally, we are adding "Programmatic Proposals" framework in Appendix A that encourages large-scale partnerships by allowing related regional sites to be bundled into a single application.</li> <li>5. To ensure watershed-scale alignment, Appendix A now allows for "Programmatic Proposals" that group related cross-border projects complement broader regional strategies. No additional changes to require binational coordination proposed.</li> <li>6. The Guidelines include a dedicated "Planning and Research" project type to support data collection and technical studies, including binational research collaborations. There is a \$3 million set-aside for planning or research projects to ensure critical data updates do not compete with implementation funding. No changes proposed.</li> </ol>	Yes	<ol style="list-style-type: none"> <li>1. The scoring has been adjusted in Cost Effectiveness Table so projects that have a useful life of 10-19 years receive 1 point and projects with a useful life of 20+ years get 2 points.</li> <li>2. No changes proposed.</li> <li>3. No changes proposed.</li> <li>4. No changes proposed.</li> <li>5. No changes proposed.</li> <li>6. No changes proposed.</li> </ol>
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