

SWRCB SAFER Final Draft Updates

6/1/2020

Latest Release

Consolidation is higher on the agenda compared to the previous release. There are many more places where the topic of regionalization is discussed. In addition to the number of mentions of this topic, there are quite a few edits that demonstrate the increased prioritization of system consolidation. In the second page list of actions permitted in the SAFER program, consolidation moves up to #2, from the bottom of the list previously. There are two short term objectives discussed in the paper, and consolidation is one of them, showing its increased desirability. Much later in the draft, on the plan priorities section on page 23 consolidation is again shown in a more central light than we have seen previously. Possibly a result of the COVID-19 pandemic or an understanding of the State Water Resource Control Board that regionalization and the extension of service is going to be a more plausible solution to many problems, consolidating is presented far more often in this document.

There is an increased focus on the specific frameworks of funding that was lacking in previous drafts. Much like the increased discussion of health codes, it appears The State Water Resources Control Board attempted to make clear the specific frameworks that will allow the SAFER program to operate. There is more discussion about the Greenhouse Gas Reduction Fund Program and the disadvantaged communities that will be receiving assistance. On page 6 there is a mention of the section of the code that requires GGRF funds to be used in this program as long as they improve the climate change resilience of Disadvantaged Communities (DACs). There are many more mentions of the GGRF fund, including a page 14 where there is a clarification of the communities that are eligible to receive GGRF funding including GGRF disadvantaged communities and GGRF Low-income households or GGRF Low-income communities. There is also a discussion of the California Climate Investment program on page 8 wherein The Water Board explains that the SAFER group is a part of the CCI program, and should work to benefit disadvantaged communities while reducing greenhouse emissions. The added focus on the framework for funding and programs that have been put in place show an effort of The Water Board to explain transparently the movement of funds that will occur that we did not see in as much detail previously.

In the newest version there seems to be a re-prioritization of funds. The Water Board has recognized what kind of funding they would like to achieve and will be possible based on their meetings with the advisory committee and public input. As previously mentioned, the list of spending categories ordered one through six has been reordered, and I believe it is demonstrative of the priorities of The Water Board. The list is now offering the development, implementation, and sustainability of long-term drinking water solutions as 5th on the list, and operation and maintenance costs needed to deliver an adequate supply of safe water as 1st. They have shifted their priorities from ambitious new projects to the maintenance of ongoing costs that will be needed to keep current projects in place and systems operating as they

should. Operations and maintenance costs have been discussed at length during advisory group meetings and are now a larger focus than previously shown. On page 16 we can see that there is a section added for O&M discussion to make sure its purpose is clear. Additionally, on page 26 there is an added point that notes the removal of financial barriers to access capital, including the payoff of outstanding debt obligations, will be undertaken by the water board. This statement marks a change in the prioritization of funds because we have not seen this statement in earlier discussions.

There is more language regarding the usage of the SAFER fund for homeless sanitation and safety, likely as a response to the comments of the advisory group. In the most recent advisory group meeting the discussion of SAFER's obligation to the homeless came to a head, as the majority of the group weighed in to express an opinion. The consensus at the conclusion of the meeting was that all the members would like there to be increased resources provided by the SAFER fund such as running water especially during the COVID-19 pandemic, but they understand that the funds available now will only cover so much. The writing that expresses acceptance of the fund's inability to cover wide-reaching homeless aide programs is a direct response to the discussion at the most recent meeting about funding allocation. Other additional SAFER group and public comments seem to have been acknowledged in the newest version of the paper.

Median Household Income, which is used by The Water Board in determining the income of rate-payers to determine their financial capacity, receives more attention than it has previously. Likely as a result of advisory group and public comments the MHI metric has been given extended explanation in the definition section as well as increased discussion throughout the paper and its own section in Appendix A.

There is a large section on page 18 on emergencies that has been added after much discussion by the advisory group. There is an ongoing back-and-forth discussion regarding the scope of the SAFER Fund's ability when it comes to emergency situations. Many of the members are located in areas that are experiencing emergency water problems like unsafe supplies, and have been pushing for The Fund to take action quickly in those cases. In response SWRCB has created a section on emergency projects, including large scale and system level issues that will hopefully provide some clarification on the ability of the Fund to address those issues.

The addition of a five point workplace development plan may be in response to committee input as well. We have seen sustained discussion about the importance of involving the community and providing work-place opportunities where possible as opposed to bringing in hired workers from outside communities. The Water Board is looking to take into consideration the local advisors' recommendations that potential new hires should come from the community and are now laying out a plan to allow this to happen.