

Comment/Response Summary for June 2019 Early Action Plan Draft

Comment No.	Commenter	Section	EAP	Comment (Summarized)	Response
1	Tess Dunham - Somach Simmons & Dunn	General	Both	We need to include the option of Point of Use as one of the alternatives	Incorporated
2	Tess Dunham - Somach Simmons & Dunn	General	Both	Requiring proof of residency with a Real ID and language regarding the need to "apply" should be reconsidered	Proof of residency requirement removed
3	Tess Dunham - Somach Simmons & Dunn	General	Both	Suggest renaming kiosks to filling stations	Change made
4	Tess Dunham - Somach Simmons & Dunn	1.4	Both	Should we include something to the effect that it will be reviewed annually and updated as needed since it may take several years for the Management Zone Implementation Plan to be established?	Section 1.5 added to address this comment
5	Tess Dunham - Somach Simmons & Dunn	Figure 1-1	Both	Add: (a) POU to Temporary Water Provisions; and (b) review element	Incorporated
6	Tess Dunham - Somach Simmons & Dunn	Section 4	Turlock	Clarify meaning of text: "Owner-occupied residences are those that have the same physical and mailing address, whereas tenant-occupied residences have different physical and mailing addresses."	Text removed
7	Tess Dunham - Somach Simmons & Dunn	Section 6 - opening paragraph	Both	Second sentence: How do we define permanent? Long-term might be a better term as we can't guarantee that digging a new well results in permanent but it is long term. Also, the term long-term is consistent with the language that is currently in the trailer bills.	Changed "permanent" to "long-term"
8	Tess Dunham - Somach Simmons & Dunn	6.1	Both	Regarding "primary and secondary sources": We might want different terms so people don't mistake these references to primary and secondary drinking water standards.	Removed use of terms
9	Tess Dunham - Somach Simmons & Dunn	6.1.1.1	Both	Regarding (b): We need to tie into an existing public water system so I think we need to state the location will be designed to serve areas that don't have compliant water but will be strategically and conveniently located in a community that serves as a commerce center for outlying areas.	Modified criteria to address these recommendations
10	Tess Dunham - Somach Simmons & Dunn	6.1.1.4	Both	Regarding 3rd bullet and DDW approval: We need to discuss with DDW how they want us to word this before this becomes a final document. I am going to try and talk with Darrin this week.	No change made at this time; will revisit when final document is in preparation
11	Tess Dunham - Somach Simmons & Dunn	6.1.1.4	Both	Regarding 6th bullet and "notice to the community": Notice seems somewhat passive. I think we need to convey some form of active outreach will occur.	Modified text and referenced new public outreach section
12	Tess Dunham - Somach Simmons & Dunn	6.1.2	Both	Alternative Water Delivery: We need to modify to include Point of Use, but POU is not Water Delivery	Incorporated
13	Tess Dunham - Somach Simmons & Dunn	6.1.2.1	Both	Look at Replacement Water Settlement Agreement - We can't ask about medical disability.	Removed text

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14	Tess Dunham - Somach Simmons & Dunn	6.1.2.1	Both	Regarding residents may apply for bottle water: Make this "request" rather than apply.	Modified text throughout
15	Tess Dunham - Somach Simmons & Dunn	6.1.2.1	Both	Regarding submission of a "completed application": Residents need to be able to make the request and provide an explanation/justification for the alternative mechanism. However, should not characterize as an application.	Modified text to remove reference to an application
16	Tess Dunham - Somach Simmons & Dunn	6.1.2.1	Both	3rd bullet: Regarding: "Applicant is not receiving or is not eligible for alternative water delivery through another existing program" - This is a tough one. If State Board is providing Emergency Bottled Water, they would suggest that it is appropriate for the EAP to take over that function.	Removed the bullet: (a) it may be difficult to determine whether a resident may obtain water from another source; and (b) removal is consistent with other comments regarding making access to safe drinking water as "user friendly as possible"
17	Tess Dunham - Somach Simmons & Dunn	6.1.2.1	Both	Regarding residency demonstration - Does this match what Salinas or the State currently requires? If not, I think that this could be highly problematic.	Removed residency requirement
18	Tess Dunham - Somach Simmons & Dunn	6.1.2.2	Both	General: We need to include a step for considering POU or bottled water delivery.	Addressed
19	JP Cativiela - Dairy Cares	6.1.1	Both	We support the approach of using kiosks as a primary source of safe drinking water in the EAP. Kiosks as defined provide a potentially easy-access and cost-effective solution for temporary water supplies that can be implemented in a relatively short time frame. The document notes that such facilities will be made "available to area residents at no cost." We concur and urge that access to these facilities be made as easy as possible. We do not support requiring identification, entry of special codes or residence addresses, or similar screening processes at this time. Rather, the initial focus should be on making access as easy and user friendly as possible during the initial phase. Use should be monitored for potential problems, and access rules modified if needed. For the purpose of program data collection, we urge careful monitoring of the amount of water dispensed at each location, along with the times, dates and days of the week water is dispensed to allow for use patterns to be analyzed. During meetings to date, concerns have been expressed about wait times, volume of use and other factors. Collection of use data to the degree that it is non-intrusive into users' privacy and does not discourage use of the kiosks will help assess and address any concerns in the future, as well as assessing the adequacy of the system and its cost efficiency.	Kiosks now referred to as "water filling stations" per comment above; added alternative to provide a water containers for pick up rather than stations to dispense water. Combined, filling stations and pick locations referred to as "public access water locations." EAP modified to include monitoring elements generally as described here; EAP does not include an special requirements for obtain water from public access locations.

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20	JP Cativiela - Dairy Cares	6.1.2	Both	We support bottled water delivery as a secondary source of drinking water. We generally support this approach for affected residents who don't have a safe residential source of drinking water, and who cannot access the primary source (kiosks). The draft EAP suggests that an application process be used to determine who is eligible for this service; we concur, but we also urge that the process be as simple as possible. The primary data needed is the delivery address and confirmation via testing that the water at the delivery location does not meet safe drinking water standards. We support documenting the reason for the request for the delivery request (e.g. lack of transportation, distance to kiosk, age or disability, "other") but do not support using those reasons as criteria (that is, their reason for asking for bottled water delivery) to exclude applicants who otherwise qualify because of their location and affected supply. We do not support an identification requirement (e.g. driver's license, proof of residency or citizenship, etc.) as criteria for determining whether to provide delivery.	Identification removed; bottled water remains as one of two alternative water options (see next comment response); revised EAP includes sample alternative water request form that limits what is required to request participation in alternative water program
21	JP Cativiela - Dairy Cares	6.1.2	Both	We support additional options for "alternative water delivery" and/or secondary sources, especially Point of Use (POU) treatment systems. POU's offer an important option for safe, efficient, convenient and cost-effective delivery of safe drinking water. While not feasible in all cases (the quality of water at the residence is a determining factor as to whether POU's treatment systems are viable), POU's can and should be an option for a secondary source of drinking water within these EAPs. Reasons why this should be an option include its potential to achieve reduced costs over time (installation costs tend to be relatively high but are offset by lower maintenance costs compared to bottled water delivery). Also, residents may find this option more desirable and convenient. Another key reason to include this in the EAPs is that it provides a chance to assess and address challenges with POU implementation, such as ongoing maintenance, at a pilot scale. Early inclusion of other options for secondary sources of drinking water (besides bottled water delivery) will help the Management Zones assess which options to prioritize as the program builds out, and also will inform the programs about potential obstacles and challenges that need to be addressed as the program develops. It could also help set the stage for more complex options such as Point of Entry (POE) treatment systems.	POU added as an option

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22	JP Cativiela - Dairy Cares	Various	Both	Community outreach. The EAP should include a strong community outreach component. While mailers and advertising can help affected residents become aware of the opportunity to have their water tested, and opportunities to access safe drinking water, other types of outreach, such as community meetings and canvassing, could help increase awareness and adoption of the program. This would help residents either verify that their existing supply of drinking water is safe, or if not, help them understand and select options for an alternative temporary supply. For this reason, we believe the EAPs in both the Turlock and Alta/East King GSA should include provisions in their budgets to contract a qualified group (at the discretion of the Management Zone authorities), for example a nonprofit group like Self-Help Enterprises, to propose, contract and carry out a community outreach program.	Added section specific to public outreach (5.2). Included a subsection focused on community outreach meetings (5.2.4)
23	JP Cativiela - Dairy Cares	6.1.1.4	Both	Hours and safety of kiosks. Meetings to date have suggested there will be many logistical concerns related to placing drinking water kiosks in locations that ensure enough access while also minimizing impacts on safety of residents, etc. We believe a requirement that kiosks be accessible 24 hours a day, seven days a week at all locations may be counterproductive and therefore do not support a stringent, specific requirement for operating hours. Generally, we believe that kiosks need to be accessible for as many hours a day as possible, especially during typical high-traffic times (early mornings and early evenings), and that they should be open for at least a few hours every day. Hours should be clearly posted on kiosks and alternative locations identified in case a kiosk is temporarily inoperable. Locations should be well-lit and in highly trafficked locations wherever possible for safety reasons.	Revised to state that 24/7 is the goal, but that this goal may not be possible to meet in all areas. Included safety recommendation.
24	JP Cativiela - Dairy Cares	6.1.2.1	Both	Eligibility/exclusion of residents for alternative water delivery. There have been some discussions in steering committee meetings to date about limiting water delivery in certain cases, for example, not providing bottled water delivery to residences located on lands enrolled in the Irrigated Lands Regulatory Program (ILRP). This idea appears to be based on the notion that landowners would be directly responsible for providing safe drinking water to residences located on their own land. We do not support this concept for several reasons, chief among them that it creates a completely different and less transparent process for those residents to access safe drinking water. It also limits the access of dischargers who may be paying for the program to access its services. Overall, we believe it is simpler and fairer for the EAP to cover all residents who do not have access to safe drinking water.	For further discussion if needed; a number of changes have been made to remove/reduce potential limitations. Revisit if needed.
25	JP Cativiela - Dairy Cares	6.1.2	Both	Retesting of wells. The EAP should include a provision that allows residences who have previously had their wells tested to re-test the wells periodically.	Added in an annual retesting option if nitrate > 8 mg/L, as long as EAP is effective

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26	JP Cativiela - Dairy Cares	Section 4, 6.1.2	Both	Administrative efficiency. We understand it is a duty of the Management Zones to identify within the EAP residences and areas that may be affected by poor drinking water quality, for the purposes of determining who may be eligible to receive an EAP-related safe drinking water services. Generally, we support broad identification of areas that may be affected. However, we believe the major focus of the EAP should be on actually offering water services to any eligible residents within the zone. In other words, we believe it is a better use of resources to offer the program broadly to anyone who is eligible, rather than to determine with high resolution in advance of the offer who might be eligible. In particular, we suggest that testing be offered to any management zones residents that request it, unless their wells have a) already been tested recently, or b) they are services by a public water system that has tested the wells and verified the water is safe to drink.	No changes made at this time; recommend this component be discussed by Steering Committee
27	Samsor Safi, Sacramento Regional County Sanitation District	General	Both	A robust stakeholder participation must be maintain at every level of nitrate control program. We want to make sure that, beside dischargers, the State Board's Division of Drinking Water, Local Planning Departments, Local County Health Officials, and GSAs and others are included in the stakeholder process. Section 5 of the Preliminary Draft EAP has exactly listed all of these entities and so we appreciate your work. We have no further comments.	Comment noted. Note that original Section 5 has been incorporated into a broader section titled Community Outreach Program (5.2.) within the Temporary Drinking Water Provisions Section - labeled Section 5.
28	Joey Giordano - The Wine Group	Section 1.1	KRE/AID	On page 1-1, under section iii, what are we defining as the "area of contribution for a path A discharger"? Is that just the property boundary or is that intended to cover the area (movement) of potential groundwater contaminant loading from a discharger?	The phrase "area of contribution" is formally defined in the pending regulations as follows: "The portion(s) of Basin or Sub-basin where a discharge or discharges will co-mingle with the receiving water and where the presence of such discharge(s) could be detected."
29	Joey Giordano - The Wine Group	Section 6.1.1.2	KRE/AID	On page 6-2, under 6.1.1.2, the second bullet point states "Source of water to the kiosk meets safe drinking water regulations". I think this should include specifics for what that means (i.e. DDW/EPA approved standards, Title 22 standards, etc.). I think some specifics here would be beneficial.	Have provided general listing of CA Safe Drinking Water Act, CA Health & Safety Code and Titles 17 and 22 of CCR. This approach provides the overall umbrella.
30	Samantha Lopes - Farmland Management Services	Section 7.1.3	Both	Provided estimate of cost for landowner delivering bottled water to tenants: (a) 2-person household – (2) 5-gallon drums @ \$7.99/2 weeks approximately \$415.48 per year; (b) 6-person household – (8) 5-gallon drums @ \$7.99/2 weeks approximately \$1,661.92 per year	Thank you for the information

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31	Aysha Massell American Rivers	General	Turlock	Make this a community-based endeavor. For all of the work proposed, assess how members of the community can participate as workers. In other words, if there are jobs to do (i.e. outreach, kiosk design/install/maintenance, water delivery drivers) then prioritize hiring people directly impacted by water quality. This will have the benefit of getting the word out effectively, considering all potential issues and impacted parties that "outsiders" might not think of, and providing a source of income for local people. I think this approach will lead to the best outcomes for the intention of providing safe drinking water for those who need it. This EAP can explicitly recommend this approach.	Thank you for the comment. The governing body of the Management Zone will ultimately decide how to execute the work; therefore, we have not directly incorporated this recommendation. However, in a new section titled "Community Outreach" (Section 5.2) we did include "how can the community get involved" as one of the elements that could be included in outreach activities
32	Aysha Massell American Rivers	General	Turlock	Why did you choose a 10-mile diameter? Why not 5 or 15? I recommend you provide some supporting reasoning in the document to describe your thought process. (By the way, I could not find Fig 6-1)	As explained in the June stakeholder meetings, the selection of the diameter was based on an exercise to estimate the minimum number of stations needed to cover areas where nitrate is likely exceeding 10 mg/L. A 10 mile diameter was used for the Turlock MZ; 12 miles was used for the KRE/AID MZ. We started with 10 because the State Water Board's Replacement Water Settlement Agreement that applies to the area that includes the KRE/AID MZ recommend a 10 to 15 mile diameter. Figure 6-1 (now 5-1) was shared during the meeting via a PowerPoint slide; a revised version is included in revised draft EAP.
33	Aysha Massell American Rivers	Water Kiosks	Turlock	Is population variable within those circles? In other words, will one station get a lot more use than another? This would be a valuable analysis, maybe at a later stage, but crucial for kiosk design and traffic flow.	Population is expected to vary within areas encompassing a public access water location, e.g. filling station. Monitoring and EAP review/revision sections have been added to the EAP to provide a mechanism for updating the document based on what is learned through implementation, including use and potential need for additional stations.
34	Aysha Massell American Rivers	Water Kiosks	Turlock	In the budget, I don't think you included maintenance costs. This is a key component of the budget and needs to be analyzed. Include regular water testing as well as mechanical and plumbing maintenance. In other water treatment projects, unforeseen maintenance costs have shuttered multi-million dollar facilities.	An estimate was provided, but only for filling stations. This estimate has been updated in the revised EAP.
35	Aysha Massell American Rivers	Water Kiosks	Turlock	Hours of operation should include after work hours (7 pm is too early, especially during the summer) and weekends (both Saturday and Sunday). People that need to access this water may work long days (especially in the summer) and access to water needs to be convenient for them.	See response to No. 23
36	Aysha Massell American Rivers	Outreach	Turlock	Pretty obvious comment: make all outreach materials in English and Spanish at least (and assess language groups in the area to determine other translations needed). Include this in the budget.	Comment addressed

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37	Kevin Kauffman (East Turlock GSA)	Water Kiosks	Turlock	<p>Consider more practical approach to water kiosk that relies on existing private infrastructure to provide outlets for drinking water sources. Specifically, existing drinking water vendors deliver water in 2.5- and 5-gallon containers to government and business offices and retail outlets throughout the communities that are served over the Turlock Subbasin. Especially the retail outlets would serve as your pickup points and virtual Water Kiosks. The benefits far outweigh the risks and environmental impacts, i.e.:</p> <ul style="list-style-type: none"> a. A database can handle the inventory and provide the reporting back to the Steering Committee. b. The database would simply contain an address of an impacted property, and their water purchase would be free. No need for names or any other personal information. If reporting shows that an address abuses their use, further investigation can be triggered (water testing, alternative supply alternative). c. It is suggested that the retailer handle the returnable 2.5- and 5-gallon containers for the wholesaler. You could track returnable practices as well and further investigate any suspected misuse. d. This is much more cost effective than delivery, and convenient for the resident because they can access water where they normally shop for groceries, liquor, or other staples. e. Reduces the carbon footprint of having only one Water Kiosk in a 10-mile diameter; you may end up having 10 in this same area without increasing costs and less gasoline being used. f. Will likely create more local jobs in the private sector in the drinking water supply business (more trucks, drivers, water quality inspectors, bottlers, and laborers). g. Get free outreach and advertising opportunity from the trucks delivering to the retailers. h. Like the 'lottery ticket outlet' response, retailers will benefit from the resident that need their drinking water; especially the 24-hour outlets. 	<p>This concept, referred to as a "vendor-supplied water facility" has been included as an alternative to in Section 5.1.1. This section is now referred to as the "Public Access Water Program" with two options: "water filling stations" (formally water kiosks) and "vendor-supplied water facilities".</p>
38	Kevin Kauffman (East Turlock GSA)	Costs	Turlock	<p>The only other comment that I will provide is that your estimated cost seems to push the water kiosks concept. From a quick search on the web, I found that 5-gallon water service is available at about \$2 less a month that you presented. Given the quantities that we are talking about here (2,200+), I would expect an additional savings due to scale as well.</p>	<p>We are working to develop good working cost estimates for the following: (a) filling station installation and operation (formerly kiosks); (b) vendor-supplied facilities (see previous response to comment); (c) bottled water delivery under the Alternative Water Program (AWP); and (d) POU system installation and maintenance. The 2,200+ well estimate noted in the comment was reference to the pool of potential residents from which some would request participation in the AWP (just bottled water in the draft, but now also POU). Kiosks, now termed filling stations, would be available to all residents in the area, likely a number greater than 2,200 since no means testing required to allow use.</p>

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39	Bill Hudelson, Stanislaus Food Products	Alternative Water Delivery	Turlock	We should require water testing (for free) for everyone who wants to receive free water. We need the data to really understand how many wells in what areas are actually impacted, and by how much. This data will be critical in determining the long-term solutions.	We have included free water testing for anyone requesting participation in the AWP. Residents may provide their own well test results if they have already had their well tested within the last two years by a certified laboratory. We expect there will be few residents that have such data available.
40	Bill Hudelson, Stanislaus Food Products	Alternative Water Delivery	Turlock	It would seem easier to contract with bottled water companies who already have kiosks (i.e. Watermill Express, etc.) for pickup, or home delivery service (i.e. Alhambra water, etc.). Its incremental business for these companies, and they are already set up for it (although they may need more equipment). This way we are also not putting them out of business by giving away free water to anyone who shows up to a kiosk. With the volumes we are talking about, we should be able to negotiate a good deal. They probably have a way to track whose eligible (once we give them the information of who is qualified) and have a billing process (they would bill the TMZ) or can issue a card for the person to use at the kiosks, so we can get usage data by recipient as well	For now we have retained the filling station (formerly kiosk) option at this time and added another free access alternative, i.e., have a vendor supply water containers at an outlet for pickup. Home delivery service continues to be based on need and must be requested rather than being made available to all. The Management Zone Steering Committee can further look at this as needed.
41	Bill Hudelson, Stanislaus Food Products	Alternative Water Delivery	Turlock	If you assume 20 bottles/house/month at \$3.50/bottle, that's \$840/year, but could be more. If the home filtration system is \$1,200 plus \$250/year maintenance, that is a two year payback. To deal with the nitrate long-term solution is going to take years, so the home filtration system may be the cheapest option in the long run. You just have to make sure it is serviced properly. This option probably only applies to concentration levels in a certain range. I would think most elderly and disabled people would prefer this option for the convenience, since it is going to be hard for them to lift 5 gallon water bottles onto the dispenser.	A POU treatment system option has been added to the AWP. We have noted the concentration level limitation on application of this approach.
42	Bill Hudelson, Stanislaus Food Products	Alternative Water Delivery	Turlock	I think to stay in the program, every two or three years your water has to be retested (for free). A couple years of above average rainfall has the potential to dilute the nitrates, especially if you are just over the threshold. If your water tests below the threshold, you would be taken off the program. You would be eligible for retest (for free) each year thereafter, or more often if the resident wants to pay for the testing.	For now have only included a retesting component only if the first test showed levels < 10 mg/L but greater than 8 mg/L.

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43	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	Section 4 - Process to Identify Potentially Affected Residents	Turlock	This section currently refers only to the development of a mailing list. Further, the flowchart in figure 1-1 refers to an outreach packet, not an outreach process. Simply relying on mailings to advise residents of likely contamination and the availability of replacement options is wholly inadequate. This plan must provide an outreach and engagement process to ensure that impacted residents understand the risk of contamination and their options for addressing that risk. A process that combines written notices with multiple direct (door-to-door) and indirect (service providers, churches, schools, etc.) contacts would seem to us to have the best chance for success. Further, notice needs to go out every time a new kiosk is installed, not every several months. And, of course, all outreach efforts need to be bilingual in Spanish and English	A Community Outreach Program section has been created (Section 5.2) that includes various EAP outreach-related activities.. Have also included more detail regarding public notice requires.
44	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1 - Water Kiosks	Both	We assume that these kiosks will meet the requirements of and be permitted under the Sherman Food and Drug Act (HSC, DIVISION 104, Chapter 5, Article 12). If not, this EAP needs to provide detailed assurances that the machines operate and are maintained in a fashion that is protective of public health.	EAP states that the filling station must meet state and federal regulations. Implementation approach states that DDW must approve the proposed facility (design, operation, O&M, etc.). Added O&M element to annual reporting.
45	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.1 Initial Criteria to Identify Areas for Water Kiosk Development	Both	We recommend investigating the potential of installing kiosks that can be certified to remove nitrates up to a certain level. This could allow you to place some kiosks directly in impacted communities, which both provides a benefit to those impacted populations and lessens the potential for abuse of the kiosks by those whose water isn't affected by nitrate.	This recommendation has not been incorporated.at this time; will require additional research regarding viability.
46	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.1 Initial Criteria to Identify Areas for Water Kiosk Development	Both	Site Selection, number of kiosks: The Turlock basin is more heavily populated than the Alta basin, which is the model for this proposal. In addition to ensuring appropriate geographic distribution, you should consider placement weighted according to impacted population; you could consider multiple kiosks at heavily populated sites. At minimum, you should monitor periods of heaviest use (can be done remotely) and whether lines are forming at certain times (need site monitoring) as a way to signal that more kiosks are needed.	Revised EAP includes monitoring/review components to determine if additional public facilities are needed in high use areas. Added potential to conduct onsite monitoring where data show high usage at certain times (5.3.1)
47	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.1 Initial Criteria to Identify Areas for Water Kiosk Development	Both	Further, we are concerned with the number of kiosks proposed will result in too long of distances for households to travel to obtain safe drinking water.	The number of filling stations is provided for planning purposes. Sections have been added to address need to periodically review the EAP, engage the community and monitor usage of various program elements. The Management Zone can add additional locations to obtain water as needed.
48	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.2 - Final Criteria to Establish Water Kiosk Locations	Both	We recommend changing the criteria for the hours and days of operation. Kiosks should be open 24/7. Many households have family members who work long hours which may completely overlap with the currently proposed hours of the kiosks, resulting it being difficult, if not impossible for the household to be able to utilize the kiosks.	Text has been revised to state 24/7 as the goal; however, it is acknowledged that this goal may not be possible to meet in all locations.

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49	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.3 - Facility Requirements	Both	It is our belief that the kiosk must, at minimum, comply with the requirements of Article 12 of the Sherman Food and Drug Act (Health and Safety Code 111070-111198). If the coalition additionally wishes to certify a machine to remove nitrates up to a certain concentration, such approval would need to come from the Division of Drinking Water.	See response to Nos. 29 and 44.
	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.1.3 - Facility Requirements	Both	The metering to track usage should provide data on use by time of day and day of the week; further, the machines should be surveyed to understand whether wait times at any of the locations are excessive (greater than 10 minutes).	Text revised to include monitoring usage component
50	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2 Alternative Water Delivery	Both	First, we agree that multiple delivery options should be considered, depending upon household needs. Point-of-use requires greater oversight and maintenance and any agreement with an affected household should confirm that they understand that access into their homes will be needed.	POU has been added to the EAP. Residents would need to work with third-party for installation. Any maintenance requirements would be addressed initially there. Also have a 3-month call back for AWP participants to determine if system has been installed and if they understand maintenance requirements
51	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.1 Qualifications	Both	We strongly disagree with the statement that "The Management Zone reserves the right to confirm that obtaining water from a water kiosk is not a viable option for the applicant." The provision of replacement water isn't a favor being done for a fellow community member; it's an acknowledgement of the impact of dischargers on community members. The decision about how replacement water is provided should belong to the impacted resident, not the discharger.	Original language was an edited version of text in the Replacement Water Settlement Agreement applicable to the Kings/Tulare/Kaweah area. Revised language a little to state: The Management Zone may confirm the resident requesting participation in the AWP meets the following eligibility criteria (however, no personal or medical information is required to be submitted). Also revised the first eligibility criterion to include requirement that the residence requesting AWP participation is within the Management Zone.
52	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.1 Qualifications	Both	We'd like clarification of the requirement that "Applicant is not receiving or is not eligible for alternative water delivery through another existing program." Many, if not most, programs that provide for delivered water provide a minimum volume of water that may not be sufficient for a household's drinking and cooking needs. Instead of a blanket prohibition, it might be better to determine if the combination of this program and another are needed to provide sufficient safe water to a home.	This eligibility criterion has been removed; also see response to No. 16
53	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.1 Qualifications	Both	As noted at the last Turlock MZIP meeting, the identification requirement for Real ID at the Department of Motor Vehicles is both unnecessary and onerous. These are impacted residents; proof of address should be the only requirement for eligibility for this program.	Requirement removed

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54	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.2 - Implementation Approach	Both	As mentioned earlier, implementation of this program requires a robust outreach and engagement plan – that should be included in the EAP. At minimum, the best messengers to affected community members are not necessarily representatives of dischargers; the plan should include briefings for service providers and others, including community institutions and other utility providers that could include notifications and applications for alternative service in their billing.	New community outreach section added as Section 5.2
55	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.2 - Applicants to AWD Program	Both	We understand that a draft application is not yet available, but it would be good to include in this section how those applications will be made available. Electronic access may not be sufficient as many homes lack access to the internet. This should be part of the outreach and engagement plan identified earlier.	Draft stated that the application would be mailed to each resident identified (per Section process). This has been retained, but other options may still be available.
56	Jennifer Clary, Clean Water Action; Debi Ores, Community Water Center	6.1.2.2 - Applicants to AWD Program	Both	How will the volume of water delivered be determined? We appreciate that the coalition plans to follow up to ensure that the amount of water being delivered is appropriate; but does that mean that you'll increase the volume delivered if a family states that their current delivery is inadequate? How would a family contact the coalition if the volume of water delivered is not sufficient to meet their needs? What would be the process for determining whether the amount delivered is sufficient?	Costs are based on a minimum of 50 gallons/household of four people using criteria previously used in a Self-Help Enterprises project. We have stated in Section 5.1.2.1 that the 50/4 criterion is the baseline for determining how much water to deliver to a given household. A check in is included in 5.1.2.3.4 to verify the sufficiency of that volume. It will be up to the Management Zone to work with the resident to establish an alternative volume if the original delivery volume is too much or too little.
	Central Valley Water Board	General	Both	During one of the MZIP meetings last week, there were questions about what would need to be done to justify NOT using a POU type option in an EAP. There were comments about doing a “feasibility study”, along with concerns about how exhaustive that would need to be. Per discussion with Patrick, he said that something as simple as a letter from the local community group(s) saying that they prefer kiosks and/or bottled water over POU systems would suffice.	There has been general agreement in Management Zone meetings that a combination of options should be provided. Text revised to include either bottled water or POU system as an alternative to a public access water location (e.g., like a kiosk, but now termed water filling station)
57	Central Valley Water Board	Section1	Both	Requested addition of following language: This EAP is intended to be a bridge until it is superseded by the requirements established in the approved Management Zone Implementation Plan established for this Management Zone.	Text added
58	Central Valley Water Board	1.3 - Community Outreach to Develop EAP Approach	Both	This will be an important piece for both MZIP areas, especially if kiosks are going to be the primary delivery option. Public meetings should be included. Also consider how the MZ can get a letter of support from the community - kiosks will need to have their strong buy-in. Local NGOs would be a valuable partner – can help with getting the word out and garnering support.	Community Outreach Program section added as Section 5.2 which greatly expands public interaction component in June draft
59	Central Valley Water Board	Figure 1-1	Both	Work flow should include public meetings to solicit comments and to obtain buy in by the stakeholders – not just mailers.	See response to No. 58

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60	Central Valley Water Board	Section 4/6	Both	Need to include plan to have mechanism to periodic outreach. I am thinking of how often residents change by either rental turnover and/or temporary field workers	See response to No. 58
61	Central Valley Water Board	Section 6.1	KRE/AID	I think a discussion of how other sources of clean drinking water (e.g. settlement kiosks) are going to be integrated into this plan	This was noted as a footnote in the draft prepared for the KRE/AID Management Zone area
62	Central Valley Water Board	Section 6.1.1.2	Both	Need seven days a week, maybe 24/7	See response to No. 23
63	Central Valley Water Board	Section 6.1.1.4	Both	Include submit to city/county for building permits, etc.	Text added
64	Central Valley Water Board	Section 6.1.2.2 - General Public Outreach to the MZ	Both	Shouldn't it include public meetings?	See response to No. 58
65	Central Valley Water Board	Section 6.1.2.2 - Responding to Applicants for AWDP	Both	Too complicated and probably too invasive for some of the affected populations.	Section revised to address other comments (including some potential privacy issues); still likely to be considered "too complicated." Not clear how to address this concern given the nature of what is being implemented under the alternative water program. May need additional discussion
66	Central Valley Water Board	6.2 - Reporting	Both	To what end?	Section revised to incorporate more information on purpose of the reporting.
67	Mike Tietze on behalf of City of Dinuba	Section 1.2.2	KRE/AID	Currently Figure 1-2 shows areas where data are reasonably interpolated to exceed the nitrate MCL at a reasonable likelihood, and other areas where there are data gaps and the likelihood that the characterization is incorrect is much higher. The requirement is to either determine whether there are affected residents in the uncertain areas or assume based on the existing data that they are potentially affected. This should be spelled out more clearly, as well as the fact that the outline of the affected areas and identification of affected residents may change based on future data.	Figure 1-2 was not included in the draft. It will simply be a figure showing the area encompassed by the Management Zone. Section 2 has figures that show the interpolation. These figures are being updated per meeting discussions regarding interpolation issues. The outcome of this analysis coupled with the discussion on how to identify potentially affected residents will be revised in a manner that should address this comment.
68	Mike Tietze on behalf of City of Dinuba	Figure 1-1	KRE/AID	Include "potentially" within 1st box under resident identification	Figure revised
69	Mike Tietze on behalf of City of Dinuba	Section 2	KRE/AID	I think a preamble should be considered that the distribution of nitrate is broad non-point source pollution from historical sources involving a wide range of discharges from historical practices and both historical and current dischargers. Without this sounding too much like a caveat, it seems like some perspective is appropriate.	EAP is part of a larger document - Preliminary Management Zone Proposal which has not been provided as a draft yet. This type of information will be more suited for the larger document as part of the initial groundwater assessment; stay tuned.
70	Mike Tietze on behalf of City of Dinuba	Section 4	KRE/AID	2nd paragraph - Instead of, "...options within this Management Zone for obtaining non-contaminated water," state, "...options within this Management Zone for obtaining clean safe drinking water."	Text revised

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71	Mike Tietze on behalf of City of Dinuba	Section 5	KRE/AID	Would be good to provide [Non-dischargers] informational brochures regarding the program and how folks can get clean drinking water. A workshop informing local agencies would also be helpful.	A new section has been created to address collaboration with non-dischargers. A workshop included as a potential outcome.
72	Mike Tietze on behalf of City of Dinuba	Section 6.1.1	KRE/AID	Missing a permitting step here: possibly CUP, CEQA IS/ND or IS/MND (I don't think this is emergency regulation?), and building permit.	Added text regarding building permits and "other necessary approvals"
73	Mike Tietze on behalf of City of Dinuba	Section 6.1.2	KRE/AID	Regarding alternatives other than bottled water: I think per discussion should list alternatives and development of criteria to determine which is the right path.	EAP includes two options for alternative water: bottled water and POU treatment systems. Other potential options, e.g., Point of Entry, do not appear to be viable. Community outreach and adaptive management elements included that will provide opportunity for other options to be considered in the future.
74	Mike Tietze on behalf of City of Dinuba	Section 6.1.2.2 - General Public Outreach to the MZ	KRE/AID	Regarding "public notice may be accomplished..." - Suggest being specific about what will be done.	Section revised considerable - see other related comments above
75	Melissa Thorne	6.1	Both	Recommend adding: "This water is only to be provided for drinking water/cooking and for no other purpose (e.g., showering/bathing, irrigation)."	Incorporated
76	Melissa Thorne	6.1.2	Both	Regarding Alternative Water Delivery Program, "Can people just buy bottled water and get reimbursed? That might be another option."	This has not been incorporated at this time, but could be discussed by Management Zone steering committee