



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

January 29, 2020

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund**

Transmittal Via E-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend:

On behalf of the Rural County Representatives of California (RCRC), I am pleased to submit comments on the “Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund.” RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

RCRC partnered with a variety of stakeholders over the past three years to address critical drinking water needs in disadvantaged communities (DAC) and supported the outcome of this effort via Senate Bill 200 (Monning, 2019). Among the provisions of SB 200 that were of particular importance to rural California’s disadvantaged communities is the authority to fund the operations and maintenance for drinking water facilities to meet current standards.

As you know, SB 200 made great strides in meeting the drinking water needs of California’s most vulnerable communities. Many of the communities SB 200 is designed to assist are suffering the impacts of reduced groundwater availability, due to concerns over quality or quantity. The long-term well-being of these disadvantaged communities may ultimately depend on the sustainability achieved under the Sustainable Groundwater Management Act (SGMA). Until then, the Safe and Affordable Drinking Water Fund (SADWF) is a critical bridge in this endeavor.

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We appreciate the State Water Resources Control Board's (SWRCB) recent convening of the Safe and Affordable Drinking Water Fund Advisory Group on January 13, 2020, as well as SWRCB's ongoing efforts to provide safe and affordable drinking water to economically vulnerable communities. It is encouraging that so many rural Central Valley residents were chosen as "inaugural" advisory members, where the issues of the day are felt most acutely.

We concur 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. The success of SADWF is dependent upon a thoughtful effort to address these systems holistically. Teaming capital infrastructure with these SADWF funds will make a greater impact for meaningful long-term success.

With regard to the "Key Terms and Definitions" in Section VIII, RCRC believes in using median household income as an appropriate marker of a disadvantaged community. For example, California Water Code Section 79505.5, subdivision (a) defines a DAC as a community with an annual median household income that is less than 80 percent of the statewide annual median household income. Similarly, Health and Safety Code Section 116760.20, subdivision (n) defines a severely disadvantaged community as a community with a median household income of less than 60 percent of the statewide average. To that end, we appreciate the definition of DAC as posited in the Draft Policy that would broadly incorporate all areas of the state through the lens of statewide median income. RCRC seeks to ensure that all terms and definitions broadly incorporate all areas of the state, and no single factor—like air quality—disenfranchise rural communities.

Thank you for the opportunity to comment on the "Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund." We look forward to continually engaging with the Board on this issue. If you have any questions, please contact me at (916) 447-4806 or [mwarmerdam@rcrcnet.org](mailto:mwarmerdam@rcrcnet.org).

Sincerely,

A handwritten signature in purple ink that reads "MaryAnn Warmerdam". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

MARY-ANN WARMERDAM  
Senior Legislative Affairs Advocate

cc: The Honorable Bill Monning, Member of the State Senate