

APPENDIX N
RECOMMENDATIONS HANDOUT

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.A. Ensure that the specifics regarding existing infrastructure are known. The location, size, condition, and depth of private well or septic system facilities should be known by the property owner and maintained in a database by the county [See Recommendation 13.7.1.C].
Lead Entity	The owner of a private well or septic system
Why	If a property owner has knowledge of the infrastructure that exists on his property, it will help to more effectively and efficiently address problems (e.g. well goes dry or septic system fails) when they arise, and may help to understand when a problem may be coming so it can be addressed before a failure occurs.
How	Obtain information from the well driller, pump contractor, or contractor who is installing the septic system. Confirm that the well driller or contractor has obtained appropriate permits from the county and that details of the construction are submitted to the county to maintain in their database. For existing facilities, information should be available at the county.
When	Anytime that a new well is drilled, septic system installed, or when any modifications to an existing well or septic system are made (for example, deepening a well). This information should also be requested when purchasing a property, either from the seller or the County. If the information is not available, it would be advisable to have a contractor inspect these facilities and produce the necessary information so that the buyer knows what he is purchasing.
Funding	Funding: No funding source is necessary. This is a matter of maintaining records of what is on a landowner's property.

¹ The recommendations contained herein are provided for general consideration by the various entities identified. The information contained herein is not intended to be and should not be construed as legal advice. Readers should seek the advice of an attorney when confronted with legal issues, and an attorney should perform an independent evaluation of the issues addressed in these materials.

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Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.B. Ensure that specifics regarding existing water or wastewater system infrastructure are known. The location, size, condition, and capacity of facilities should be known and records maintained by the community services management personnel.
Lead Entity	Water or wastewater system owner
Why	When the owner of infrastructure has information regarding the location, size, depth, materials, age, capacity, and condition of the facilities, the owner will be able to a) effectively respond to problems with the facilities, and b) know the capability of the existing infrastructure to meet existing and proposed demands. Knowledge of the existing infrastructure is critical when planning expansions or upgrades to said infrastructure. This information is also useful for LAFCOs conducting Municipal Service Reviews for publicly-owned systems and mutual water companies, and should be integrated into those reports to the extent appropriate.
How	Records of existing infrastructure should be available at the office of the local service provider. If records of existing infrastructure are not readily available, the county may have information regarding infrastructure within existing rights of way. Another source of information may be the engineer of record for the respective improvements. The RWQCB and SWRCB Division of Drinking Water may also have information associated with wastewater treatment and water supply infrastructure, respectively. If no records are available, a survey of ground surface infrastructure (manhole lids, cleanouts, valves, hydrants, meters, wells) may provide limited information regarding the location of infrastructure.
When	Improvement plans are required to be approved by the local service provider prior to construction. Copies of the “as built” plans are to be maintained by the local service provider upon completion of construction. Records of repairs or modifications to the existing infrastructure are to be maintained by the local service provider.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.

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Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.C. Conduct a review of fiscal resources annually and determine the necessary levels of reserves for replacement and maintenance of all infrastructure. Determine an appropriate time frame and funding plan to achieve the necessary levels of reserves.
Lead Entity	Water or wastewater system owner
Why	The owner of the water or wastewater system has the responsibility to operate and maintain the facilities. Operation and maintenance responsibilities include payment for power, chemicals, labor, insurance, communications, maintenance equipment, regular maintenance of the facilities, response to failures or damage of the facilities, and replacement of facilities that have reached the end of their respective useful life. Reserves are necessary to be able to respond to catastrophic failures or emergencies (ie. failure of a well pump). If the fiscal resources are not sufficient to satisfy the basic demands of sustaining the facilities, adjustments to the monthly rates are necessary.
How	Public water and sewer systems are subject to annual audits of fiscal resources and procedures. In addition, the owners of water and sewer systems should define an operations budget for all required expenditures and necessary savings for replacement/repair of infrastructure. Private water and sewer systems should also define an operations budget for all required expenditures.
When	Review and adjustments to fiscal resources should be an on-going activity. However, the owner of the facilities should define a budget annually. Typical fiscal year cycles for public systems begin on July 1 of each year. The activity of preparing the budget for the next fiscal year would typically include a review of the fiscal performance of the previous year so that appropriate adjustments may be included in the upcoming budget.
Funding	Review of fiscal resources and performance of the water or sewer system is funded through the operations funds of the owner of the facilities.

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13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.D. Consider adding requirement for more frequent or comprehensive and standardized assessment of TMF capacity for local water and wastewater providers, as well as updating regulatory and permit requirements for water and wastewater systems to clarify that it must meet TMF requirements to maintain permit to operate.
Lead Entity	State Agencies and Local Primacy Agencies
Why	There is a lack of comprehensive information and standardized indicators of water and wastewater providers to assess TMF capacity. Additionally, Federal and state statute enables the SWRCB Division of Drinking Water to require a demonstration of TMF capacity only (1) on formation of a new public water system; (2) on change of ownership of a public water system; or (3) when state funding is provided to a public water system through one of its three funding sources. SWRCB can recommend TMF assessments at other times and has been able to require specific TMF demonstrations through some enforcement actions, however a clearer requirement that systems must meet TMF requirements and a standardized assessment would drastically improve the ability to enforce these requirements and ensure more universal compliance. Also, note that wastewater system permittees are not required to provide a demonstration of TMF capacity under the SWRCB permits so this should be added to permits. This information would also be useful for LAFCos conducting municipal services reviews and should be integrated into that process, as available and appropriate.
How	The State Water Board should update its permitting guidelines and initiate rule making processes as appropriate to clarify these requirements and provide standardized assessments and indicators. These indicators could then be applied through the annual inspection process and reported to the regulating entity annually through the sanitary assessments. Permit requirements for individual permits could be added as they are renewed, if a general rulemaking is not feasible. Resources and enforcement could be used in tandem to bring systems into compliance. It is important that enforcement not be used to penalize a system that is in-capable of correcting the problem without providing assistance to build TMF capacity. Assistance could be in the form of training, technical assistance, and funding assistance to assess joint solutions or supporting forms of consolidation to build TMF capacity.
When	The sooner this is conducted, the easier it will be to ensure all systems meet TMF requirements and target resources and enforcement to those systems that are unable or unwilling to comply.
Funding	Funding at the State level would be needed to enact new guidance and undertake rulemaking and added time for annual assessments.

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Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.A. Attend training programs and encourage or require other staff and board members to attend training programs.
Lead Entity	Water or wastewater system owner
Why	Training is appropriate for everyone involved in the management of a water or wastewater system, regardless of size. Especially in small or isolated communities, boards and staff may get stuck in ruts or patterns of management that persist over many years. Minimal outside intervention and a limited pool of board/staff candidates combine to create an insular environment that may be resistant to change. Training brings in new perspectives and new approaches and can revitalize institutions that lack forward motion.
How	<p>The water or wastewater system owner or manager should convey the importance of attending trainings and what it can mean for the community.</p> <ul style="list-style-type: none"> Attend trainings provided by Rural Community Assistance Corporation (RCAC) in coordination with SWRCB. RCAC provides free statewide training throughout the year at locations around California under a contract with SWRCB. Local SWRCB Division of Drinking Water District Offices can request specific training topics be offered in their area, if information is available indicating an interest in that topic. The Division of Drinking Water encourages local water providers and assistance organizations to review the RCAC training topics and provide input to the local District Office on desired local training. The RCAC training program can be viewed at http://www.rcac.org/event/1114. Operator training – Participate in existing local entities such as California Water Environment Association (CWEA) and California Rural Water Association (CRWA). Board and leadership training – Participate in board training opportunities such as leadership training and ethics training. SWRCB (Division of Drinking Water) in coordination with Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) will be providing targeted board training for several communities in the Study Area; there is potential for this program to be expanded and continued to other communities. Network with other communities, share resources and information, and provide informal training to one another. Utilize web portals from state agencies and counties, as well as funding fairs, to access information on training programs, funding opportunities, and other available resources.
When	Managers, board members, and operators should attend appropriate training programs annually, at minimum.
Funding	The source of funding is the water or sewer fund of the local service provider. Technical assistance funding

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	from State agencies may be available to supplement these costs in some cases (i.e. operator certification reimbursement programs) or bring specific trainings to local areas.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.B Create a single local point of contact for local service providers and private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges.
Lead Entity	Counties and/or district offices of SWRCB could develop a single point of contact. Local service providers and private well and septic system owners can utilize existing resources at the county and State levels.
Why	Currently, it is difficult for individuals and small DACs to navigate existing requirements, resources, and opportunities. A single point of contact would allow communities or private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges more efficiently. Additionally, a single point of contact could help coordinate more effective access for other public, private and non-profit agencies (such as LAFCo, private water companies or contractors, and assistance providers) trying to provide support to address these issues. Some counties, and the SWRCB, RWQCB, and other agency websites provide forms of an information clearinghouse that are good resources for information on many water and wastewater related programs, requirements, and resources. A point of contact at the local level would help water and wastewater service providers or private well owners navigate and identify existing resources to get information related to their system issues.
How	Designating a staff person as the primary single point of contact in each local county or each district office of SWRCB would enable local water and wastewater providers or private well owners to identify appropriate websites, resources, and other information from the County Environmental Health, SWRCB, RWQCB, or other websites to access information, answer questions, obtain necessary forms, learn about training and funding opportunities, and stay aware of new regulations. The point of contact could also have recommendations on more specific contact persons on any particular topic or program that could help provide more detailed information and assistance.
When	Ongoing.
Funding	Creation of a single point of contact would likely need to be included in county or state agency staff/operating budgets. Some funding may be able to be targeted to support this through capacity building or technical assistance set asides of the SRFs. Funding for this resource could also be developed through permit fees for local water systems, domestic well owners, septic owners, and wastewater systems as part of the support services for administration of the drinking water and/or wastewater regulatory permitting programs.

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13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.C Consider providing regular Special District Board training opportunities, including leadership and ethics training. General legal topics may be covered, but the local service provider should seek specific legal advice from its own legal counsel.
Lead Entity	Counties
Why	Boards, in particular, may develop habits over time that may or may not be compatible with special district law. Periodic training on ethics and legal issues, as well as a place to go to ask basic questions, can help boards avoid inadvertent missteps. However, special district law can be complex and difficult for communities to comprehend, and therefore specific legal advice should be provided by an attorney hired by the water or wastewater system provider.
How	Holding periodic trainings in the physical context of government buildings can remind participants of the larger system in which they function as local government representatives. Tulare County has sponsored a series of ongoing “Government 101” trainings that have been successful. They are held on a weekday evening at the County administrative building, and dinner is provided.
When	Trainings should be held one to two times per year. Weekday evenings may work best.
Funding	Local water or wastewater service providers and counties.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.D Continue to convene a DAC focused stakeholder group for the Tulare Lake Basin, and expand outreach and engagement to further enhance DAC, County, IRWM, and other local stakeholder engagement and participation. Expanded outreach and engagement efforts should educate local board members, operators, and residents on local water and wastewater challenges and priority issues, as well as resources that are available, including findings and recommendations developed through this Study and existing resources from technical assistance providers. Continuation of stakeholder meetings should occur at least quarterly to track progress on the recommendations of this Study and provide updates on new program, challenges, resources or opportunities.
Lead Entity	The stakeholders that have participated in the Tulare Lake Basin Disadvantaged Community Water Study (particularly those in the SOAC), including state agencies, counties, IRWMs, DAC representatives, and non-profit organizations.
Why	Local DAC stakeholders have found it to be valuable to come together on a regular basis to discuss local DAC issues, opportunities and programs, and reflect on recommendations through this multi-year Study

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	process. The SOAC recommended that the group continue to meet quarterly to track progress on the recommendations of this Study, as well as engage more extensive DAC stakeholders through a local follow-up outreach and engagement campaign. Expanded outreach and engagement would help enable local systems to utilize tools and lessons learned through this Study, as well as other existing resources, and develop appropriate solutions. This would help ensure that this Study is more than just a report, but will actually be accessed by communities and help to develop long-term sustainable solutions to local water and wastewater challenges.
How	This would be best accomplished through continuation of the SOAC process through a coordinated effort with all the stakeholders, counties, organizations and agencies that have participated in the Tulare Lake Basin Disadvantaged Community Water Study. Some funding would be needed to 1) have a coordinating entity continue to facilitate these groups and invite representatives to participate in local stakeholder meetings, and 2) support planning and implementation of expanded outreach and engagement throughout the Basin. Participation from local disadvantaged communities, counties, non-profits and funding agencies directly in the outreach and engagement would help make these efforts more effective by lending credibility, resources, and reliability through personal connections from communities in similar situations.
When	Following completion of this Study, meet quarterly and identify a plan and funding to expand outreach and engagement to additional stakeholders in the Basin.
Funding	Counties could fund continuation of quarterly meetings of the SOAC. Additionally, the group could approach state or federal funding agencies about funding for a coordinating entity (a non-profit or local agency) to coordinate an expanded outreach, education, and engagement campaign to follow up after this Study has ended. Local non-profits could approach private and public funding sources to support these efforts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.E Target existing technical assistance training programs to specific communities who have shown a need and interest, to focus on their needs and provide locally available and specialized training programs.
Lead Entity	State Agencies and technical assistance providers (RCAC, SHE, etc.)
Why	Local, targeted trainings are more effective because they are more accessible to rural communities, and can be tailored to meet the unique needs identified by water and wastewater system representatives. There is an additional benefit to bringing local water and wastewater system representatives together so they can network and learn from each other.
How	SWRCB (Division of Drinking Water) in coordination with Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) will be providing targeted board training for several communities in the Study Area. This initial effort can inform how a program can be expanded, improved and continued to other

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	targeted groups of communities. SWRCB staff and technical assistance providers should work together to identify target communities. A local venue would be identified and invitations extended to water system representatives, including board, staff and operators.
When	Quarterly or biannually, in different locations. Follow-up trainings could be scheduled as needed, depending on response.
Funding	State Water Resources Control Board technical assistance funding through the SRF set aside, or current or future bond funding.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.F Improve the operator certification process by providing more frequent testing, and offering certification tests in more locations.
Lead Entity	SWRCB Operator Certification Programs
Why	Operator certification is challenging for people in remote areas and for those without English language skills. Training opportunities are limited, testing sites are distant, and the exams are offered only in English. Sometimes valued staff members are lost because they cannot achieve a basic distribution operator certification, despite adequate skills and long experience. Particularly for lower-level certifications, such as water distribution or treatment certification level D-1 or T-1, or wastewater operator Grade I, the need for accessibility and affordability of certification programs may outweigh other precautions. Currently, drinking water treatment and distribution system operator exams are only offered in eight locations throughout the State, including one location (Fresno) within the Tulare Lake Basin Study Area. Each distribution and treatment certification test is offered two times per year. Similarly, wastewater treatment plant operator certification exams are currently held two times per year, with only one exam location in the Tulare Lake Basin (Fresno).
How	Provide opportunities for examinations in more locations, on a more frequent basis. Consider providing exams in at least three locations throughout the Tulare Lake Basin (for example, Fresno, Visalia, and Bakersfield). Also consider remote testing that could be done online, possibly from local libraries. Consider making examinations available in Spanish or other dominant languages, at least for lower-level certifications that do not require English literacy to perform relevant duties. Note that regulatory documents are in English only, and therefore this may not be a feasible consideration.
When	Exams should be offered quarterly.
Funding	SWRCB Operator Certification Programs.

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Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.G Consider developing operator training programs at local community colleges to address the lack of licensed water and wastewater operators.
Lead Entity	Local Community Colleges (State Center Community College District, Sequoias Community College District, Kern Community College District, West Hills College, or others)
Why	<p>There is a lack of properly certified operators available to operate water and wastewater systems throughout the Study Area. With increasing regulations necessitating the need for more and higher grade treatment facilities, this will only become more of an issue if operator training programs do not become a higher priority.</p> <p>Training programs have been attempted at local community colleges, however, they have had trouble filling seats, and so these programs have not been sustainable. It may require some outreach efforts to encourage students to pursue this career path, but local job opportunities and compensation would need to support that.</p>
How	Community college districts should discuss and evaluate the need for providing operator training programs. If such programs are developed, the community college district should outreach to youth to inform them of the benefits of these training programs and the need for water and wastewater system operators. It is recommended that an evaluation be conducted of the magnitude of operator needs and relative compensation levels for those who complete such training programs, so that the outreach efforts can be properly informed. These discussions should involve CWEA and their experience related to operator training needs.
When	Ongoing.
Funding	Community college districts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.A Even outside of larger infrastructure project development processes, alternatives such as sharing common resources, forming joint governmental agencies, or other forms of consolidation should be evaluated to determine if O&M costs could be reduced or TMF capacity improved.
Lead Entity	Local water and wastewater providers and entities developing applications for improvements to disadvantaged community water and wastewater systems should examine these alternatives. Also, state and federal funding agencies should support examination of these alternatives within the scope of work of public funding agreements
Why	For some areas, a sustainable and affordable solution could be made possible through some form of

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	regional or shared solution that would allow communities to share ownership and operation of water infrastructure as well as create a sizable enough funding base of rate payers to have a sufficient economy of scale for operations and maintenance. Local agencies should examine the full range of alternatives and evaluate how costs may be able to be reduced through shared solutions in order to address immediate and long-term operations and maintenance funding and TMF capacity challenges.
How	Water and wastewater providers should ask local district engineers to examine these alternatives, and should seek out contractors and engineers that have experience with this kind of analysis and have proven experience in successfully developing these kinds of solutions. A third party entity, such as a county, non-profit or other group could also develop an analysis of alternatives with a number of communities jointly. However, in all cases analysis should be transparent and community-driven, allowing the community to understand and provide input into the pros and cons and real O&M costs of alternatives.
When	It is easiest to do this as part of funding applications for feasibility studies when solutions are being developed because there are funding sources available to cover the costs of providing these types of analysis. However, similar analysis should be discussed with local district engineers outside of larger capital project development as well.
Funding	The primary source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service. Sources of external funding for this may include the new pre-planning entity formation set aside as part of the SDWSRF. However, all feasibility study planning funding from the state or federal funding sources should include this kind of analysis. In addition, IRWM funding could support this, as well as sustainable community planning funding grants.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.B Establish local DAC coordinator(s) for the Tulare Lake Basin to support DAC outreach, collect updated information on DAC water and wastewater needs, help link communities to funding sources, training opportunities, and technical assistance resources, and help integrate DACs into planning processes, including IRWMPs. ² Specific responsibilities could include some or all of the following:

² This recommendation is intended to be consistent with recommendations related to the need for DAC coordinators and DAC representation provided in both the Kings Basin DAC Study and the Governor's Drinking Water Stakeholder Group's Report on New and Expanded Funding Sources.

Kings Basin DAC Study: http://www.krcd.org/pdf_ukbirwma/Kings%20Basin%20DAC%20Final%20Report.pdf

Governor's Drinking Water Stakeholder Group Report:

http://www.swrcb.ca.gov/water_issues/programs/groundwater/docs/stakeholders/8132013_2_final_rep_new_expanded_funding.pdf

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	<ul style="list-style-type: none">○ Provide outreach, communication, and capacity development with local disadvantaged communities in unincorporated areas.○ Collect updated information on DAC water and wastewater needs and collect new information to close data gaps (i.e., TMF capacity needs, source of water where unknown in database, water supply needs, etc.).○ Provide technical assistance to DAC water and wastewater entities who are trying to integrate their needs within IRWM and other local and regional planning efforts.○ Work with individual DACs to determine appropriate funding programs.○ Provide information to DACs on available training and technical assistance providers and resources, including fundraising, grant writing, fiscal management, and project management assistance.○ Link local DACs to experts (including NGOs and private contractors) that can effectively facilitate and support locally-developed, voluntary consolidation or other forms of shared solutions and regional planning efforts by providing expertise for studies or analysis, stakeholder facilitation, as well as legal and LAFCo process assistance, with the goal of advancing the most sustainable and affordable solutions.
Lead Entity	Existing local non-profits organizations or technical assistance providers could provide DAC coordination and outreach activities. State agencies, local counties, and IRWMs could also provide support for this position.
Why	In order to effectively and efficiently plan and implement water and wastewater solutions in the Tulare Lake Basin, where there are a large number of disadvantaged communities in unincorporated areas without safe drinking water and wastewater services, targeted assistance is needed to support coordination of DACs. Without this kind of coordination, disadvantaged communities in unincorporated areas will likely remain isolated, disjointed, and often unorganized without structural capacity and an ability to implement cost effective drinking water and wastewater solutions and effectively participate in planning or regional project development processes.
How	Given the hundreds of DACs in the TLB, ideally coordinators could be funded for each county and/or for each watershed within the TLB. Efforts to coordinate DACs locally could be organized through local DAC associations or tasks forces, although a DAC coordinator would likely be (at least initially) housed within an existing local non-profit organization. State and federal funding agencies could consider setting aside specific funding for local DAC coordinators as part of state funding program outreach and technical assistance budgets. It is noted that this would be a voluntary program for those communities interested in utilizing the services of a DAC coordinator for the potential services described above. Counties, local IRWMs and local non-profit organizations should also consider ways to provide these

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	services or support these efforts. Local counties and IRWM groups could support this through official recognition of DAC coordinators within planning and project development processes, providing DAC update items within relevant meeting agendas, and deliberate coordination with staff and decision-making bodies with explicit intent to integrate DAC issues and support effective DAC outreach and engagement.
When	Ongoing.
Funding	State funding could be targeted through existing technical assistance set-asides, such as the SRF, through existing funding program outreach and assistance budgets, or through new bonds or funding sources. For DACs directly represented by a coordinator, the local water or wastewater provider could provide funding to support this position. Additionally, non-profit organizations could seek private sources of funding to support these activities, at least to get processes started.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.C Support the evaluation and development of a regional entity or entities to provide regional operations, management, or other services in regions that are interested in exploring such services. Efforts should begin with a small region or group of interested communities to show interest and success before considering scaling-up to any type of larger regional entity. Regional DAC operations or management services may include some or all of the following: 1) provide the organization, structure, and capacity needed to support development and funding of sustainable and affordable shared solutions, particularly for communities not currently served by centralized water and wastewater providers, 2) provide direct management and operations of existing DAC water systems when needed or requested, and 3) directly represent participating DACs in IRWM groups or other forums, when appropriate.
Lead Entity	Counties, non-profit organizations, or other regional entity (including one or more special districts). If a special district structure is used, LAFCOs would need to support consolidation or creation of the new regional special district serving areas that may or may not be physically connected. This may also necessitate legislative action.
Why	Many disadvantage communities lack sufficient organization, capacity, and representation structure required to develop, implement and maintain drinking water and wastewater systems. This is particularly true of DACs without an existing centralized public water system or wastewater system, as well as systems that go into receivership, or are just not sustainable due to inadequate technical, managerial, and financial capabilities. Some DACs within smaller regions of a county have started to consider options to create different forms of unified regional entities to provide water and/or wastewater services (e.g. Northern Tulare County, Alpaugh-Allensworth area, and communities in western Fresno County). While counties and other existing water and wastewater agencies are able to support some of these functions on a case by case basis, counties and

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	<p>existing providers are often reluctant to take on additional responsibilities for troubled DAC systems. There is a need and interest in some areas for an entity or entities that can have the focused capacity to regionally or jointly operate systems when needed (e.g., receivership) and/or requested. Additionally, where regional entities are established, they can directly represent those DACs within local IRWMs and facilitate enabling more in-depth integration of DAC needs and projects within planning efforts and regional project development.</p>
How	<p>It is most feasible to begin with a smaller group of DACs voluntarily working together to establish a regional operating entity that can perform some of these functions to test such a model, show success, and build the framework and trust in such an entity. Additionally, rather than taking on all planning, project development, operation and representation functions at once, an entity could start by taking on one or two of these functions, such as operating existing entities as a receiver or taking on operations of zones of benefits from a county that no longer wants to directly provide that role. Areas to begin initial efforts, where DACs have already expressed interest in exploring a regional operation model, include the South Tulare County forum or the Northern Tulare County regional water system study efforts.</p> <p>Such an entity or organization could be housed in an existing agency or local government or non-profit organization, or be a new independent entity. LAFCOs must be involved in development of these concepts and should support consideration for allowing regional entities that may or may not be geographically contiguous or physically connected.</p>
When	<p>Some regions are already pursuing these models and further development should be supported following the completion of this Study.</p>
Funding	<p>The funding to start up a new entity to provide regional operations services may take some support by state funding sources. However, the funding to maintain this type of entity and fund the operations and maintenance of the entity beyond a start-up phase would need to rely entirely on funding from local rate payers and other revenues generated by the local provider. Therefore, it is important that any start up phase include developing the ability to collect fees and a sufficient economy of scale to fully sustain these services. State funding sources to support piloting small regional entities could include the Clean Up and Abatement Account, SRF Pre-Planning and Legal Entity, and IRWM funding. Future bonds or budget allocations may be able to provide funding for these activities. Additionally, pilot project funding could be pursued from private foundation sources, USEPA, or USDA for purposes tailored to meet the criteria of those funding sources. In other parts of the country, local governments, states and the federal government have funded part or all of start-up and implementation of regional water entities.</p>

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.A Project alternatives should be analyzed to minimize ongoing costs and secure TMF capacity. If O&M costs cannot be supported or TMF capacity challenges are not adequately addressed, other alternatives should be pursued.
Lead Entity	Any DAC considering making any improvements to their water or wastewater system.
Why	O&M costs have to be borne by the users in the community. Depending on the median household income in the community, the utility rate increase may adversely impact the users. State agencies have implemented requirements within their funding programs for full evaluation of the operation and maintenance lifecycle costs for a selected project, along with a water rate study to identify what impact the project has on the cost of water for that community. If the projected water rate is deemed to be unaffordable, they will not (and should not) fund the selected project.
How	Solutions should be analyzed to minimize ongoing costs. If O&M costs of a project cannot be supported, other alternatives should be pursued. Developing an O&M plan that includes the types of ongoing O&M costs needed, O&M servicing and parts replacement schedule, and amount needed for O&M fund reserve can help the community plan ahead to address covering O&M adequately. If O&M costs cannot be supported by the community, it may be that the system is not viable (too small, too remote, insufficient water supply or water quality, etc.) and should be discontinued.
When	Whenever a DAC is evaluating potential improvements to their water or wastewater system.
Funding	Local Funding from the water or sewer fund of the local service provider should support O&M costs. The source of revenues is the water or sewer charge for service. Funding agencies fund an analysis of alternatives conducted in a feasibility study, and/or during the project planning phase.

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.B Even outside of larger infrastructure project development processes, alternatives such as sharing common resources, forming joint governmental agencies, or other forms of consolidation should be evaluated to determine if O&M costs could be reduced or TMF capacity improved. [See Recommendation 13.1.3.A for full description]
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.C Consider providing increased funding for capital improvements for water (or wastewater) related projects when it would allow for reduced O&M costs over the long term. For example, construction of dual water systems for DACs with poor distribution systems or high non-potable water demand.
Lead Entity	State and Federal funding agencies
Why	Grant funding for DACs is currently capped at \$5 million for capital costs (for Prop 84 funding). O&M costs must be paid by the system customers. There may be instances when a capital cost greater than \$5 million may provide a DAC with less O&M costs compared to an improvement with a capital cost less than \$5 million. For example, a dual water system would allow the DAC to treat a smaller volume of potable water resulting in lower on going O&M costs. Other funding sources such as SRF and USDA are available, which typically have loan components.
How	Consider allowing DACs to obtain grant funding for capital costs greater than \$5 million if the higher capital costs solution will lower ongoing O&M costs. An evaluation to determine appropriate levels of funding and qualifications would need to be done prior to increasing current funding limits.
When	When considering new funding programs or funding program updates.
Funding	Local funds, State legislature, SWRCB

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.D Support the development and implementation of water conservation policies/measures by providing incentives and technical assistance to DACs and promoting the use of water and energy efficient equipment upgrades, such as energy-efficient or solar powered pumps.
Lead Entity	State Agencies
Why	Water systems that implement water conservation techniques and bill their customers based on water used will use less water. Less water used will mean less water needing treatment that will result in lower O&M costs. Energy efficient upgrades to pumps and other large electrical consumption equipment will lower electrical costs to the water system.
How	Provide incentives for water systems to install water meters and implement water conservation policies, and measure their effectiveness. Energy companies can provide incentives in the manner of rebates or funding for water systems to install more energy efficient equipment.
When	Now for water conservation measures. When existing pumps or electrical equipment is due for replacement for energy efficient upgrades.
Funding	Local funding, State legislature, SWRCB/RWQCB, energy companies
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.A Evaluate water and sewer rates at least every three to five years and when any major improvements are constructed, and modify as appropriate to achieve the necessary financial resources for annual operations and reserves for the next five year period. This should include development of a rate study to determine appropriate reserves and rate increases, and follow Prop 218 requirements. Typically the Prop 218 hearing will address increases for several years and, if necessary, will include increases for subsequent years at a set frequency.
Lead Entity	Local water and/or wastewater providers
Why	Many community water or wastewater systems do not bring in enough revenue to offset the system expenses. This is often due to rates that were set many years ago and rarely if ever increased. Increases in regulatory requirements, system age, changes in the economy (inflation), as well as other factors necessitate an increase in rates at least every five years, if not more frequently. Additionally, any changes to the system that impact the operation and maintenance costs, should be reflected in the rates. Delaying

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	adequate cost increases means O&M costs are not addressed, needed repairs are not made, and systems are not planning to address water capacity and/or water quality issues.
How	Develop a rate study determine appropriate reserves and rate increases, and follow Proposition 218 requirements. This will likely require the services of an engineer or other technical service provider. The California League of Cities put out a Proposition 218 Implementation guide in 2007. It may be available from the League at 1400 K St., 4 th Floor, Sacramento, CA 95814.
When	At minimum, every five years, and when any major improvements are constructed or other changes to the system that impact O&M costs.
Funding	Local service provider
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.B Each local service provider (water or wastewater) should develop a single rate structure (which may include different categories, such as residential, commercial, and industrial), and no exceptions should be made to that structure. A tiered rate structure should be developed with appropriate base rates and water usage rates to encourage conservation while ensuring sufficient revenue. Certain discounts (such as senior citizen discounts) may be employed, as long as they are consistently used and part of the written rate structure.
Lead Entity	The water or wastewater system owner.
Why	The rate structures for many communities have not been updated or reviewed for many years. In addition, there are many occasions that have been discovered where special undocumented rates had been established for specific properties many years ago. There have been other instances of properties receiving service with no requirement to pay for said services.
How	A review of the fiscal requirements to operate the water or wastewater system should be conducted annually by the owner. An equitable distribution of charges necessary to sustain the water or wastewater system is necessary so that all customers are treated in a consistent manner. The owner of the system may need to contract for the services of legal counsel and a rate structure consultant to determine an appropriate rate structure.
When	The basis for charging for water or wastewater service should be consistent and sufficient to meet system demands at all times.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	<p>13.2.2.C Seek funding to install or replace water meters. The replacement meters should be capable of being read remotely (if the system size or agreements with neighboring systems support it) to reduce labor costs.</p> <ul style="list-style-type: none">○ Consider installing same meters as neighboring community(ies) so that meter reading and billing systems can be shared.○ Develop a tiered rate structure with appropriate base rates and water usage rates to encourage conservation while ensuring sufficient revenue.
Lead Entity	Local government boards, technical assistance providers/consultants
Why	Installation of water meters is a basic and very effective method of water conservation. Metering leads to natural behavioral changes by water consumers because meters tie water use directly to household finances. Reduction in water use results in lower operating and maintenance expenses to the utility. Use of water meters also provokes the development and use of tiered rate structures, which are an excellent tool for improving overall utility finances and distributing costs over customers with different use patterns. Additionally, installing compatible meters in several locations in a given region can provide a very good opportunity for communities to enter into contractual agreements to share equipment, software, billing functions and staffing positions.
How	Consult with a technical service provider and/or engineering consultant to determine the available funding opportunities. Water meter installation could be considered as part of a larger infrastructure project, or as a separate project.
When	Immediate and ongoing.
Funding	A source of funding is the water or sewer fund of the local service provider. State agencies could redefine Category H projects (as defined by the State Revolving Fund Project Ranking Criteria) to include replacement metering projects, including meter reading equipment and necessary software. DWR could fund an ongoing Water Use Efficiency program (currently the program is funded only periodically) in which metering and re-metering projects are eligible.

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.D Establish appropriate connection fees for any new connections to support the capital improvements required to provide service to those new connections.
Lead Entity	The water or wastewater system owner.
Why	The water or wastewater systems are faced with capital expenditures necessary to satisfy infrastructure demands resulting from growth of the population served and from needs of the existing population (changes to regulatory requirements and the need to replace existing facilities). Connection fees are imposed as a means to collect funds from new developments to be served by the water or wastewater system. The existing water or wastewater system should not be required to assume additional capital improvement burdens imposed by new development demands upon the systems.
How	The water or wastewater system owner may conduct a review of the existing infrastructure and its relative ability to serve the existing and future demands. Capital improvements necessary to meet the demands of existing and future populations of the service area may be described and the relative capital cost of the improvements may be estimated. The relative benefit of the capital improvements for the existing and future population may be estimated. Based on the information described above, the relative connection fee per new connection may be estimated. The owner of the water or wastewater system would review the information and determine the appropriate connection fee. Proposition 218 is not applicable when establishing new connection fees. However, the fees must reasonably relate to the costs incurred by the service provider.
When	If there is not a connection fee established for the system, the owner should prepare the supporting documents and establish connection fees as soon as possible. If connection fees are established, the basis for the fees, and the fees themselves, should be reviewed at a frequency of at least every few years.
Funding	The source of funding is the water or sewer capital improvement fund of the local service provider. The source of revenues is from developers of new residential, commercial, and industrial service connections.

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.E Consider establishing a transitional funding program to assist with O&M costs on a temporary basis.
Lead Entity	State agencies and the legislature
Why	At the state level there is a need for a targeted and coordinated funding program with the clear goal of transitioning small disadvantaged communities in unincorporated areas without safe drinking water (including those communities with and without existing public water systems) to achieve, self-sustaining, affordable drinking water systems.
How	<p>This newly targeted program should specifically include funding for the following:</p> <ul style="list-style-type: none">✓ Technical Assistance for both 1) project application and project operation and management (currently eligible under SWRCB Division of Drinking Water funding but not DWR IRWM funding), and 2) leadership and capacity training;✓ A pooled capital reserve fund, which can cover both short-term financing costs and help lower O&M costs; and✓ Some O&M subsidies for an initial period of time until long-term solutions are implemented and self-sustaining. <p>As a “transitional” program, the associated funding should be limited to supporting the transition of existing disadvantaged communities into self-sustaining systems that can achieve compliance with the applicable regulatory requirements and ensure affordable rates. The program should not be a long-term, on-going financial support mechanism. As such, a disadvantaged community’s participation in a transitional funding program should have conditions and incentives to ensure it is meeting certain objectives and milestones in a timely manner. In particular, at minimum state agencies should require and provide TMF training and improvements as a condition of receiving this O&M funding.</p>
When	This should be considered as part of the IUP process, state budget and legislative process, and within the creation or appropriation of new funding sources, including the new water bond.
Funding	Such an effort would need to include targeting significant amounts of existing funding sources, and will need new and additional funding sources to adequately address the needs and gaps identified above. The modified Water Bond should include significant funding for this effort. It may be possible to create a set aside in the SRF Intended Use Plan (IUP) for some or all of this purpose, as well as utilizing the Clean Up and Abatement Account and IRWMPs for at least some of these purposes. If a statewide or other scale of water user fee were established, part of it could be used for this purpose. Funding for ongoing O&M costs should

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	be from the water or sewer fund supported by local users through water or sewer rates.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.3 Provide Assistance, Training and Information	
Recommendation	13.2.3.A Develop an O&M plan that includes the types of ongoing O&M costs needed, O&M servicing and parts replacement schedule, and amount needed for O&M fund reserve to help the community plan ahead to address covering O&M adequately. This will also help identify any potential for cost savings through reduced O&M costs and explain any need for regular rate increases.
Lead Entity	The water or wastewater system owner.
Why	The water or wastewater system is subject to regulatory requirements from the SWRCB, County Environmental Health Department, or RWQCB. In addition, the physical facilities require maintenance and confirmation that the facilities operate as required. An operations and maintenance plan provides the basis for the activities and procedures necessary to satisfy the regulatory and operational demands of the systems.
How	The owner of the water or wastewater system is required to have certified operators for the systems. Either the owner, operator, or a consultant may prepare the appropriate operation and maintenance plan for the system(s).
When	An operations and maintenance plan should be in place at all times.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.3 Provide Assistance, Training and Information	
Recommendation	13.2.3.B Continue to provide, expand, and better publicize technical assistance training on developing rate studies and establishing rate policies, which should also include guidance on conducting a Prop 218 hearing. This type of assistance is currently available for disadvantaged communities from SWRCB technical assistance providers.
Lead Entity	State Agencies, Technical Assistance providers
Why	The Prop 218 process in California is complicated and nuanced. Many legal questions remain unanswered, even after almost twenty years. Many questions arise during a Prop 218 process, and can therefore become very expensive due to extensive legal consultation. The more training that Boards and staff receive before

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	embarking on a Prop 218 rate change, the more adept they will be at navigating the process and avoiding pitfalls. The availability of State agencies or other technical service providers for assistance during the process would be very useful to many small districts that do not retain regular counsel, however this does not dismiss the need for legal counsel. The local entity should hire an attorney for specific guidance through this process.
How	Holding periodic trainings in the physical context of government buildings can remind participants of the larger system in which they function as local government representatives. On the other hand, it might be most impactful to hold a training related to developing a rate study and conducting a Prop 218 hearing in particular communities, scheduled to precede a planned rate change.
When	Trainings should be held one to two times per year. Weekday evenings may work best.
Funding	Local funding, state agencies, or technical assistance funds already available could be used for this purpose.
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.A Do not allow new connections if the service capacity is not confirmed. This may require imposition of a moratorium. Developing appropriate connection fees, as recommended above, is necessary to provide a means to ensure that capacity can be made available for planned new connections.
Lead Entity	The water or wastewater system owner.
Why	An existing system is responsible to provide the water and wastewater services to the properties connected to the system. The existing system would not be able to fulfill the service obligation to new connections if the capacity was not available.
How	The owner of the water or wastewater system must know what the relative capacity and demands of the system are at all times so a determination of whether sufficient capacity is available to meet the proposed demands can be made. Establishing appropriate connection fees can help ensure capacity can be developed when necessary. If sufficient capacity is not available, and funds are not available to develop additional capacity, a moratorium on new connections should be pursued.
When	On-going.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.

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13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.B [See recommendations below under Recommendation 13.6 – Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues]
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.C Improve Groundwater Management Planning to address both declining water levels and increased water quality contaminant levels, and evaluate ways the two trends may be exacerbating each other.
Lead Entity	Department of Water Resources and local water agencies.
Why	<p>Groundwater levels within many areas of the Tulare Lake Basin Study Area have declined over time and there does not appear to be any reason to expect groundwater levels to stabilize. There are currently three basic methods available for managing groundwater resources in California: 1) management by local agencies under authority granted in the California Water Code or other applicable State statutes, 2) local government groundwater ordinances or joint powers agreements, and 3) court adjudications. However, no law requires that any of these forms of management be applied in a basin. Instead, groundwater management is often instituted after local agencies or landowners recognize a specific groundwater problem. The level of groundwater management in any basin or sub-basin is often dependent on water availability and demand.</p> <p>With the declining groundwater levels, it is becoming increasingly critical to manage and protect this resource, which is relied on for domestic uses by approximately 90% of communities in the Study Area.</p>
How	To be determined by the State of California. Local control of groundwater management activities may be maintained, however it is recommended that the Department of Water Resources consider ways to ensure that sufficient groundwater management planning is being conducted within the Basin to address declining groundwater levels and increasing water contaminant levels.
When	On-going.
Funding	Unknown.

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13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.D Clarify the interpretation of a well site control zone with a 50-foot radius, as referred to in Title 22, Chapter 16, Article, Section 64560 of the California Regulations Related to Drinking Water. The current interpretation in Tulare County is that there must be a 50-foot radius onsite around a well. This interpretation would require communities to purchase properties that are significantly larger than necessary. This interpretation would also eliminate existing lots within the community from consideration for use as well sites. Guidance should clarify how well sites may be able to meet the requirement to have a 50-foot control zone for source water protection, even if the well site itself is smaller.
Lead Entity	State Agencies
Why	It is noted that there is an acknowledgement of the need for some control of facilities or activities within the immediate proximity of public water supply wells. However, there have been interpretations of the subject code section that would require owners of new wells to physically acquire property that would exceed many properties available within a community. It is not believed that the intent of the code section is consistent with some of the interpretations. Some interpretations would impose a significant financial hardship to both acquire a large parcel and construct the water distribution facilities to connect the parcel to the existing community system. In addition, the definition of a control zone is in need of clarification for all parties involved (owner of the water system, county regulatory staff, SWRCB regulatory staff). Considerations of existing property uses and existing public rights of way adjacent to proposed water supply wells require clarification.
How	It is suggested that examples are provided by the SWRCB (Division of Drinking Water) that would clarify the definition of a control zone, as it may extend beyond the limits of the actual well site property.
When	Now.
Funding	Unknown.
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.E Consider ways to encourage and provide funding to sewer communities that rely on individual septic systems that are failing or are on inadequately sized lots.
Lead Entity	Funding agencies including the State Water Resources Control Board, USDA and possibly county agencies utilizing Community Development Block Grant funds

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Why	Failing septic tanks endanger public health in a number of ways, not least by exposing humans to raw sewage, and by contaminating groundwater supplies with bacteria and nitrates.
How	Conduct studies in communities that gauge the degree to which septic tanks are failing, what it costs homeowners to pump, repair and/or replace them. Conduct preliminary engineering studies that recommend a solution and develop estimated project costs and monthly sewer rates, so homeowners can make informed decisions.
When	Immediate and ongoing.
Funding	State Water Board, USDA, CDBG
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.F Allow drinking water funding agencies to fund infrastructure for fire flow requirements. Where affordability or feasibility of the project is jeopardized by meeting full fire flow requirements, also allow drinking water projects to be funded for domestic purposes provided a limited level of fire flow is available. Where a viable option, the feasibility of installing a dual water distribution system to meet domestic supply and fire flow requirements, should be considered (especially where irrigation demands can be accommodated through the non-potable system used for fire flow).
Lead Entity	County Fire, County Boards of Supervisors, and funding agencies such as USDA
Why	Especially in communities where water must be treated to remove contaminants, it should be an option for utilities to choose to treat only the water that is actually consumed by people. Fire flow and outside irrigation demands can represent a significant portion of the total water demand in a given community, and requiring that fire flow is always available means that more water is being pumped and treated than is being consumed. Dual systems present one way for communities to protect public safety without building oversized treatment and potable water distribution systems. The dual system can also allow for use of untreated water for irrigation purposes, additionally reducing the system treatment requirements. In cases where a dual system is cost prohibitive, and attaining fire flow requirements through the main potable system is much too expensive to operate, allowing a reduced fire flow capacity should be considered.
How	Adjust fire codes to allow for greater flexibility in the manner in which communities meet fire flow requirements, or perhaps reducing those requirements. Provide funding (e.g., Community Facility loans and grants through USDA) to install parallel piping that is dedicated for fire flow and landscape irrigation use. Utilize existing wells that do not meet Title 22 requirements to supply the second system, when available.
When	As soon as practicable.
Funding	USDA Community Facilities or Water & Wastewater loans/grants.

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13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.2 Encourage Shared Solutions to Reduce Vulnerability	
Recommendation	13.3.2.A Provide funding opportunities to encourage the development of regional cooperation, partnerships, and consolidation of services, where appropriate.
Lead Entity	State Agencies
Why	To encourage swifter implementation of appropriate shared or regional solutions, both “carrot” and “stick” approaches should be used in collaboration as appropriate towards that goal. Many local entities are otherwise uninterested and unwilling to even consider sharing services with neighboring systems and need further motivation.
How	State agencies should not issue permits to new water or wastewater systems within a municipality or within ½ mile radius of an existing entity providing water or sewer service without showing of a good faith attempt to obtain service from an existing provider and help bring them into compliance, if needed. For existing public water systems that are struggling to meet compliance or have a history of non-compliance, regulatory agencies should promote or enforce action towards consolidation or shared solutions, as appropriate.
When	These requirements should be used as part of the permit application approval process, funding application review process, and MCL enforcement and annual system inspection process.
Funding	State agencies would not need extra funding to utilize this oversight power. However, state funding sources should be made available to support development and implementation of these solutions in conjunction with any enforcement or regulatory action, as appropriate.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.A Consider changes on Category E (insufficient source water capacity or delivery capability) project rankings, to make it easier to get funding for that category of projects.
Lead Entity	State Agencies
Why	There are many communities with insufficient water supply, however, the criteria for funding eligibility is heavily weighted on water quality challenges. The lack of sufficient water quantity is often a significant problem.
How	Review and revise the guidelines for ranking of funding eligibility criteria to enable funding assistance for water supply sources, especially for those communities with a single source of supply.
When	Now.
Funding	Unknown.

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13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.B Continue the Pre-Planning and Legal Entity Formation Assistance Program. Consider creation of similar programs for wastewater for areas currently on septic.
Lead Entity	State Agencies
Why	There is a need for more flexible pre-planning funding to enable evaluation of appropriate governance alternatives to develop shared and regional solutions and to support solutions for areas not currently served by a public water system. The first round of applications for this indicated there was a large demand and unmet need, and additional rounds should be extended. This will both enable California to use its SRF effectively, and help communities most in need of developing solutions be able to do the analysis it needs to develop the best solution, and address eligibility barriers by developing appropriate entities for construction and full project implementation. Historically the evaluation and development of regional solutions has not been able to score high or pass through eligibility barriers and this funding pot was created specifically to help address those challenges and allow these sorts of projects to be developed when they address disadvantaged community safe drinking water needs. Similarly, creation of a similar program should be evaluated for areas on septic or with unaffordable wastewater services to evaluate development of shared or regional wastewater solutions.
How	Implement this through the Intended Use Plans of the SRF programs.
When	The IUPs are developed annually. Additionally, applications should be accepted throughout the year.
Funding	This is primarily aimed at utilizing funding through the SRF programs.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.C Continue the Consolidation Incentive Program, however, modify the system so that large systems do not obtain benefits that are significantly out of proportion to the benefits provided by consolidation. Also consider expanding the consolidation incentive program and make it available to larger systems seeking to assist communities of private well owners impacted by the drought and/or facing water quality challenges.
Lead Entity	State Agencies
Why	There does not appear to be any limitation on the benefits received by the entity willing to allow the consolidation of a smaller system. If the larger entity (Incentive System) can receive funding assistance drastically beyond the scale of the cost of improvements to receive a consolidation then the use of public funds consistent with the Priority Categories may be in question.

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How	Consider placing a limit on the allowed value of Incentive System projects that may be re-ranked to a higher Priority Category by virtue of a consolidation project. Also, consider allowing extension of services to those on State Small Systems and private wells that are contaminated or going dry, to be considered eligible for appropriate consolidation incentives.
When	Now.
Funding	Unknown.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.D Consider ways to expedite the funding process, so that communities applying for funding do not spend several years drinking water that does not meet primary drinking water standards, and/or relying on insufficient water supply.
Lead Entity	All funding agencies (US EPA, SWRCB, USDA, DWR)
Why	Currently, communities cannot apply for funding until an actual water quality violation is documented. Often, though, it is apparent that a problem is emerging as contaminant levels slowly climb. Allowing systems to apply for funding based on documented contamination levels that are projected to exceed an MCL in the coming two to five years, for example, would give communities a big head start on fixing problems. This could significantly reduce the time that people spend drinking unsafe water. Another consideration would be to streamline the funding process so that it does not take five plus years from the time of initial application to implementation of a project.
How	Consider amending funding regulations and intended use plans to allow application by water systems that can demonstrate a documented increase in a regulated contaminant that is projected to exceed the MCL in two to five years. Also, consider methods to speed up the funding process, including amending planning contracts by adding design and construction phases.
When	This is a change to regulations that could be made immediately. It is anticipated that the recent Drinking Water Program transition from CDPH to SWRCB may help the Drinking Water Program funding process.
Funding	The Safe Drinking Water State Revolving Fund would be the most obvious, and possibly this change could be implemented through a change to the Intended Use Plan. DWR IRWMP funding could also be a good source for funding to avert future problems. In both cases, planning funding could be expanded to allow for studies that monitor, assess and project contamination that could exceed a health standard.

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13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.E Streamline the process for payment of claims for state-funded projects, so that local water providers can receive more timely reimbursement. Simplify DWR IRWM claims reimbursement forms to be in line with SWRCB (Division of Drinking Water) claims process.
Lead Entity	All state funding agencies. USDA already makes payment electronically and in a matter of days.
Why	Waiting six weeks or more for state reimbursement puts water and wastewater systems in a difficult position. Often they owe hundreds of thousands of dollars to a contractor for a month's work, and simply have no way to pay until they receive their state check. Payment made quickly and electronically would save weeks of delay, interest paid, and intense hardship by small systems.
How	Streamline reimbursement processes by being less stringent on documentation. Set up electronic fund reimbursement and other processes to expedite payments. Consider making advances in cases of hardship.
When	As soon as possible.
Funding	None.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.F Require privately owned for-profit systems to conform to all requirements (including audits and other fiscal requirements) of publicly owned systems in order to receive public funding assistance.
Lead Entity	State Agencies
Why	Private for-profit systems are owned by an individual or private corporation. The general purpose of a private system is associated with the fiscal incentive for the owner of the system. Providing public funding assistance to upgrade privately owned water or wastewater systems may be construed as a gift of public funds. Private systems may not have been constructed or operated to the same standards as public systems. It may periodically be perceived that the users (tenants) of the private system are the primary consideration for determining if public funding assistance is appropriate. Care should be exercised to not remove the private owner responsibility for the water or wastewater infrastructure.
How	Ensure that the requirements associated with audits, fiscal reserves, rate structures, operational budgets, operational and managerial requirements, and technical requirements are mandated equally to all potential recipients of public funding assistance.
When	On-going.
Funding	No additional funding is necessary.

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13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.A Local service providers should attend existing grant application workshops, including CFCC Funding Fairs, and participate in other training opportunities provided through SWRCB, CWEA, CRWA, RCAC, and other resources.
Lead Entity	The water or wastewater system owner.
Why	Preparing funding applications is complex and challenging, and can often be expensive due to printing costs, the need for studies, and the time invested. Developing a better understanding of the application process, and learning about resources available to help, will help communities through this process.
How	Visit the CFCC Funding Fairs website for more information on funding fairs. http://www.cfcc.ca.gov/funding_fairs.htm
When	Annually.
Funding	The CFCC funding fairs are no cost. Other training opportunities should be paid for through the water or wastewater system user fees.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.B Participate in Integrated Regional Water Management Planning group meetings and consider becoming an “Interested Party” or “Member” of an IRWMP group.
Lead Entity	Water or wastewater system owner or manager
Why	Participation in local IRWM groups allow systems to understand the regional water management efforts being developed, inform those efforts with the needs of their local community, and develop joint projects to improve water quality, water supply, storm water management and flood control in each sub-basin. Disadvantaged community impacts and needs may not be adequately addressed in local management plans or understood by water management and other local agencies if local disadvantaged communities do not participate. Additionally, disadvantaged communities need to participate in order to ensure specific projects are developed and funded that address their critical needs.
How	Each IRWM group has its own unique governance structure and meeting process. Community representatives should contact the group in their region to get on the email list and ask how to become members or interested parties of the group. In general, becoming a member allows you to vote on decisions made by the group. Membership may be limited to public agencies in some cases. In some cases, fees are required, although DWR states that IRWM groups cannot require payment for local stakeholders to participate. Becoming an interested party may be a good way of getting started. That formal status means

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	that an entity has adopted and is supportive of the regional plan and its goals and objectives, and means it is a formal part of the planning group and generally invited to be part of any Advisory Board or stakeholder group meetings. Some IRWM groups only allow for formal submittal of projects by members, so interested parties can only propose projects that are formally sponsored by members.
When	Entities can join IRWM groups at any time. Contact the appropriate IRWM group to find out when the next meeting is and what the process is for becoming part of the group. It is best to join soon so that communities are able to be part of the process by the time the next funding and planning update takes place.
Funding	Each IRWM has different membership fee requirements, although all have an option for some form of formal participation that is free for disadvantaged communities. Communities should ask for technical assistance to support their ability to effectively participate in planning and project development from local IRWM groups, the Department of Water Resources (DWR), and local technical assistance providers. IRWM groups can include projects in regional applications that fund planning and project development and construction for disadvantaged communities. Under DWR's current funding guidelines for funding available to IRWMs, projects that advance critical needs in disadvantaged communities qualify for extra points and are not required to meet the same funding match and project readiness requirements as other projects. Additionally, DWR has set a goal for at least 10% of DWR's IRWM funding to fund disadvantaged community projects so local IRWMs may include DAC projects in regional applications to increase the competitiveness of funding applications.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.C IRWM groups should consider organizing pre-application and grant application workshops or training opportunities for DACs that are "Interested Parties" or "Members" of the IRWM group, as well as prepare and distribute outreach and educational materials to those DACs as funding from DWR is made available.
Lead Entity	IRWM groups
Why	Local IRWM groups benefit from engagement of DACs within IRWMs and development of DAC projects as part of integrated regional water management planning and project development applications. 10% of IRWM funding is aimed to be used for DAC projects. Additionally, IRWM applications receive additional points in scoring and cost waivers if projects to address critical water needs in DACs are included. Additionally, IRWM plans were created to address priority water needs in the region, which include disadvantaged community needs, particularly in the Tulare Lake Basin. If these plans and the projects to implement the plans are not addressing disadvantaged community needs, they are not accomplishing their goals and not adequately accomplishing the mission of IRWMs and the funding source. Because of that,

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	<p>each region should proactively encourage and facilitate effective inclusion of DAC needs and projects within IRWM planning and project application processes.</p> <p>Local IRWMs in the region have already taken many steps to do this, and this recommendation is to continue as well as expand these efforts to do more formal, extensive and timely outreach, training, workshops and technical assistance with each funding round.</p>
How	IRWM groups can organize formal and timely workshops and trainings specifically aimed at providing information and answering questions and supporting integration of DAC needs and projects for each round of DWR funding and plan updates. It would be most useful to invite the local DWR IRWM representative to also be present for these meetings in order to be able to answer any questions that may arise. Outreach and facilitation of these meetings would be done more effectively in partnership with local community-based nonprofits and technical assistance providers. The database of DACs and outreach contact lists developed for this TLB DAC Study should be integrated into each IRWM group's database and used for planning, communication and outreach efforts.
When	This should be conducted enough in advance to allow for preparation and submission of projects within the IRWM application timeline, as well as any regular plan updates.
Funding	The costs of hosting meetings and outreach could be funded as part of administrative staff costs of IRWM groups, and could also be included in any applications for planning and technical assistance grants through State agencies.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.D Consider ways to allow communities in IRWM "white areas" (areas not currently within an IRWM group boundary) to participate in the IRWM process.
Lead Entity	DWR
Why	There are communities that are not within the boundaries of an IRWM group, but would like to participate in the IRWM process. The communities are currently unable to participate.
How	Needs to be considered by DWR.
When	Now.
Funding	DWR and IRWM groups.

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13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.A Provide the community as much information as possible and opportunity to provide input early on in the process. Local water and wastewater providers should include funding and/or staff time as part of annual and project budgets to conduct community outreach, education, consultation with community residents/users (through community meetings) in order to address barriers and lack of information and to evaluate and implement recommendations identified by the users.
Lead Entity	Local water or wastewater providers or entities acting as project applicants on behalf of DACs.
Why	Communication is critical for community acceptance. Community acceptance will help implementation of the solutions and overcoming barriers. It will also help support acceptance of reasonable rate increases needed to ensure adequate service or improvements.
How	<p>How: Local providers should consider holding regular community meetings and sending out letters to consumers with updates on services and inviting them to participate in consideration of alternatives and throughout the development of major projects. The more transparent information that is available and opportunities for discussion, the more that community leaders can support informed choices and gain broad support.</p> <p>There are two primary activities to accomplish this:</p> <ul style="list-style-type: none"> ○ An effective communications plan. Local services providers should proactively update the community on its services and notify customers of opportunities for input on new project development. Notices should be delivered to each household and translation should be provided as needed. In most DACs, a significant percentage of the population is primarily Spanish-speaking and therefore Spanish translation should be provided for notices and at public meetings. Local service providers should consider having bilingual staff or securing a contract with a translator to regularly translate important public documents and provide interpretation at public meetings when needed. Translation should be included in job descriptions or contracts included as part of the system's annual budget. ○ A responsive scope of work for project development. Local service providers should ensure that any scope of work with an engineering firm includes transparent evaluation of alternatives to minimize O&M costs, and includes the need to explain project alternatives to the community and effectively incorporate and respond to feedback. For large, complex project planning processes involving more than one community, the contracts should include subcontracts with a community facilitation team that relates well to community members, as well as engineers, and that should be included in any funding scope of work. The more board members and community members and other interested parties can be provided analysis of the pros and cons and realistic estimated costs for consumers of

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	various alternatives, the better decision-making that can take place.
When	This is particularly important for systems when developing new projects, and is important to include within any project application scope of work. But there is also an on-going need to communicate with consumers effectively about the services being provided.
Funding	Funding for on-going regular communication should be included in the system's annual budget as part of the cost of services. However, when more intensive analysis, facilitation and communication services are needed around major project development, this can be funded by including it in the scope of work for project applications, particularly within planning and pre-planning funding sources.
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.B Attempt to use in-person, phone or mail outreach to DAC residents as much as possible; email and website should be utilized, but are not sufficient on their own.
Lead Entity	Local service providers and other entities providing outreach and communication with DACs.
Why	Many DAC members and representatives do not have access to internet or email. Residents of DACs can be better reached by mail, phone or through in-person outreach. Email outreach is not sufficient on its own to reach DAC stakeholders.
How	Flyers sent out with bills, door-to-door outreach, and direct mail are the most effective. Mailing lists may be obtained with the local water provider and county registrar. Consider asking local community leaders within the community to help do door to door outreach to distribute flyers or contract with other service providers that specialize in culturally appropriate outreach and community engagement. Local non-profit organizations can be used to aid in outreach efforts and updating contact information.
When	Any major outreach efforts, including notices of meetings for major project development or updates from the water or wastewater system should strive to use effective forms of communications.
Funding	These costs should be included as part of administrative budgets or outreach budgets within project development scopes of work.
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.C Expand community engagement in the development of projects. Funding to facilitate community engagement should be included in project budgets and standard approved scopes of work for project development at both the planning and construction phase. Feasibility studies funded by public funds must evaluate alternatives (including costs to end users and an evaluation of pros and cons) This information

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	should be provided to the community at a public meeting for feedback as part of the planning process to select final alternatives for implementation. While this is typically already required to be presented during open session Board meetings, increased community engagement is recommended.
Lead Entity	Local service providers and State agencies.
Why	In order to ensure that the best project alternative is developed and that there will be strong community-support to facilitate swift implementation and support any rate increases, there needs to be effective community engagement and sufficient analysis to provide for informed and transparent decision-making. Opportunities for community engagement are typically required through open session Board meetings, for which agendas must be posted for the public.
How	Standard scopes of work for planning and construction phases should include community engagement, and feasibility studies should evaluate alternatives to show pros and cons and estimated resulting costs to end users.
When	During development of any proposed project.
Funding	Outreach efforts could be funded through the project funding program and/or through the water or sewer fund of the local service provider.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.A County planning departments should require any new development near an existing system (within 1-2 miles) to evaluate the feasibility of connecting to the existing system, rather than permit the creation of a new system.
Lead Entity	County Planning Departments, LAFCOs, and State Agencies
Why	Permitting development of a new water system where there is the potential to connect to an existing neighboring system perpetuates the priority issues that this Study and the recommendations herein aim to resolve. It is creating a new small system that will likely struggle to maintain sufficient TMF capacity, primarily due to lack of economy of scale, and where there are water quality issues known, this creates another system for which water quality issues will need to be resolved. On the other hand, if the new development connects with an existing system, it can help to bring that system into compliance rather than constructing a new system, it can provide improved economy of scale and additional rate payer base, it may allow access to additional resources, and it will allow for increase reliability for the system.
How	Address policy issues and permitting requirements for new systems to more actively require new development to connect with existing water and wastewater systems where feasible. County Planning Departments may not necessarily have the legal authority to require the existing system to make the connection. However, they can and should recommend that the property to be developed be annexed.

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	LAFCo should also consider this within the LAFCo approval processes.
When	Any time new development is proposed.
Funding	County, SWRCB
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.B Require and actively support investment in bringing existing systems into compliance and developing long-term sustainable and affordable solutions before allowing growth and as part of permitting growth in communities where the existing water system cannot accommodate growth due to inadequate drinking or wastewater infrastructure.
Lead Entity	Local entity, County, LAFCo, State funding agencies, and Legislature.
Why	Unless a local entity water or wastewater system is in compliance with regulatory requirements and is fiscally sustainable, it is unable to provide reliable and sustainable water and wastewater services to any new connections
How	The local entity must prove the ability to provide Technical, Managerial, and Financial capabilities for a sustainable system prior to consideration of growth. County planning should require such proof prior to proceeding with consideration of new development that would rely upon the local system(s). LAFCos should also consider this within the LAFCo approval processes.
When	On-going.
Funding	Local entity rate structure
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.C In cases where there is a moratorium on connecting to a public water system, the county should not issue a permit to drill a private well on a property within the district boundary. Additionally, public water systems should consider implementing an ordinance prohibiting new well drilling within the PWS boundary and notify the county of this ordinance. Permitting of a private domestic well outside of the district boundary should be allowed only if the new well meets primary drinking water quality standards and will not significantly impact existing PWS. Counties should not permit a new well that does not meet standards, unless it is demonstrated that a treatment system will be installed.
Lead Entity	County, local service provider.
Why	Typically a water system will issue a moratorium if they have insufficient supply to serve new customers. If a landowner is then allowed to drill a new well within the district boundary it can impact the district's supply

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	source, and may allow a path for contamination of the district's supply. In areas where water quality is an issue, issuance of a permit for a new well also allows for the homeowner to develop a new source of supply which is likely to have water quality problems.
How	Consider amending county well permitting ordinances to clarify that permits will not be issued for new private wells to be drilled within the boundaries of an existing public water system. It is important that systems implement a moratorium and notify the county of the existence of a moratorium. Existing water systems should also consider establishing an ordinance prohibiting drilling new private wells within the system boundaries (not just a moratorium on connections). Additionally, consider amending county well permitting ordinances to clarify that permitting of new domestic wells outside of water system boundaries are required to show that the new well can meet drinking water standards for commonly known contaminants in the area (or implement adequate treatment devices) and will not impact water supplies of existing users.
When	Anytime
Funding	No funding source necessary.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.D In areas where there is no existing water system infrastructure available, building permits should only be issued if adequate supply and quality from a private well is confirmed to be available. This may include installation of a viable treatment system (POU or POE) with acceptable maintenance service.
Lead Entity	Counties, Legislature
Why	Issuance of a permit to build a home on a property where there is not existing water system infrastructure available, and where the supply and quality available from a private well are not confirmed to be sufficient, puts the homeowner or tenant at risk of having a water supply that does not meet water quality standards and/or water supply that may be insufficient.
How	Require an analysis of water supply prior to issuing a building permit. In areas of known groundwater contamination (high levels of primary constituents), counties should not zone for residential building.
When	Now, ongoing.
Funding	No funding necessary.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.E Provide enforcement action when people do not obtain a permit for drilling of a new well or installation of an onsite wastewater system.
Lead Entity	County
Why	It has been noted that some property owners have drilled a private well and/or installed a septic system without a permit from the county. This poses a health risk for the well user in addition to neighboring well owners whose well could be contaminated by an improperly constructed well or septic system.
How	To be determined at county level. Enforcement action may include fines and/or shutting down the well.
When	Soon, ongoing.
Funding	Counties.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.A All counties shall identify areas where new growth should be directed based on the existence of public water and sewer governance and infrastructure. Counties shall only zone for residential development where there is safe and reliable water, except in situations where there are viable plans to provide safe and reliable drinking water, and additional growth will create more economy of scale and bring a greater rate payer base that will allow for a solution to be sustained. <i>Note: this is not intended to limit the ability to create infrastructure in existing communities that currently rely on private wells or septic systems; rather, this recommendation is intended to limit growth in areas that do not have sufficient governance and infrastructure to accommodate such growth.</i>
Lead Entity	County Planning Department and LAFCos
Why	The proliferation of small water systems that lack economy of scale and proper technical, managerial, and financial capacity is a large part of the problem faced by communities in the Study Area. By encouraging growth around existing public water and sewer systems and discouraging growth in other areas, this problem can be minimized in the future. However, it is important to confirm the capacity of the existing systems prior to zoning for residential development that would rely on those systems. Implying the potential for growth in areas that do not have proven safe and reliable water supply sources is not exercising due diligence in land use planning.
How	Planning documents should account for existing infrastructure and governance structures that are available when zoning for residential land use. When growth is encouraged near (within 3-5 miles) existing public systems through planning documents, those systems potentially impacted should be notified. Counties

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	should require proof of the existence or reasonable capability to provide safe and reliable water supply to an area prior to defining land uses or zoning for potential land uses in areas within the county. LAFCos should also consider this within LAFCo approval processes. Where this would require re-zoning of areas, legal counsel should be consulted to make sure property rights of owners are not being infringed upon.
When	Now and any time planning documents are reviewed and updated.
Funding	County Planning Department.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.B The water quality from private wells shall be analyzed and any contaminants exceeding primary drinking water quality standards should be disclosed upon sale of a property. The contaminants to be analyzed may vary by county or region within California; however for the Tulare Lake Basin it is recommended that, at minimum, water quality from private wells should be analyzed for coliform bacteria, nitrates and arsenic. If other contaminants, such as uranium, TCP, Chrome-6, perchlorate, or DBCP are known to be prevalent in the area near the subject property, a buyer may request analysis of the known contaminants in the area. This would put some onus on the Department or Real Estate to inform realtors of the water quality issues in their area of service.
Lead Entity	State Agencies, Department of Real Estate, Legislature, property owners
Why	There are currently no requirements for ongoing monitoring of private well water quality. As such, a homeowner may have no reasonable way to know the quality of water that is being consumed, and may not even consider that it could have contaminant levels in exceedance of a water quality standard. A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	Through State Agencies, Legislature, and/or Department of Real Estate require that water quality be disclosed upon sale of a home. The water quality disclosure will be between the seller and the buyer. This is not recommended to be public information, due to the confidentiality and privacy considerations of property owners.
When	Now, ongoing.
Funding	Funding for water quality sampling will be through real estate transactions.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.C Clarify conflicting policies related to farm worker housing. The policy that counties shall permit and encourage the development of sufficient farm labor housing (California Health and Safety Code Section 17021.6) can be inconsistent with the requirement to provide safe drinking water (in areas where water quality does not meet drinking water standards). There should be no requirement to issue a permit if doing so causes a violation of water quality standards for the tenants to be served. These conflicting policies put counties in a difficult position.
Lead Entity	State Agencies
Why	The California Department of Housing and Community Development analyzes special housing needs for farm workers. There can be a legal conflict if it is demonstrated that there is a need for farm labor housing under the Housing Element, but water meeting drinking water standards is not available to that farm labor housing development. In this case, the county has a dilemma as to whether or not to permit the farm labor housing knowing that their water supply will not meet State and Federal drinking water standards. In either case, they would be required to violate a State policy.
How	To be determined by State agencies.
When	Now.
Funding	Unknown.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.A Tulare County should continue to update and maintain the database that was developed through this Study. Local data stewards from each of the other three counties (Fresno, Kern, and Kings) should be established to assist in the quality control of the data collected for each respective county. The uses of this database could be many, but the primary purpose would be to track improvements to the water supply quality and reliability in the Study Area.
Lead Entity	Tulare County (Lead), Fresno, Kern, and Kings Counties (local data stewards)
Why	The uses of this database could be many, but the primary purpose would be to track water quality and supply issues in the Study Area, as well as changes overtime (improvements in the conditions, or otherwise). It is noted that at present there are many communities with an unknown source of water.
How	Data will be maintained by Tulare County and updated on approximately an annual basis.
When	Current and ongoing.

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Funding	Tulare County.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.B Tulare County should track progress with respect to the priority issues identified in this Study. Monitor and measure the success of improving the circumstances of DAC water and wastewater systems through implementation of recommendations, relative condition of drinking water supplies, and condition of wastewater service. This could be done in coordination with the SOAC, if the SOAC is continued as recommended.
Lead Entity	Tulare County (Lead), Fresno, Kern, and Kings Counties (local data stewards)
Why	To monitor and measure the success of this Study through implementation of recommendations, based on relative condition of drinking water supplies and wastewater service.
How	The website that will host the data is currently being developed. Data will be maintained by Tulare County and updated on approximately an annual basis. Statistics related to the number of water quality issues, water supply issues, wastewater treatment and disposal issues, and other factors can be compared and charted to monitor progress.
When	Ongoing.
Funding	Tulare County, and other local and State agencies.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.C Improve the County Environmental Health Department responsibilities, fee authorities, and requirements to permit and monitor on-site systems. (There was a frequent observation that records for on-site systems were non-existent – i.e. Plainview, Rodriguez Labor Camp). Improve data collection, reporting, and management for private domestic wells, State Small Systems and septic systems so that the water supply and onsite wastewater conditions can be better documented and understood. Local counties or state agencies should maintain a database of information related to private wells and septic systems, including the location, size, condition, and depth of facilities. This database should be created to include all new individual wells and septic systems, as well as any modifications to existing facilities that are requested. Eventually the goal should be to include data on existing facilities, however it is understood that the effort to collect and report data on existing facilities would take years to complete.
Lead Entity	County Environmental Health Departments
Why	It is apparent that there are many private, on-site water and wastewater systems with non-existent or

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	<p>insufficient records of the facilities. The lack of records includes topics such as design capacity, on-site sustainability, inspections, and records of “as-constructed” facilities. The lack of records impacts the ability to evaluate adequacy of existing systems and impacts the ability to develop new community systems in areas that are served by on-site systems.</p> <p>In order to ensure private well and septic systems are adequate to provide safe drinking water and protect local water quality and public health, counties maintain local ordinances and implement permitting programs. A database could provide more efficient and accurate means of ensuring that local facilities are protective of public health and meeting all requirements, and could be used to inform on-going planning, permitting and code enforcement activities. Specifically, it is important to understand the physical location, depth and design of facilities so that 1) the county can confirm sufficient separation between facilities is available, 2) the property owner is knowledgeable when facilities need to be maintained, fixed, or replaced, and 3) in the case that a new water or sewer system is being considered, the county and/or engineers can understand the location of facilities during the feasibility analysis.</p>
How	The building permit process must include complete records regarding proposed and “as-constructed” on-site water and wastewater systems.
When	Now, ongoing.
Funding	Well drilling and onsite wastewater permit fees. Current county permit fees for these activities should be re-evaluated to ensure they are adequate to meet administrative costs for an effective permitting program.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.A Improve the County Environmental Health Department responsibilities, fee authorities, and requirements to permit and monitor on-site systems. (There was a frequent observation that records for on-site systems were non-existent – i.e. Plainview, Rodriquez Labor Camp). [See Recommendation 13.7.1.C]
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.B Develop a centralized reporting and data management system so that water supply related data can be shared and coordinated among agencies. For example, well logs retained by DWR can be correlated with water quality information retained by SWRCB. This will likely require confidentiality agreements between agencies.
Lead Entity	State Water Agencies (DWR, State Water Board)
Why	Water data is currently housed in many different agencies and not accessible or easily integrated to inform planning, regulatory activities, or water management. The state should provide consistent and ideally

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	centralized or easily integrated data management systems to allow for water data to be more effectively utilized and support good decision-making.
How	All state agencies should have consistent protocols and requirements for electronic reporting in water monitoring or data reporting requirements within regulatory or other related programs. Currently, Geotracker GAMA seems to include most water quality data, while DWR holds records on water supply and well completion reports. Integration of the Drinking Water Program into the State Water Board will likely speed up integration of drinking water reporting systems with other State Water Board databases. However, it is unclear how DWR data and State Water Board data will be better integrated. Confidentiality issues will need to be coordinated between state agencies that may obtain access to confidential data
When	This should be evaluated as part of the Governor's efforts to improve groundwater management.
Funding	This could be funded through general funds, program fees, and bond where appropriate within the State budget and appropriation process.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.C Disclosure of water quality data – Require disclosure to the buyer of water quality on sale of property. In areas where there is a Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would be laboratory reports for samples collected from the private well. Recommend sampling for known and suspected contaminants in the area [See Recommendation 13.6.2.B].
Lead Entity	State Agencies, Legislature, Department of Real Estate, local water service providers, property owners
Why	A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	How: Through State Agencies, Legislature, and/or Department of Real Estate, require that water quality be disclosed upon sale of a home. For properties served by a regulated Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would require sampling and disclosure of laboratory reports indicating constituent levels and whether or not they are in exceedance of any primary water quality standards.
When	Now, ongoing.
Funding	Funding for water quality sampling and disclosure will be through real estate transactions.

PRIVATE WELL OR SEPTIC SYSTEM OWNER

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Private Well or Septic System Owner

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.A. Ensure that the specifics regarding existing infrastructure are known. The location, size, condition, and depth of private well or septic system facilities should be known by the property owner and maintained in a database by the county [See Recommendation 13.7.1.C].
Lead Entity	The owner of a private well or septic system
Why	If a property owner has knowledge of the infrastructure that exists on his property, it will help to more effectively and efficiently address problems (e.g. well goes dry or septic system fails) when they arise, and may help to understand when a problem may be coming so it can be addressed before a failure occurs.
How	Obtain information from the well driller, pump contractor, or contractor who is installing the septic system. Confirm that the well driller or contractor has obtained appropriate permits from the county and that details of the construction are submitted to the county to maintain in their database. For existing facilities, information should be available at the county.
When	Anytime that a new well is drilled, septic system installed, or when any modifications to an existing well or septic system are made (for example, deepening a well). This information should also be requested when purchasing a property, either from the seller or the County. If the information is not available, it would be advisable to have a contractor inspect these facilities and produce the necessary information so that the buyer knows what he is purchasing.
Funding	Funding: No funding source is necessary. This is a matter of maintaining records of what is on a landowner's property.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.B Create a single local point of contact for local service providers and private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges.
Lead Entity	Counties and/or district offices of SWRCB could develop a single point of contact. Local service providers and private well and septic system owners can utilize existing resources at the county and State levels.
Why	Currently, it is difficult for individuals and small DACs to navigate existing requirements, resources, and opportunities. A single point of contact would allow communities or private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges more efficiently. Additionally, a single point of contact could help coordinate more effective access for other public, private and non-profit agencies (such as LAFCo, private water companies or contractors, and assistance providers) trying to provide support to address these issues. Some counties, and the SWRCB, RWQCB, and other agency websites provide forms of an information clearinghouse that are good resources for information on many water and wastewater related programs, requirements, and resources. A point of contact at the local level would help water and wastewater service providers or private well owners navigate and identify existing resources to get information related to their system issues.
How	Designating a staff person as the primary single point of contact in each local county or each district office of SWRCB would enable local water and wastewater providers or private well owners to identify appropriate websites, resources, and other information from the County Environmental Health, SWRCB, RWQCB, or other websites to access information, answer questions, obtain necessary forms, learn about training and funding opportunities, and stay aware of new regulations. The point of contact could also have recommendations on more specific contact persons on any particular topic or program that could help provide more detailed information and assistance.
When	Ongoing.
Funding	Creation of a single point of contact would likely need to be included in county or state agency staff/operating budgets. Some funding may be able to be targeted to support this through capacity building or technical assistance set asides of the SRFs. Funding for this resource could also be developed through permit fees for local water systems, domestic well owners, septic owners, and wastewater systems as part of the support services for administration of the drinking water and/or wastewater regulatory permitting programs.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.B The water quality from private wells shall be analyzed and any contaminants exceeding primary drinking water quality standards should be disclosed upon sale of a property. The contaminants to be analyzed may vary by county or region within California; however for the Tulare Lake Basin it is recommended that, at minimum, water quality from private wells should be analyzed for coliform bacteria, nitrates and arsenic. If other contaminants, such as uranium, TCP, Chrome-6, perchlorate, or DBCP are known to be prevalent in the area near the subject property, a buyer may request analysis of the known contaminants in the area. This would put some onus on the Department or Real Estate to inform realtors of the water quality issues in their area of service.
Lead Entity	State Agencies, Department of Real Estate, Legislature, property owners
Why	There are currently no requirements for ongoing monitoring of private well water quality. As such, a homeowner may have no reasonable way to know the quality of water that is being consumed, and may not even consider that it could have contaminant levels in exceedance of a water quality standard. A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	Through State Agencies, Legislature, and/or Department of Real Estate require that water quality be disclosed upon sale of a home. The water quality disclosure will be between the seller and the buyer. This is not recommended to be public information, due to the confidentiality and privacy considerations of property owners.
When	Now, ongoing.
Funding	Funding for water quality sampling will be through real estate transactions.

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13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.C Disclosure of water quality data – Require disclosure to the buyer of water quality on sale of property. In areas where there is a Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would be laboratory reports for samples collected from the private well. Recommend sampling for known and suspected contaminants in the area [See Recommendation 13.6.2.B].
Lead Entity	State Agencies, Legislature, Department of Real Estate, local water service providers, property owners
Why	A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	How: Through State Agencies, Legislature, and/or Department of Real Estate, require that water quality be disclosed upon sale of a home. For properties served by a regulated Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would require sampling and disclosure of laboratory reports indicating constituent levels and whether or not they are in exceedance of any primary water quality standards.
When	Now, ongoing.
Funding	Funding for water quality sampling and disclosure will be through real estate transactions.

**WATER OR WASTEWATER SYSTEM OWNER/
LOCAL SERVICE PROVIDER**

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Water or Wastewater System Owner/Local Service Provider

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.B. Ensure that specifics regarding existing water or wastewater system infrastructure are known. The location, size, condition, and capacity of facilities should be known and records maintained by the community services management personnel.
Lead Entity	Water or wastewater system owner
Why	When the owner of infrastructure has information regarding the location, size, depth, materials, age, capacity, and condition of the facilities, the owner will be able to a) effectively respond to problems with the facilities, and b) know the capability of the existing infrastructure to meet existing and proposed demands. Knowledge of the existing infrastructure is critical when planning expansions or upgrades to said infrastructure. This information is also useful for LAFCOs conducting Municipal Service Reviews for publicly-owned systems and mutual water companies, and should be integrated into those reports to the extent appropriate.
How	Records of existing infrastructure should be available at the office of the local service provider. If records of existing infrastructure are not readily available, the county may have information regarding infrastructure within existing rights of way. Another source of information may be the engineer of record for the respective improvements. The RWQCB and SWRCB Division of Drinking Water may also have information associated with wastewater treatment and water supply infrastructure, respectively. If no records are available, a survey of ground surface infrastructure (manhole lids, cleanouts, valves, hydrants, meters, wells) may provide limited information regarding the location of infrastructure.
When	Improvement plans are required to be approved by the local service provider prior to construction. Copies of the “as built” plans are to be maintained by the local service provider upon completion of construction. Records of repairs or modifications to the existing infrastructure are to be maintained by the local service provider.

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Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.C. Conduct a review of fiscal resources annually and determine the necessary levels of reserves for replacement and maintenance of all infrastructure. Determine an appropriate time frame and funding plan to achieve the necessary levels of reserves.
Lead Entity	Water or wastewater system owner
Why	The owner of the water or wastewater system has the responsibility to operate and maintain the facilities. Operation and maintenance responsibilities include payment for power, chemicals, labor, insurance, communications, maintenance equipment, regular maintenance of the facilities, response to failures or damage of the facilities, and replacement of facilities that have reached the end of their respective useful life. Reserves are necessary to be able to respond to catastrophic failures or emergencies (i.e. failure of a well pump). If the fiscal resources are not sufficient to satisfy the basic demands of sustaining the facilities, adjustments to the monthly rates are necessary.
How	Public water and sewer systems are subject to annual audits of fiscal resources and procedures. In addition, the owners of water and sewer systems should define an operations budget for all required expenditures and necessary savings for replacement/repair of infrastructure. Private water and sewer systems should also define an operations budget for all required expenditures.
When	Review and adjustments to fiscal resources should be an on-going activity. However, the owner of the facilities should define a budget annually. Typical fiscal year cycles for public systems begin on July 1 of each year. The activity of preparing the budget for the next fiscal year would typically include a review of the fiscal performance of the previous year so that appropriate adjustments may be included in the upcoming budget.
Funding	Review of fiscal resources and performance of the water or sewer system is funded through the operations funds of the owner of the facilities.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.A. Attend training programs and encourage or require other staff and board members to attend training programs.

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Lead Entity	Water or wastewater system owner
Why	Training is appropriate for everyone involved in the management of a water or wastewater system, regardless of size. Especially in small or isolated communities, boards and staff may get stuck in ruts or patterns of management that persist over many years. Minimal outside intervention and a limited pool of board/staff candidates combine to create an insular environment that may be resistant to change. Training brings in new perspectives and new approaches and can revitalize institutions that lack forward motion.
How	<p>The water or wastewater system owner or manager should convey the importance of attending trainings and what it can mean for the community.</p> <ul style="list-style-type: none">○ Attend trainings provided by Rural Community Assistance Corporation (RCAC) in coordination with SWRCB. RCAC provides free statewide training throughout the year at locations around California under a contract with SWRCB. Local SWRCB Division of Drinking Water District Offices can request specific training topics be offered in their area, if information is available indicating an interest in that topic. The Division of Drinking Water encourages local water providers and assistance organizations to review the RCAC training topics and provide input to the local District Office on desired local training. The RCAC training program can be viewed at http://www.rcac.org/event/1114.○ Operator training – Participate in existing local entities such as California Water Environment Association (CWEA) and California Rural Water Association (CRWA).○ Board and leadership training – Participate in board training opportunities such as leadership training and ethics training. SWRCB (Division of Drinking Water) in coordination with Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) will be providing targeted board training for several communities in the Study Area; there is potential for this program to be expanded and continued to other communities.○ Network with other communities, share resources and information, and provide informal training to one another.○ Utilize web portals from state agencies and counties, as well as funding fairs, to access information on training programs, funding opportunities, and other available resources.
When	Managers, board members, and operators should attend appropriate training programs annually, at minimum.
Funding	The source of funding is the water or sewer fund of the local service provider. Technical assistance funding from State agencies may be available to supplement these costs in some cases (i.e. operator certification reimbursement programs) or bring specific trainings to local areas.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.B Create a single local point of contact for local service providers and private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges.
Lead Entity	Counties and/or district offices of SWRCB could develop a single point of contact. Local service providers and private well and septic system owners can utilize existing resources at the county and State levels.
Why	Currently, it is difficult for individuals and small DACs to navigate existing requirements, resources, and opportunities. A single point of contact would allow communities or private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges more efficiently. Additionally, a single point of contact could help coordinate more effective access for other public, private and non-profit agencies (such as LAFCo, private water companies or contractors, and assistance providers) trying to provide support to address these issues. Some counties, and the SWRCB, RWQCB, and other agency websites provide forms of an information clearinghouse that are good resources for information on many water and wastewater related programs, requirements, and resources. A point of contact at the local level would help water and wastewater service providers or private well owners navigate and identify existing resources to get information related to their system issues.
How	Designating a staff person as the primary single point of contact in each local county or each district office of SWRCB would enable local water and wastewater providers or private well owners to identify appropriate websites, resources, and other information from the County Environmental Health, SWRCB, RWQCB, or other websites to access information, answer questions, obtain necessary forms, learn about training and funding opportunities, and stay aware of new regulations. The point of contact could also have recommendations on more specific contact persons on any particular topic or program that could help provide more detailed information and assistance.
When	Ongoing.
Funding	Creation of a single point of contact would likely need to be included in county or state agency staff/operating budgets. Some funding may be able to be targeted to support this through capacity building or technical assistance set asides of the SRFs. Funding for this resource could also be developed through permit fees for local water systems, domestic well owners, septic owners, and wastewater systems as part of the support services for administration of the drinking water and/or wastewater regulatory permitting programs.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.D Continue to convene a DAC focused stakeholder group for the Tulare Lake Basin, and expand outreach and engagement to further enhance DAC, County, IRWM, and other local stakeholder engagement and participation. Expanded outreach and engagement efforts should educate local board members, operators, and residents on local water and wastewater challenges and priority issues, as well as resources that are available, including findings and recommendations developed through this Study and existing resources from technical assistance providers. Continuation of stakeholder meetings should occur at least quarterly to track progress on the recommendations of this Study and provide updates on new program, challenges, resources or opportunities.
Lead Entity	The stakeholders that have participated in the Tulare Lake Basin Disadvantaged Community Water Study (particularly those in the SOAC), including state agencies, counties, IRWMs, DAC representatives, and non-profit organizations.
Why	Local DAC stakeholders have found it to be valuable to come together on a regular basis to discuss local DAC issues, opportunities and programs, and reflect on recommendations through this multi-year Study process. The SOAC recommended that the group continue to meet quarterly to track progress on the recommendations of this Study, as well as engage more extensive DAC stakeholders through a local follow-up outreach and engagement campaign. Expanded outreach and engagement would help enable local systems to utilize tools and lessons learned through this Study, as well as other existing resources, and develop appropriate solutions. This would help ensure that this Study is more than just a report, but will actually be accessed by communities and help to develop long-term sustainable solutions to local water and wastewater challenges.
How	This would be best accomplished through continuation of the SOAC process through a coordinated effort with all the stakeholders, counties, organizations and agencies that have participated in the Tulare Lake Basin Disadvantaged Community Water Study. Some funding would be needed to 1) have a coordinating entity continue to facilitate these groups and invite representatives to participate in local stakeholder meetings, and 2) support planning and implementation of expanded outreach and engagement throughout the Basin. Participation from local disadvantaged communities, counties, non-profits and funding agencies directly in the outreach and engagement would help make these efforts more effective by lending credibility, resources, and reliability through personal connections from communities in similar situations.
When	Following completion of this Study, meet quarterly and identify a plan and funding to expand outreach and engagement to additional stakeholders in the Basin.
Funding	Counties could fund continuation of quarterly meetings of the SOAC. Additionally, the group could approach

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	state or federal funding agencies about funding for a coordinating entity (a non-profit or local agency) to coordinate an expanded outreach, education, and engagement campaign to follow up after this Study has ended. Local non-profits could approach private and public funding sources to support these efforts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.A Even outside of larger infrastructure project development processes, alternatives such as sharing common resources, forming joint governmental agencies, or other forms of consolidation should be evaluated to determine if O&M costs could be reduced or TMF capacity improved.
Lead Entity	Local water and wastewater providers and entities developing applications for improvements to disadvantaged community water and wastewater systems should examine these alternatives. Also, state and federal funding agencies should support examination of these alternatives within the scope of work of public funding agreements
Why	For some areas, a sustainable and affordable solution could be made possible through some form of regional or shared solution that would allow communities to share ownership and operation of water infrastructure as well as create a sizable enough funding base of rate payers to have a sufficient economy of scale for operations and maintenance. Local agencies should examine the full range of alternatives and evaluate how costs may be able to be reduced through shared solutions in order to address immediate and long-term operations and maintenance funding and TMF capacity challenges.
How	Water and wastewater providers should ask local district engineers to examine these alternatives, and should seek out contractors and engineers that have experience with this kind of analysis and have proven experience in successfully developing these kinds of solutions. A third party entity, such as a county, non-profit or other group could also develop an analysis of alternatives with a number of communities jointly. However, in all cases analysis should be transparent and community-driven, allowing the community to understand and provide input into the pros and cons and real O&M costs of alternatives.
When	It is easiest to do this as part of funding applications for feasibility studies when solutions are being developed because there are funding sources available to cover the costs of providing these types of analysis. However, similar analysis should be discussed with local district engineers outside of larger capital project development as well.
Funding	The primary source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service. Sources of external funding for this may include the new pre-planning entity formation set aside as part of the SDWSRF. However, all feasibility study planning funding from the state or federal funding sources should include this kind of analysis. In addition, IRWM

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	funding could support this, as well as sustainable community planning funding grants.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.A Project alternatives should be analyzed to minimize ongoing costs and secure TMF capacity. If O&M costs cannot be supported or TMF capacity challenges are not adequately addressed, other alternatives should be pursued.
Lead Entity	Any DAC considering making any improvements to their water or wastewater system.
Why	O&M costs have to be borne by the users in the community. Depending on the median household income in the community, the utility rate increase may adversely impact the users. State agencies have implemented requirements within their funding programs for full evaluation of the operation and maintenance lifecycle costs for a selected project, along with a water rate study to identify what impact the project has on the cost of water for that community. If the projected water rate is deemed to be unaffordable, they will not (and should not) fund the selected project.
How	Solutions should be analyzed to minimize ongoing costs. If O&M costs of a project cannot be supported, other alternatives should be pursued. Developing an O&M plan that includes the types of ongoing O&M costs needed, O&M servicing and parts replacement schedule, and amount needed for O&M fund reserve can help the community plan ahead to address covering O&M adequately. If O&M costs cannot be supported by the community, it may be that the system is not viable (too small, too remote, insufficient water supply or water quality, etc.) and should be discontinued.
When	Whenever a DAC is evaluating potential improvements to their water or wastewater system.
Funding	Local Funding from the water or sewer fund of the local service provider should support O&M costs. The source of revenues is the water or sewer charge for service. Funding agencies fund an analysis of alternatives conducted in a feasibility study, and/or during the project planning phase.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.A Evaluate water and sewer rates at least every three to five years and when any major improvements are constructed, and modify as appropriate to achieve the necessary financial resources for annual operations and reserves for the next five year period. This should include development of a rate study to determine appropriate reserves and rate increases, and follow Prop 218 requirements. Typically the Prop 218 hearing will address increases for several years and, if necessary, will include increases for

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	subsequent years at a set frequency.
Lead Entity	Local water and/or wastewater providers
Why	Many community water or wastewater systems do not bring in enough revenue to offset the system expenses. This is often due to rates that were set many years ago and rarely if ever increased. Increases in regulatory requirements, system age, changes in the economy (inflation), as well as other factors necessitate an increase in rates at least every five years, if not more frequently. Additionally, any changes to the system that impact the operation and maintenance costs, should be reflected in the rates. Delaying adequate cost increases means O&M costs are not addressed, needed repairs are not made, and systems are not planning to address water capacity and/or water quality issues.
How	Develop a rate study determine appropriate reserves and rate increases, and follow Proposition 218 requirements. This will likely require the services of an engineer or other technical service provider. The California League of Cities put out a Proposition 218 Implementation guide in 2007. It may be available from the League at 1400 K St., 4 th Floor, Sacramento, CA 95814.
When	At minimum, every five years, and when any major improvements are constructed or other changes to the system that impact O&M costs.
Funding	Local service provider
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.B Each local service provider (water or wastewater) should develop a single rate structure (which may include different categories, such as residential, commercial, and industrial), and no exceptions should be made to that structure. A tiered rate structure should be developed with appropriate base rates and water usage rates to encourage conservation while ensuring sufficient revenue. Certain discounts (such as senior citizen discounts) may be employed, as long as they are consistently used and part of the written rate structure.
Lead Entity	The water or wastewater system owner
Why	The rate structures for many communities have not been updated or reviewed for many years. In addition, there are many occasions that have been discovered where special undocumented rates had been established for specific properties many years ago. There have been other instances of properties receiving service with no requirement to pay for said services.

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How	A review of the fiscal requirements to operate the water or wastewater system should be conducted annually by the owner. An equitable distribution of charges necessary to sustain the water or wastewater system is necessary so that all customers are treated in a consistent manner. The owner of the system may need to contract for the services of legal counsel and a rate structure consultant to determine an appropriate rate structure.
When	The basis for charging for water or wastewater service should be consistent and sufficient to meet system demands at all times.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	<p>13.2.2.C Seek funding to install or replace water meters. The replacement meters should be capable of being read remotely (if the system size or agreements with neighboring systems support it) to reduce labor costs.</p> <ul style="list-style-type: none">○ Consider installing same meters as neighboring community(ies) so that meter reading and billing systems can be shared.○ Develop a tiered rate structure with appropriate base rates and water usage rates to encourage conservation while ensuring sufficient revenue.
Lead Entity	Local government boards, technical assistance providers/consultants
Why	Installation of water meters is a basic and very effective method of water conservation. Metering leads to natural behavioral changes by water consumers because meters tie water use directly to household finances. Reduction in water use results in lower operating and maintenance expenses to the utility. Use of water meters also provokes the development and use of tiered rate structures, which are an excellent tool for improving overall utility finances and distributing costs over customers with different use patterns. Additionally, installing compatible meters in several locations in a given region can provide a very good opportunity for communities to enter into contractual agreements to share equipment, software, billing functions and staffing positions.

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How	Consult with a technical service provider and/or engineering consultant to determine the available funding opportunities. Water meter installation could be considered as part of a larger infrastructure project, or as a separate project.
When	Immediate and ongoing
Funding	A source of funding is the water or sewer fund of the local service provider. State agencies could redefine Category H projects (as defined by the State Revolving Fund Project Ranking Criteria) to include replacement metering projects, including meter reading equipment and necessary software. DWR could fund an ongoing Water Use Efficiency program (currently the program is funded only periodically) in which metering and re-metering projects are eligible.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.D Establish appropriate connection fees for any new connections to support the capital improvements required to provide service to those new connections.
Lead Entity	The water or wastewater system owner
Why	The water or wastewater systems are faced with capital expenditures necessary to satisfy infrastructure demands resulting from growth of the population served and from needs of the existing population (changes to regulatory requirements and the need to replace existing facilities). Connection fees are imposed as a means to collect funds from new developments to be served by the water or wastewater system. The existing water or wastewater system should not be required to assume additional capital improvement burdens imposed by new development demands upon the systems.
How	The water or wastewater system owner may conduct a review of the existing infrastructure and its relative ability to serve the existing and future demands. Capital improvements necessary to meet the demands of existing and future populations of the service area may be described and the relative capital cost of the improvements may be estimated. The relative benefit of the capital improvements for the existing and future population may be estimated. Based on the information described above, the relative connection fee per new connection may be estimated. The owner of the water or wastewater system would review the information and determine the appropriate connection fee. Proposition 218 is not applicable when establishing new connection fees. However, the fees must reasonably relate to the costs incurred by the service provider.
When	If there is not a connection fee established for the system, the owner should prepare the supporting documents and establish connection fees as soon as possible. If connection fees are established, the basis for the fees, and the fees themselves, should be reviewed at a frequency of at least every few years.

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Funding	The source of funding is the water or sewer capital improvement fund of the local service provider. The source of revenues is from developers of new residential, commercial, and industrial service connections.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.3 Provide Assistance, Training and Information	
Recommendation	13.2.3.A Develop an O&M plan that includes the types of ongoing O&M costs needed, O&M servicing and parts replacement schedule, and amount needed for O&M fund reserve to help the community plan ahead to address covering O&M adequately. This will also help identify any potential for cost savings through reduced O&M costs and explain any need for regular rate increases.
Lead Entity	The water or wastewater system owner
Why	The water or wastewater system is subject to regulatory requirements from the SWRCB, County Environmental Health Department, or RWQCB. In addition, the physical facilities require maintenance and confirmation that the facilities operate as required. An operations and maintenance plan provides the basis for the activities and procedures necessary to satisfy the regulatory and operational demands of the systems.
How	The owner of the water or wastewater system is required to have certified operators for the systems. Either the owner, operator, or a consultant may prepare the appropriate operation and maintenance plan for the system(s).
When	An operations and maintenance plan should be in place at all times.
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.A Do not allow new connections if the service capacity is not confirmed. This may require imposition of a moratorium. Developing appropriate connection fees, as recommended above, is necessary to provide a means to ensure that capacity can be made available for planned new connections.
Lead Entity	The water or wastewater system owner
Why	An existing system is responsible to provide the water and wastewater services to the properties connected to the system. The existing system would not be able to fulfill the service obligation to new connections if the capacity was not available.

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How	The owner of the water or wastewater system must know what the relative capacity and demands of the system are at all times so a determination of whether sufficient capacity is available to meet the proposed demands can be made. Establishing appropriate connection fees can help ensure capacity can be developed when necessary. If sufficient capacity is not available, and funds are not available to develop additional capacity, a moratorium on new connections should be pursued.
When	On-going
Funding	The source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.A Local service providers should attend existing grant application workshops, including CFCC Funding Fairs, and participate in other training opportunities provided through SWRCB, CWEA, CRWA, RCAC, and other resources.
Lead Entity	The water or wastewater system owner
Why	Preparing funding applications is complex and challenging, and can often be expensive due to printing costs, the need for studies, and the time invested. Developing a better understanding of the application process, and learning about resources available to help, will help communities through this process.
How	Visit the CFCC Funding Fairs website for more information on funding fairs. http://www.cfcc.ca.gov/funding_fairs.htm
When	Annually
Funding	The CFCC funding fairs are no cost. Other training opportunities should be paid for through the water or wastewater system user fees.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.B Participate in Integrated Regional Water Management Planning group meetings and consider becoming an “Interested Party” or “Member” of an IRWMP group.
Lead Entity	Water or wastewater system owner or manager
Why	Participation in local IRWM groups allow systems to understand the regional water management efforts being developed, inform those efforts with the needs of their local community, and develop joint projects to improve water quality, water supply, storm water management and flood control in each sub-basin. Disadvantaged community impacts and needs may not be adequately addressed in local management plans

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	or understood by water management and other local agencies if local disadvantaged communities do not participate. Additionally, disadvantaged communities need to participate in order to ensure specific projects are developed and funded that address their critical needs.
How	Each IRWM group has its own unique governance structure and meeting process. Community representatives should contact the group in their region to get on the email list and ask how to become members or interested parties of the group. In general, becoming a member allows you to vote on decisions made by the group. Membership may be limited to public agencies in some cases. In some cases, fees are required, although DWR states that IRWM groups cannot require payment for local stakeholders to participate. Becoming an interested party may be a good way of getting started. That formal status means that an entity has adopted and is supportive of the regional plan and its goals and objectives, and means it is a formal part of the planning group and generally invited to be part of any Advisory Board or stakeholder group meetings. Some IRWM groups only allow for formal submittal of projects by members, so interested parties can only propose projects that are formally sponsored by members.
When	Entities can join IRWM groups at any time. Contact the appropriate IRWM group to find out when the next meeting is and what the process is for becoming part of the group. It is best to join soon so that communities are able to be part of the process by the time the next funding and planning update takes place.
Funding	Each IRWM has different membership fee requirements, although all have an option for some form of formal participation that is free for disadvantaged communities. Communities should ask for technical assistance to support their ability to effectively participate in planning and project development from local IRWM groups, the Department of Water Resources (DWR), and local technical assistance providers. IRWM groups can include projects in regional applications that fund planning and project development and construction for disadvantaged communities. Under DWR's current funding guidelines for funding available to IRWMs, projects that advance critical needs in disadvantaged communities qualify for extra points and are not required to meet the same funding match and project readiness requirements as other projects. Additionally, DWR has set a goal for at least 10% of DWR's IRWM funding to fund disadvantaged community projects so local IRWMs may include DAC projects in regional applications to increase the competitiveness of funding applications.
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.A Provide the community as much information as possible and opportunity to provide input early on in the process. Local water and wastewater providers should include funding and/or staff time as part of annual and project budgets to conduct community outreach, education, consultation with community residents/users (through community meetings) in order to address barriers and lack of information and to evaluate and

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	implement recommendations identified by the users.
Lead Entity	Local water or wastewater providers or entities acting as project applicants on behalf of DACs.
Why	Communication is critical for community acceptance. Community acceptance will help implementation of the solutions and overcoming barriers. It will also help support acceptance of reasonable rate increases needed to ensure adequate service or improvements.
How	<p>How: Local providers should consider holding regular community meetings and sending out letters to consumers with updates on services and inviting them to participate in consideration of alternatives and throughout the development of major projects. The more transparent information that is available and opportunities for discussion, the more that community leaders can support informed choices and gain broad support.</p> <p>There are two primary activities to accomplish this:</p> <ul style="list-style-type: none">○ An effective communications plan. Local services providers should proactively update the community on its services and notify customers of opportunities for input on new project development. Notices should be delivered to each household and translation should be provided as needed. In most DACs, a significant percentage of the population is primarily Spanish-speaking and therefore Spanish translation should be provided for notices and at public meetings. Local service providers should consider having bilingual staff or securing a contract with a translator to regularly translate important public documents and provide interpretation at public meetings when needed. Translation should be included in job descriptions or contracts included as part of the system's annual budget.○ A responsive scope of work for project development. Local service providers should ensure that any scope of work with an engineering firm includes transparent evaluation of alternatives to minimize O&M costs, and includes the need to explain project alternatives to the community and effectively incorporate and respond to feedback. For large, complex project planning processes involving more than one community, the contracts should include subcontracts with a community facilitation team that relates well to community members, as well as engineers, and that should be included in any funding scope of work. The more board members and community members and other interested parties can be provided analysis of the pros and cons and realistic estimated costs for consumers of various alternatives, the better decision-making that can take place.
When	This is particularly important for systems when developing new projects, and is important to include within any project application scope of work. But there is also an on-going need to communicate with consumers effectively about the services being provided.
Funding	Funding for on-going regular communication should be included in the system's annual budget as part of the cost of services. However, when more intensive analysis, facilitation and communication services are needed around major project development, this can be funded by including it in the scope of work for project

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	applications, particularly within planning and pre-planning funding sources.
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.B Attempt to use in-person, phone or mail outreach to DAC residents as much as possible; email and website should be utilized, but are not sufficient on their own.
Lead Entity	Local service providers and other entities providing outreach and communication with DACs
Why	Many DAC members and representatives do not have access to internet or email. Residents of DACs can be better reached by mail, phone or through in-person outreach. Email outreach is not sufficient on its own to reach DAC stakeholders.
How	Flyers sent out with bills, door-to-door outreach, and direct mail are the most effective. Mailing lists may be obtained with the local water provider and county registrar. Consider asking local community leaders within the community to help do door to door outreach to distribute flyers or contract with other service providers that specialize in culturally appropriate outreach and community engagement. Local non-profit organizations can be used to aid in outreach efforts and updating contact information.
When	Any major outreach efforts, including notices of meetings for major project development or updates from the water or wastewater system should strive to use effective forms of communications.
Funding	These costs should be included as part of administrative budgets or outreach budgets within project development scopes of work.
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.C Expand community engagement in the development of projects. Funding to facilitate community engagement should be included in project budgets and standard approved scopes of work for project development at both the planning and construction phase. Feasibility studies funded by public funds must evaluate alternatives (including costs to end users and an evaluation of pros and cons). This information should be provided to the community at a public meeting for feedback as part of the planning process to select final alternatives for implementation. While this is typically already required to be presented during open session Board meetings, increased community engagement is recommended.
Lead Entity	Local service providers and State agencies
Why	In order to ensure that the best project alternative is developed and that there will be strong community-support to facilitate swift implementation and support any rate increases, there needs to be effective community engagement and sufficient analysis to provide for informed and transparent decision-making.

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	Opportunities for community engagement are typically required through open session Board meetings, for which agendas must be posted for the public.
How	Standard scopes of work for planning and construction phases should include community engagement, and feasibility studies should evaluate alternatives to show pros and cons and estimated resulting costs to end users.
When	During development of any proposed project.
Funding	Outreach efforts could be funded through the project funding program and/or through the water or sewer fund of the local service provider.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.B Require and actively support investment in bringing existing systems into compliance and developing long-term sustainable and affordable solutions before allowing growth and as part of permitting growth in communities where the existing water system cannot accommodate growth due to inadequate drinking or wastewater infrastructure.
Lead Entity	Local entity, County, LAFCo, State funding agencies, and Legislature.
Why	Unless a local entity water or wastewater system is in compliance with regulatory requirements and is fiscally sustainable, it is unable to provide reliable and sustainable water and wastewater services to any new connections
How	The local entity must prove the ability to provide Technical, Managerial, and Financial capabilities for a sustainable system prior to consideration of growth. County planning should require such proof prior to proceeding with consideration of new development that would rely upon the local system(s). LAFCos should also consider this within the LAFCo approval processes.
When	On-going
Funding	Local entity rate structure

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	<p>13.6.1.C In cases where there is a moratorium on connecting to a public water system, the county should not issue a permit to drill a private well on a property within the district boundary. Additionally, public water systems should consider implementing an ordinance prohibiting new well drilling within the PWS boundary and notify the county of this ordinance.</p> <p>Permitting of a private domestic well outside of the district boundary should be allowed only if the new well meets primary drinking water quality standards and will not significantly impact existing PWS. Counties should not permit a new well that does not meet standards, unless it is demonstrated that a treatment system will be installed.</p>
Lead Entity	County, local service provider
Why	Typically a water system will issue a moratorium if they have insufficient supply to serve new customers. If a landowner is then allowed to drill a new well within the district boundary it can impact the district's supply source, and may allow a path for contamination of the district's supply. In areas where water quality is an issue, issuance of a permit for a new well also allows for the homeowner to develop a new source of supply which is likely to have water quality problems.
How	Consider amending county well permitting ordinances to clarify that permits will not be issued for new private wells to be drilled within the boundaries of an existing public water system. It is important that systems implement a moratorium and notify the county of the existence of a moratorium. Existing water systems should also consider establishing an ordinance prohibiting drilling new private wells within the system boundaries (not just a moratorium on connections). Additionally, consider amending county well permitting ordinances to clarify that permitting of new domestic wells outside of water system boundaries are required to show that the new well can meet drinking water standards for commonly known contaminants in the area (or implement adequate treatment devices) and will not impact water supplies of existing users.
When	Anytime
Funding	No funding source necessary.

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13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.C Disclosure of water quality data – Require disclosure to the buyer of water quality on sale of property. In areas where there is a Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would be laboratory reports for samples collected from the private well. Recommend sampling for known and suspected contaminants in the area [See Recommendation 13.6.2.B].
Lead Entity	State Agencies, Legislature, Department of Real Estate, local water service providers, property owners
Why	A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	How: Through State Agencies, Legislature, and/or Department of Real Estate, require that water quality be disclosed upon sale of a home. For properties served by a regulated Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would require sampling and disclosure of laboratory reports indicating constituent levels and whether or not they are in exceedance of any primary water quality standards.
When	Now, ongoing
Funding	Funding for water quality sampling and disclosure will be through real estate transactions.

COUNTIES

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Counties

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.B Create a single local point of contact for local service providers and private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges.
Lead Entity	Counties and/or district offices of SWRCB could develop a single point of contact. Local service providers and private well and septic system owners can utilize existing resources at the county and State levels.
Why	Currently, it is difficult for individuals and small DACs to navigate existing requirements, resources, and opportunities. A single point of contact would allow communities or private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges more efficiently. Additionally, a single point of contact could help coordinate more effective access for other public, private and non-profit agencies (such as LAFCo, private water companies or contractors, and assistance providers) trying to provide support to address these issues. Some counties, and the SWRCB, RWQCB, and other agency websites provide forms of an information clearinghouse that are good resources for information on many water and wastewater related programs, requirements, and resources. A point of contact at the local level would help water and wastewater service providers or private well owners navigate and identify existing resources to get information related to their system issues.
How	Designating a staff person as the primary single point of contact in each local county or each district office of SWRCB would enable local water and wastewater providers or private well owners to identify appropriate websites, resources, and other information from the County Environmental Health, SWRCB, RWQCB, or other websites to access information, answer questions, obtain necessary forms, learn about training and funding opportunities, and stay aware of new regulations. The point of contact could also have recommendations on more specific contact persons on any particular topic or program that could help provide more detailed information and assistance.

¹ The recommendations contained herein are provided for general consideration by the various entities identified. The information contained herein is not intended to be and should not be construed as legal advice. Readers should seek the advice of an attorney when confronted with legal issues, and an attorney should perform an independent evaluation of the issues addressed in these materials.

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When	Ongoing.
Funding	Creation of a single point of contact would likely need to be included in county or state agency staff/operating budgets. Some funding may be able to be targeted to support this through capacity building or technical assistance set asides of the SRFs. Funding for this resource could also be developed through permit fees for local water systems, domestic well owners, septic owners, and wastewater systems as part of the support services for administration of the drinking water and/or wastewater regulatory permitting programs.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.C Consider providing regular Special District Board training opportunities, including leadership and ethics training. General legal topics may be covered, but the local service provider should seek specific legal advice from its own legal counsel.
Lead Entity	Counties
Why	Boards, in particular, may develop habits over time that may or may not be compatible with special district law. Periodic training on ethics and legal issues, as well as a place to go to ask basic questions, can help boards avoid inadvertent missteps. However, special district law can be complex and difficult for communities to comprehend, and therefore specific legal advice should be provided by an attorney hired by the water or wastewater system provider.
How	Holding periodic trainings in the physical context of government buildings can remind participants of the larger system in which they function as local government representatives. Tulare County has sponsored a series of ongoing "Government 101" trainings that have been successful. They are held on a weekday evening at the County administrative building, and dinner is provided.
When	Trainings should be held one to two times per year. Weekday evenings may work best.
Funding	Local water or wastewater service providers and counties.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	<p>13.1.3.B Establish local DAC coordinator(s) for the Tulare Lake Basin to support DAC outreach, collect updated information on DAC water and wastewater needs, help link communities to funding sources, training opportunities, and technical assistance resources, and help integrate DACs into planning processes, including IRWMPs.² Specific responsibilities could include some or all of the following:</p> <ul style="list-style-type: none"> ○ Provide outreach, communication, and capacity development with local disadvantaged communities in unincorporated areas. ○ Collect updated information on DAC water and wastewater needs and collect new information to close data gaps (i.e., TMF capacity needs, source of water where unknown in database, water supply needs, etc.). ○ Provide technical assistance to DAC water and wastewater entities who are trying to integrate their needs within IRWM and other local and regional planning efforts. ○ Work with individual DACs to determine appropriate funding programs. ○ Provide information to DACs on available training and technical assistance providers and resources, including fundraising, grant writing, fiscal management, and project management assistance. ○ Link local DACs to experts (including NGOs and private contractors) that can effectively facilitate and support locally-developed, voluntary consolidation or other forms of shared solutions and regional planning efforts by providing expertise for studies or analysis, stakeholder facilitation, as well as legal and LAFCo process assistance, with the goal of advancing the most sustainable and affordable solutions.
Lead Entity	Existing local non-profits organizations or technical assistance providers could provide DAC coordination and outreach activities. State agencies, local counties, and IRWMPs could also provide support for this position.
Why	In order to effectively and efficiently plan and implement water and wastewater solutions in the Tulare Lake Basin, where there are a large number of disadvantaged communities in unincorporated areas without safe

² This recommendation is intended to be consistent with recommendations related to the need for DAC coordinators and DAC representation provided in both the Kings Basin DAC Study and the Governor's Drinking Water Stakeholder Group's Report on New and Expanded Funding Sources.

Kings Basin DAC Study: http://www.krcd.org/pdf_ukbirwma/Kings%20Basin%20DAC%20Final%20Report.pdf

Governor's Drinking Water Stakeholder Group Report:

http://www.swrcb.ca.gov/water_issues/programs/groundwater/docs/stakeholders/8132013_2_final_rep_new_expanded_funding.pdf

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	drinking water and wastewater services, targeted assistance is needed to support coordination of DACs. Without this kind of coordination, disadvantaged communities in unincorporated areas will likely remain isolated, disjointed, and often unorganized without structural capacity and an ability to implement cost effective drinking water and wastewater solutions and effectively participate in planning or regional project development processes.
How	Given the hundreds of DACs in the TLB, ideally coordinators could be funded for each county and/or for each watershed within the TLB. Efforts to coordinate DACs locally could be organized through local DAC associations or tasks forces, although a DAC coordinator would likely be (at least initially) housed within an existing local non-profit organization. State and federal funding agencies could consider setting aside specific funding for local DAC coordinators as part of state funding program outreach and technical assistance budgets. It is noted that this would be a voluntary program for those communities interested in utilizing the services of a DAC coordinator for the potential services described above. Counties, local IRWMs and local non-profit organizations should also consider ways to provide these services or support these efforts. Local counties and IRWM groups could support this through official recognition of DAC coordinators within planning and project development processes, providing DAC update items within relevant meeting agendas, and deliberate coordination with staff and decision-making bodies with explicit intent to integrate DAC issues and support effective DAC outreach and engagement.
When	Ongoing.
Funding	State funding could be targeted through existing technical assistance set-asides, such as the SRF, through existing funding program outreach and assistance budgets, or through new bonds or funding sources. For DACs directly represented by a coordinator, the local water or wastewater provider could provide funding to support this position. Additionally, non-profit organizations could seek private sources of funding to support these activities, at least to get processes started.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.C Support the evaluation and development of a regional entity or entities to provide regional operations, management, or other services in regions that are interested in exploring such services. Efforts should begin with a small region or group of interested communities to show interest and success before considering scaling-up to any type of larger regional entity. Regional DAC operations or management services may include some or all of the following: 1) provide the organization, structure, and capacity needed to support development and funding of sustainable and affordable shared solutions, particularly for communities not currently served by centralized water and wastewater providers, 2) provide direct management and operations of existing DAC water systems when needed or requested, and 3) directly represent participating DACs in IRWM groups or other forums, when appropriate.
Lead Entity	Counties, non-profit organizations, or other regional entity (including one or more special districts). If a special district structure is used, LAFCos would need to support consolidation or creation of the new regional special district serving areas that may or may not be physically connected. This may also necessitate legislative action.
Why	Many disadvantage communities lack sufficient organization, capacity, and representation structure required to develop, implement and maintain drinking water and wastewater systems. This is particularly true of DACs without an existing centralized public water system or wastewater system, as well as systems that go into receivership, or are just not sustainable due to inadequate technical, managerial, and financial capabilities. Some DACs within smaller regions of a county have started to consider options to create different forms of unified regional entities to provide water and/or wastewater services (e.g. Northern Tulare County, Alpaugh-Allensworth area, and communities in western Fresno County). While counties and other existing water and wastewater agencies are able to support some of these functions on a case by case basis, counties and existing providers are often reluctant to take on additional responsibilities for troubled DAC systems. There is a need and interest in some areas for an entity or entities that can have the focused capacity to regionally or jointly operate systems when needed (e.g., receivership) and/or requested. Additionally, where regional entities are established, they can directly represent those DACs within local IRWMs and facilitate enabling more in-depth integration of DAC needs and projects within planning efforts and regional project development.

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How	<p>It is most feasible to begin with a smaller group of DACs voluntarily working together to establish a regional operating entity that can perform some of these functions to test such a model, show success, and build the framework and trust in such an entity. Additionally, rather than taking on all planning, project development, operation and representation functions at once, an entity could start by taking on one or two of these functions, such as operating existing entities as a receiver or taking on operations of zones of benefits from a county that no longer wants to directly provide that role. Areas to begin initial efforts, where DACs have already expressed interest in exploring a regional operation model, include the South Tulare County forum or the Northern Tulare County regional water system study efforts.</p> <p>Such an entity or organization could be housed in an existing agency or local government or non-profit organization, or be a new independent entity. LAFCOs must be involved in development of these concepts and should support consideration for allowing regional entities that may or may not be geographically contiguous or physically connected.</p>
When	Some regions are already pursuing these models and further development should be supported following the completion of this Study.
Funding	<p>The funding to start up a new entity to provide regional operations services may take some support by state funding sources. However, the funding to maintain this type of entity and fund the operations and maintenance of the entity beyond a start-up phase would need to rely entirely on funding from local rate payers and other revenues generated by the local provider. Therefore, it is important that any start up phase include developing the ability to collect fees and a sufficient economy of scale to fully sustain these services. State funding sources to support piloting small regional entities could include the Clean Up and Abatement Account, SRF Pre-Planning and Legal Entity, and IRWM funding. Future bonds or budget allocations may be able to provide funding for these activities. Additionally, pilot project funding could be pursued from private foundation sources, USEPA, or USDA for purposes tailored to meet the criteria of those funding sources. In other parts of the country, local governments, states and the federal government have funded part or all of start-up and implementation of regional water entities.</p>
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.E Consider ways to encourage and provide funding to sewer communities that rely on individual septic systems that are failing or are on inadequately sized lots.
Lead Entity	Funding agencies including the State Water Resources Control Board, USDA and possibly county agencies utilizing Community Development Block Grant funds
Why	Failing septic tanks endanger public health in a number of ways, not least by exposing humans to raw

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	sewage, and by contaminating groundwater supplies with bacteria and nitrates.
How	Conduct studies in communities that gauge the degree to which septic tanks are failing, what it costs homeowners to pump, repair and/or replace them. Conduct preliminary engineering studies that recommend a solution and develop estimated project costs and monthly sewer rates, so homeowners can make informed decisions.
When	Immediate and ongoing
Funding	State Water Board, USDA, CDBG
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.F Allow drinking water funding agencies to fund infrastructure for fire flow requirements. Where affordability or feasibility of the project is jeopardized by meeting full fire flow requirements, also allow drinking water projects to be funded for domestic purposes provided a limited level of fire flow is available. Where a viable option, the feasibility of installing a dual water distribution system to meet domestic supply and fire flow requirements, should be considered (especially where irrigation demands can be accommodated through the non-potable system used for fire flow).
Lead Entity	County Fire, County Boards of Supervisors, and funding agencies such as USDA
Why	Especially in communities where water must be treated to remove contaminants, it should be an option for utilities to choose to treat only the water that is actually consumed by people. Fire flow and outside irrigation demands can represent a significant portion of the total water demand in a given community, and requiring that fire flow is always available means that more water is being pumped and treated than is being consumed. Dual systems present one way for communities to protect public safety without building oversized treatment and potable water distribution systems. The dual system can also allow for use of untreated water for irrigation purposes, additionally reducing the system treatment requirements. In cases where a dual system is cost prohibitive, and attaining fire flow requirements through the main potable system is much too expensive to operate, allowing a reduced fire flow capacity should be considered.
How	Adjust fire codes to allow for greater flexibility in the manner in which communities meet fire flow requirements, or perhaps reducing those requirements. Provide funding (e.g., Community Facility loans and grants through USDA) to install parallel piping that is dedicated for fire flow and landscape irrigation use. Utilize existing wells that do not meet Title 22 requirements to supply the second system, when available.
When	As soon as practicable
Funding	USDA Community Facilities or Water & Wastewater loans/grants.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.A County planning departments should require any new development near an existing system (within 1-2 miles) to evaluate the feasibility of connecting to the existing system, rather than permit the creation of a new system.
Lead Entity	County Planning Departments, LAFCOs, and State Agencies
Why	Permitting development of a new water system where there is the potential to connect to an existing neighboring system perpetuates the priority issues that this Study and the recommendations herein aim to resolve. It is creating a new small system that will likely struggle to maintain sufficient TMF capacity, primarily due to lack of economy of scale, and where there are water quality issues known, this creates another system for which water quality issues will need to be resolved. On the other hand, if the new development connects with an existing system, it can help to bring that system into compliance rather than constructing a new system, it can provide improved economy of scale and additional rate payer base, it may allow access to additional resources, and it will allow for increase reliability for the system.
How	Address policy issues and permitting requirements for new systems to more actively require new development to connect with existing water and wastewater systems where feasible. County Planning Departments may not necessarily have the legal authority to require the existing system to make the connection. However, they can and should recommend that the property to be developed be annexed. LAFCOs should also consider this within the LAFCo approval processes.
When	Any time new development is proposed.
Funding	County, SWRCB
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.B Require and actively support investment in bringing existing systems into compliance and developing long-term sustainable and affordable solutions before allowing growth and as part of permitting growth in communities where the existing water system cannot accommodate growth due to inadequate drinking or wastewater infrastructure.
Lead Entity	Local entity, County, LAFCo, State funding agencies, and Legislature.
Why	Unless a local entity water or wastewater system is in compliance with regulatory requirements and is fiscally sustainable, it is unable to provide reliable and sustainable water and wastewater services to any new connections

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How	The local entity must prove the ability to provide Technical, Managerial, and Financial capabilities for a sustainable system prior to consideration of growth. County planning should require such proof prior to proceeding with consideration of new development that would rely upon the local system(s). LAFCOs should also consider this within the LAFCo approval processes.
When	Ongoing
Funding	Local entity rate structure
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.C In cases where there is a moratorium on connecting to a public water system, the county should not issue a permit to drill a private well on a property within the district boundary. Additionally, public water systems should consider implementing an ordinance prohibiting new well drilling within the PWS boundary and notify the county of this ordinance. Permitting of a private domestic well outside of the district boundary should be allowed only if the new well meets primary drinking water quality standards and will not significantly impact existing PWS. Counties should not permit a new well that does not meet standards, unless it is demonstrated that a treatment system will be installed.
Lead Entity	County, local service provider
Why	Typically a water system will issue a moratorium if they have insufficient supply to serve new customers. If a landowner is then allowed to drill a new well within the district boundary it can impact the district's supply source, and may allow a path for contamination of the district's supply. In areas where water quality is an issue, issuance of a permit for a new well also allows for the homeowner to develop a new source of supply which is likely to have water quality problems.
How	Consider amending county well permitting ordinances to clarify that permits will not be issued for new private wells to be drilled within the boundaries of an existing public water system. It is important that systems implement a moratorium and notify the county of the existence of a moratorium. Existing water systems should also consider establishing an ordinance prohibiting drilling new private wells within the system boundaries (not just a moratorium on connections). Additionally, consider amending county well permitting ordinances to clarify that permitting of new domestic wells outside of water system boundaries are required to show that the new well can meet drinking water standards for commonly known contaminants in the area (or implement adequate treatment devices) and will not impact water supplies of existing users.
When	Anytime
Funding	No funding source necessary.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.D In areas where there is no existing water system infrastructure available, building permits should only be issued if adequate supply and quality from a private well is confirmed to be available. This may include installation of a viable treatment system (POU or POE) with acceptable maintenance service.
Lead Entity	Counties, Legislature
Why	Issuance of a permit to build a home on a property where there is not existing water system infrastructure available, and where the supply and quality available from a private well are not confirmed to be sufficient, puts the homeowner or tenant at risk of having a water supply that does not meet water quality standards and/or water supply that may be insufficient.
How	Require an analysis of water supply prior to issuing a building permit. In areas of known groundwater contamination (high levels of primary constituents), counties should not zone for residential building.
When	Now, ongoing
Funding	No funding necessary.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.E Provide enforcement action when people do not obtain a permit for drilling of a new well or installation of an onsite wastewater system.
Lead Entity	County
Why	It has been noted that some property owners have drilled a private well and/or installed a septic system without a permit from the county. This poses a health risk for the well user in addition to neighboring well owners whose well could be contaminated by an improperly constructed well or septic system.
How	To be determined at county level. Enforcement action may include fines and/or shutting down the well.
When	Soon, ongoing.
Funding	Counties.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.A All counties shall identify areas where new growth should be directed based on the existence of public water and sewer governance and infrastructure. Counties shall only zone for residential development where there is safe and reliable water, except in situations where there are viable plans to provide safe and

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	reliable drinking water, and additional growth will create more economy of scale and bring a greater rate payer base that will allow for a solution to be sustained. <i>Note: this is not intended to limit the ability to create infrastructure in existing communities that currently rely on private wells or septic systems; rather, this recommendation is intended to limit growth in areas that do not have sufficient governance and infrastructure to accommodate such growth.</i>
Lead Entity	County Planning Department and LAFCos
Why	The proliferation of small water systems that lack economy of scale and proper technical, managerial, and financial capacity is a large part of the problem faced by communities in the Study Area. By encouraging growth around existing public water and sewer systems and discouraging growth in other areas, this problem can be minimized in the future. However, it is important to confirm the capacity of the existing systems prior to zoning for residential development that would rely on those systems. Implying the potential for growth in areas that do not have proven safe and reliable water supply sources is not exercising due diligence in land use planning.
How	Planning documents should account for existing infrastructure and governance structures that are available when zoning for residential land use. When growth is encouraged near (within 3-5 miles) existing public systems through planning documents, those systems potentially impacted should be notified. Counties should require proof of the existence or reasonable capability to provide safe and reliable water supply to an area prior to defining land uses or zoning for potential land uses in areas within the county. LAFCos should also consider this within LAFCo approval processes. Where this would require re-zoning of areas, legal counsel should be consulted to make sure property rights of owners are not being infringed upon.
When	Now and any time planning documents are reviewed and updated.
Funding	County Planning Department
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.A Tulare County should continue to update and maintain the database that was developed through this Study. Local data stewards from each of the other three counties (Fresno, Kern, and Kings) should be established to assist in the quality control of the data collected for each respective county. The uses of this database could be many, but the primary purpose would be to track improvements to the water supply quality and reliability in the Study Area.
Lead Entity	Tulare County (Lead), Fresno, Kern, and Kings Counties (local data stewards)
Why	The uses of this database could be many, but the primary purpose would be to track water quality and supply issues in the Study Area, as well as changes overtime (improvements in the conditions, or otherwise). It is noted that at present there are many communities with an unknown source of water.

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How	Data will be maintained by Tulare County and updated on approximately an annual basis.
When	Current and ongoing
Funding	Tulare County
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.B Tulare County should track progress with respect to the priority issues identified in this Study. Monitor and measure the success of improving the circumstances of DAC water and wastewater systems through implementation of recommendations, relative condition of drinking water supplies, and condition of wastewater service. This could be done in coordination with the SOAC, if the SOAC is continued as recommended.
Lead Entity	Tulare County (Lead), Fresno, Kern, and Kings Counties (local data stewards)
Why	To monitor and measure the success of this Study through implementation of recommendations, based on relative condition of drinking water supplies and wastewater service.
How	The website that will host the data is currently being developed. Data will be maintained by Tulare County and updated on approximately an annual basis. Statistics related to the number of water quality issues, water supply issues, wastewater treatment and disposal issues, and other factors can be compared and charted to monitor progress.
When	Ongoing
Funding	Tulare County, and other local and State agencies
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.1 Improve Data Collection	
Recommendation	13.7.1.C Improve the County Environmental Health Department responsibilities, fee authorities, and requirements to permit and monitor on-site systems. (There was a frequent observation that records for on-site systems were non-existent – i.e. Plainview, Rodriquez Labor Camp). Improve data collection, reporting, and management for private domestic wells, State Small Systems and septic systems so that the water supply and onsite wastewater conditions can be better documented and understood. Local counties or state agencies should maintain a database of information related to private wells and septic systems, including the location, size, condition, and depth of facilities. This database should be created to include all new individual wells and septic systems, as well as any modifications to existing facilities that are requested. Eventually the goal should be to include data on existing facilities, however it is understood that the effort to collect and report data on existing facilities would take years to complete.

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Lead Entity	County Environmental Health Departments
Why	<p>It is apparent that there are many private, on-site water and wastewater systems with non-existent or insufficient records of the facilities. The lack of records includes topics such as design capacity, on-site sustainability, inspections, and records of “as-constructed” facilities. The lack of records impacts the ability to evaluate adequacy of existing systems and impacts the ability to develop new community systems in areas that are served by on-site systems.</p> <p>In order to ensure private well and septic systems are adequate to provide safe drinking water and protect local water quality and public health, counties maintain local ordinances and implement permitting programs. A database could provide more efficient and accurate means of ensuring that local facilities are protective of public health and meeting all requirements, and could be used to inform ongoing planning, permitting and code enforcement activities. Specifically, it is important to understand the physical location, depth and design of facilities so that 1) the county can confirm sufficient separation between facilities is available, 2) the property owner is knowledgeable when facilities need to be maintained, fixed, or replaced, and 3) in the case that a new water or sewer system is being considered, the county and/or engineers can understand the location of facilities during the feasibility analysis.</p>
How	The building permit process must include complete records regarding proposed and “as-constructed” on-site water and wastewater systems.
When	Now, ongoing
Funding	Well drilling and onsite wastewater permit fees. Current county permit fees for these activities should be re-evaluated to ensure they are adequate to meet administrative costs for an effective permitting program.

INTEGRATED REGIONAL WATER MANAGEMENT GROUPS

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Integrated Regional Water Management Groups

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.D Continue to convene a DAC focused stakeholder group for the Tulare Lake Basin, and expand outreach and engagement to further enhance DAC, County, IRWM, and other local stakeholder engagement and participation. Expanded outreach and engagement efforts should educate local board members, operators, and residents on local water and wastewater challenges and priority issues, as well as resources that are available, including findings and recommendations developed through this Study and existing resources from technical assistance providers. Continuation of stakeholder meetings should occur at least quarterly to track progress on the recommendations of this Study and provide updates on new program, challenges, resources or opportunities.
Lead Entity	The stakeholders that have participated in the Tulare Lake Basin Disadvantaged Community Water Study (particularly those in the SOAC), including state agencies, counties, IRWMs, DAC representatives, and non-profit organizations.
Why	Local DAC stakeholders have found it to be valuable to come together on a regular basis to discuss local DAC issues, opportunities and programs, and reflect on recommendations through this multi-year Study process. The SOAC recommended that the group continue to meet quarterly to track progress on the recommendations of this Study, as well as engage more extensive DAC stakeholders through a local follow-up outreach and engagement campaign. Expanded outreach and engagement would help enable local systems to utilize tools and lessons learned through this Study, as well as other existing resources, and develop appropriate solutions. This would help ensure that this Study is more than just a report, but will actually be accessed by communities and help to develop long-term sustainable solutions to local water and wastewater challenges.

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How	This would be best accomplished through continuation of the SOAC process through a coordinated effort with all the stakeholders, counties, organizations and agencies that have participated in the Tulare Lake Basin Disadvantaged Community Water Study. Some funding would be needed to 1) have a coordinating entity continue to facilitate these groups and invite representatives to participate in local stakeholder meetings, and 2) support planning and implementation of expanded outreach and engagement throughout the Basin. Participation from local disadvantaged communities, counties, non-profits and funding agencies directly in the outreach and engagement would help make these efforts more effective by lending credibility, resources, and reliability through personal connections from communities in similar situations.
When	Following completion of this Study, meet quarterly and identify a plan and funding to expand outreach and engagement to additional stakeholders in the Basin.
Funding	Counties could fund continuation of quarterly meetings of the SOAC. Additionally, the group could approach state or federal funding agencies about funding for a coordinating entity (a non-profit or local agency) to coordinate an expanded outreach, education, and engagement campaign to follow up after this Study has ended. Local non-profits could approach private and public funding sources to support these efforts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	<p>13.1.3.B Establish local DAC coordinator(s) for the Tulare Lake Basin to support DAC outreach, collect updated information on DAC water and wastewater needs, help link communities to funding sources, training opportunities, and technical assistance resources, and help integrate DACs into planning processes, including IRWMPs.² Specific responsibilities could include some or all of the following:</p> <ul style="list-style-type: none"> ○ Provide outreach, communication, and capacity development with local disadvantaged communities in unincorporated areas. ○ Collect updated information on DAC water and wastewater needs and collect new information to close data gaps (i.e., TMF capacity needs, source of water where unknown in database, water supply needs, etc.). ○ Provide technical assistance to DAC water and wastewater entities who are trying to integrate their needs within IRWM and other local and regional planning efforts.

² This recommendation is intended to be consistent with recommendations related to the need for DAC coordinators and DAC representation provided in both the Kings Basin DAC Study and the Governor's Drinking Water Stakeholder Group's Report on New and Expanded Funding Sources.

Kings Basin DAC Study: http://www.krce.org/pdf_ukbirwma/Kings%20Basin%20DAC%20Final%20Report.pdf

Governor's Drinking Water Stakeholder Group Report:

http://www.swrcb.ca.gov/water_issues/programs/groundwater/docs/stakeholders/8132013_2_final_rep_new_expanded_funding.pdf

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	<ul style="list-style-type: none"> ○ Work with individual DACs to determine appropriate funding programs. ○ Provide information to DACs on available training and technical assistance providers and resources, including fundraising, grant writing, fiscal management, and project management assistance. ○ Link local DACs to experts (including NGOs and private contractors) that can effectively facilitate and support locally-developed, voluntary consolidation or other forms of shared solutions and regional planning efforts by providing expertise for studies or analysis, stakeholder facilitation, as well as legal and LAFCo process assistance, with the goal of advancing the most sustainable and affordable solutions.
Lead Entity	Existing local non-profits organizations or technical assistance providers could provide DAC coordination and outreach activities. State agencies, local counties, and IRWMs could also provide support for this position.
Why	In order to effectively and efficiently plan and implement water and wastewater solutions in the Tulare Lake Basin, where there are a large number of disadvantaged communities in unincorporated areas without safe drinking water and wastewater services, targeted assistance is needed to support coordination of DACs. Without this kind of coordination, disadvantaged communities in unincorporated areas will likely remain isolated, disjointed, and often unorganized without structural capacity and an ability to implement cost effective drinking water and wastewater solutions and effectively participate in planning or regional project development processes.
How	Given the hundreds of DACs in the TLB, ideally coordinators could be funded for each county and/or for each watershed within the TLB. Efforts to coordinate DACs locally could be organized through local DAC associations or tasks forces, although a DAC coordinator would likely be (at least initially) housed within an existing local non-profit organization. State and federal funding agencies could consider setting aside specific funding for local DAC coordinators as part of state funding program outreach and technical assistance budgets. It is noted that this would be a voluntary program for those communities interested in utilizing the services of a DAC coordinator for the potential services described above. Counties, local IRWMs and local non-profit organizations should also consider ways to provide these services or support these efforts. Local counties and IRWM groups could support this through official recognition of DAC coordinators within planning and project development processes, providing DAC update items within relevant meeting agendas, and deliberate coordination with staff and decision-making bodies with explicit intent to integrate DAC issues and support effective DAC outreach and engagement.
When	Ongoing.
Funding	State funding could be targeted through existing technical assistance set-asides, such as the SRF, through existing funding program outreach and assistance budgets, or through new bonds or funding sources. For

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	DACs directly represented by a coordinator, the local water or wastewater provider could provide funding to support this position. Additionally, non-profit organizations could seek private sources of funding to support these activities, at least to get processes started.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.C IRWM groups should consider organizing pre-application and grant application workshops or training opportunities for DACs that are “Interested Parties” or “Members” of the IRWM group, as well as prepare and distribute outreach and educational materials to those DACs as funding from DWR is made available.
Lead Entity	IRWM groups
Why	<p>Local IRWM groups benefit from engagement of DACs within IRWMs and development of DAC projects as part of integrated regional water management planning and project development applications. 10% of IRWM funding is aimed to be used for DAC projects. Additionally, IRWM applications receive additional points in scoring and cost waivers if projects to address critical water needs in DACs are included.</p> <p>Additionally, IRWM plans were created to address priority water needs in the region, which include disadvantaged community needs, particularly in the Tulare Lake Basin. If these plans and the projects to implement the plans are not addressing disadvantaged community needs, they are not accomplishing their goals and not adequately accomplishing the mission of IRWMs and the funding source. Because of that, each region should proactively encourage and facilitate effective inclusion of DAC needs and projects within IRWM planning and project application processes.</p> <p>Local IRWMs in the region have already taken many steps to do this, and this recommendation is to continue as well as expand these efforts to do more formal, extensive and timely outreach, training, workshops and technical assistance with each funding round.</p>
How	IRWM groups can organize formal and timely workshops and trainings specifically aimed at providing information and answering questions and supporting integration of DAC needs and projects for each round of DWR funding and plan updates. It would be most useful to invite the local DWR IRWM representative to also be present for these meetings in order to be able to answer any questions that may arise. Outreach and facilitation of these meetings would be done more effectively in partnership with local community-based nonprofits and technical assistance providers. The database of DACs and outreach contact lists developed for this TLB DAC Study should be integrated into each IRWM group’s database and used for planning, communication and outreach efforts.
When	This should be conducted enough in advance to allow for preparation and submission of projects within the IRWM application timeline, as well as any regular plan updates.

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Funding	The costs of hosting meetings and outreach could be funded as part of administrative staff costs of IRWM groups, and could also be included in any applications for planning and technical assistance grants through State agencies.
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STATE AGENCIES

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

State Agencies

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.1 Enhance Internal Awareness	
Recommendation	13.1.1.D. Consider adding requirement for more frequent or comprehensive and standardized assessment of TMF capacity for local water and wastewater providers, as well as updating regulatory and permit requirements for water and wastewater systems to clarify that it must meet TMF requirements to maintain permit to operate.
Lead Entity	State Agencies and Local Primacy Agencies
Why	There is a lack of comprehensive information and standardized indicators of water and wastewater providers to assess TMF capacity. Additionally, Federal and state statute enables the SWRCB Division of Drinking Water to require a demonstration of TMF capacity only (1) on formation of a new public water system; (2) on change of ownership of a public water system; or (3) when state funding is provided to a public water system through one of its three funding sources. SWRCB can recommend TMF assessments at other times and has been able to require specific TMF demonstrations through some enforcement actions, however a clearer requirement that systems must meet TMF requirements and a standardized assessment would drastically improve the ability to enforce these requirements and ensure more universal compliance. Also, note that wastewater system permittees are not required to provide a demonstration of TMF capacity under the SWRCB permits so this should be added to permits. This information would also be useful for LAFCos conducting municipal services reviews and should be integrated into that process, as available and appropriate.
How	The State Water Board should update its permitting guidelines and initiate rule making processes as appropriate to clarify these requirements and provide standardized assessments and indicators. These indicators could then be applied through the annual inspection process and reported to the regulating entity annually through the sanitary assessments. Permit requirements for individual permits could be added as

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	they are renewed, if a general rulemaking is not feasible. Resources and enforcement could be used in tandem to bring systems into compliance. It is important that enforcement not be used to penalize a system that is in-capable of correcting the problem without providing assistance to build TMF capacity. Assistance could be in the form of training, technical assistance, and funding assistance to assess joint solutions or supporting forms of consolidation to build TMF capacity.
When	The sooner this is conducted, the easier it will be to ensure all systems meet TMF requirements and target resources and enforcement to those systems that are unable or unwilling to comply.
Funding	Funding at the State level would be needed to enact new guidance and undertake rulemaking and added time for annual assessments.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.B Create a single local point of contact for local service providers and private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges.
Lead Entity	Counties and/or district offices of SWRCB could develop a single point of contact. Local service providers and private well and septic system owners can utilize existing resources at the county and State levels.
Why	Currently, it is difficult for individuals and small DACs to navigate existing requirements, resources, and opportunities. A single point of contact would allow communities or private well owners to obtain information and access resources to provide guidance related to water and wastewater challenges more efficiently. Additionally, a single point of contact could help coordinate more effective access for other public, private and non-profit agencies (such as LAFCo, private water companies or contractors, and assistance providers) trying to provide support to address these issues. Some counties, and the SWRCB, RWQCB, and other agency websites provide forms of an information clearinghouse that are good resources for information on many water and wastewater related programs, requirements, and resources. A point of contact at the local level would help water and wastewater service providers or private well owners navigate and identify existing resources to get information related to their system issues.

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How	Designating a staff person as the primary single point of contact in each local county or each district office of SWRCB would enable local water and wastewater providers or private well owners to identify appropriate websites, resources, and other information from the County Environmental Health, SWRCB, RWQCB, or other websites to access information, answer questions, obtain necessary forms, learn about training and funding opportunities, and stay aware of new regulations. The point of contact could also have recommendations on more specific contact persons on any particular topic or program that could help provide more detailed information and assistance.
When	Ongoing
Funding	Creation of a single point of contact would likely need to be included in county or state agency staff/operating budgets. Some funding may be able to be targeted to support this through capacity building or technical assistance set asides of the SRFs. Funding for this resource could also be developed through permit fees for local water systems, domestic well owners, septic owners, and wastewater systems as part of the support services for administration of the drinking water and/or wastewater regulatory permitting programs.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.D Continue to convene a DAC focused stakeholder group for the Tulare Lake Basin, and expand outreach and engagement to further enhance DAC, County, IRWM, and other local stakeholder engagement and participation. Expanded outreach and engagement efforts should educate local board members, operators, and residents on local water and wastewater challenges and priority issues, as well as resources that are available, including findings and recommendations developed through this Study and existing resources from technical assistance providers. Continuation of stakeholder meetings should occur at least quarterly to track progress on the recommendations of this Study and provide updates on new program, challenges, resources or opportunities.
Lead Entity	The stakeholders that have participated in the Tulare Lake Basin Disadvantaged Community Water Study (particularly those in the SOAC), including state agencies, counties, IRWMs, DAC representatives, and non-profit organizations.
Why	Local DAC stakeholders have found it to be valuable to come together on a regular basis to discuss local DAC issues, opportunities and programs, and reflect on recommendations through this multi-year Study process. The SOAC recommended that the group continue to meet quarterly to track progress on the recommendations of this Study, as well as engage more extensive DAC stakeholders through a local follow-up outreach and engagement campaign. Expanded outreach and engagement would help enable local systems to utilize tools and lessons learned through this Study, as well as other existing resources, and develop appropriate solutions. This would help ensure that this Study is more than just a report, but will

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	actually be accessed by communities and help to develop long-term sustainable solutions to local water and wastewater challenges.
How	This would be best accomplished through continuation of the SOAC process through a coordinated effort with all the stakeholders, counties, organizations and agencies that have participated in the Tulare Lake Basin Disadvantaged Community Water Study. Some funding would be needed to 1) have a coordinating entity continue to facilitate these groups and invite representatives to participate in local stakeholder meetings, and 2) support planning and implementation of expanded outreach and engagement throughout the Basin. Participation from local disadvantaged communities, counties, non-profits and funding agencies directly in the outreach and engagement would help make these efforts more effective by lending credibility, resources, and reliability through personal connections from communities in similar situations.
When	Following completion of this Study, meet quarterly and identify a plan and funding to expand outreach and engagement to additional stakeholders in the Basin.
Funding	Counties could fund continuation of quarterly meetings of the SOAC. Additionally, the group could approach state or federal funding agencies about funding for a coordinating entity (a non-profit or local agency) to coordinate an expanded outreach, education, and engagement campaign to follow up after this Study has ended. Local non-profits could approach private and public funding sources to support these efforts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.E Target existing technical assistance training programs to specific communities who have shown a need and interest, to focus on their needs and provide locally available and specialized training programs.
Lead Entity	State Agencies and technical assistance providers (RCAC, SHE, etc.)
Why	Local, targeted trainings are more effective because they are more accessible to rural communities, and can be tailored to meet the unique needs identified by water and wastewater system representatives. There is an additional benefit to bringing local water and wastewater system representatives together so they can network and learn from each other.
How	SWRCB (Division of Drinking Water) in coordination with Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) will be providing targeted board training for several communities in the Study Area. This initial effort can inform how a program can be expanded, improved and continued to other targeted groups of communities. SWRCB staff and technical assistance providers should work together to identify target communities. A local venue would be identified and invitations extended to water system representatives, including board, staff and operators.

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When	Quarterly or biannually, in different locations. Follow-up trainings could be scheduled as needed, depending on response.
Funding	State Water Resources Control Board technical assistance funding through the SRF set aside, or current or future bond funding.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.F Improve the operator certification process by providing more frequent testing, and offering certification tests in more locations.
Lead Entity	SWRCB Operator Certification Programs
Why	Operator certification is challenging for people in remote areas and for those without English language skills. Training opportunities are limited, testing sites are distant, and the exams are offered only in English. Sometimes valued staff members are lost because they cannot achieve a basic distribution operator certification, despite adequate skills and long experience. Particularly for lower-level certifications, such as water distribution or treatment certification level D-1 or T-1, or wastewater operator Grade I, the need for accessibility and affordability of certification programs may outweigh other precautions. Currently, drinking water treatment and distribution system operator exams are only offered in eight locations throughout the State, including one location (Fresno) within the Tulare Lake Basin Study Area. Each distribution and treatment certification test is offered two times per year. Similarly, wastewater treatment plant operator certification exams are currently held two times per year, with only one exam location in the Tulare Lake Basin (Fresno).
How	Provide opportunities for examinations in more locations, on a more frequent basis. Consider providing exams in at least three locations throughout the Tulare Lake Basin (for example, Fresno, Visalia, and Bakersfield). Also consider remote testing that could be done online, possibly from local libraries. Consider making examinations available in Spanish or other dominant languages, at least for lower-level certifications that do not require English literacy to perform relevant duties. Note that regulatory documents are in English only, and therefore this may not be a feasible consideration.
When	Exams should be offered quarterly.
Funding	SWRCB Operator Certification Programs.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.A Even outside of larger infrastructure project development processes, alternatives such as sharing common resources, forming joint governmental agencies, or other forms of consolidation should be evaluated to determine if O&M costs could be reduced or TMF capacity improved.
Lead Entity	Local water and wastewater providers and entities developing applications for improvements to disadvantaged community water and wastewater systems should examine these alternatives. Also, state and federal funding agencies should support examination of these alternatives within the scope of work of public funding agreements
Why	For some areas, a sustainable and affordable solution could be made possible through some form of regional or shared solution that would allow communities to share ownership and operation of water infrastructure as well as create a sizable enough funding base of rate payers to have a sufficient economy of scale for operations and maintenance. Local agencies should examine the full range of alternatives and evaluate how costs may be able to be reduced through shared solutions in order to address immediate and long-term operations and maintenance funding and TMF capacity challenges.
How	Water and wastewater providers should ask local district engineers to examine these alternatives, and should seek out contractors and engineers that have experience with this kind of analysis and have proven experience in successfully developing these kinds of solutions. A third party entity, such as a county, non-profit or other group could also develop an analysis of alternatives with a number of communities jointly. However, in all cases analysis should be transparent and community-driven, allowing the community to understand and provide input into the pros and cons and real O&M costs of alternatives.
When	It is easiest to do this as part of funding applications for feasibility studies when solutions are being developed because there are funding sources available to cover the costs of providing these types of analysis. However, similar analysis should be discussed with local district engineers outside of larger capital project development as well.
Funding	The primary source of funding is the water or sewer fund of the local service provider. The source of revenues is the water or sewer charge for service. Sources of external funding for this may include the new pre-planning entity formation set aside as part of the SDWSRF. However, all feasibility study planning funding from the state or federal funding sources should include this kind of analysis. In addition, IRWM funding could support this, as well as sustainable community planning funding grants.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	<p>13.1.3.B Establish local DAC coordinator(s) for the Tulare Lake Basin to support DAC outreach, collect updated information on DAC water and wastewater needs, help link communities to funding sources, training opportunities, and technical assistance resources, and help integrate DACs into planning processes, including IRWMPs.² Specific responsibilities could include some or all of the following:</p> <ul style="list-style-type: none">○ Provide outreach, communication, and capacity development with local disadvantaged communities in unincorporated areas.○ Collect updated information on DAC water and wastewater needs and collect new information to close data gaps (i.e., TMF capacity needs, source of water where unknown in database, water supply needs, etc.).○ Provide technical assistance to DAC water and wastewater entities who are trying to integrate their needs within IRWM and other local and regional planning efforts.○ Work with individual DACs to determine appropriate funding programs.○ Provide information to DACs on available training and technical assistance providers and resources, including fundraising, grant writing, fiscal management, and project management assistance.○ Link local DACs to experts (including NGOs and private contractors) that can effectively facilitate and support locally-developed, voluntary consolidation or other forms of shared solutions and regional planning efforts by providing expertise for studies or analysis, stakeholder facilitation, as well as legal and LAFCo process assistance, with the goal of advancing the most sustainable and affordable solutions.
Lead Entity	Existing local non-profits organizations or technical assistance providers could provide DAC coordination and outreach activities. State agencies, local counties, and IRWMPs could also provide support for this position.
Why	In order to effectively and efficiently plan and implement water and wastewater solutions in the Tulare Lake Basin, where there are a large number of disadvantaged communities in unincorporated areas without safe

² This recommendation is intended to be consistent with recommendations related to the need for DAC coordinators and DAC representation provided in both the Kings Basin DAC Study and the Governor's Drinking Water Stakeholder Group's Report on New and Expanded Funding Sources.

Kings Basin DAC Study: http://www.krcd.org/pdf_ukbirwma/Kings%20Basin%20DAC%20Final%20Report.pdf

Governor's Drinking Water Stakeholder Group Report:

http://www.swrcb.ca.gov/water_issues/programs/groundwater/docs/stakeholders/8132013_2_final_rep_new_expanded_funding.pdf

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	drinking water and wastewater services, targeted assistance is needed to support coordination of DACs. Without this kind of coordination, disadvantaged communities in unincorporated areas will likely remain isolated, disjointed, and often unorganized without structural capacity and an ability to implement cost effective drinking water and wastewater solutions and effectively participate in planning or regional project development processes.
How	Given the hundreds of DACs in the TLB, ideally coordinators could be funded for each county and/or for each watershed within the TLB. Efforts to coordinate DACs locally could be organized through local DAC associations or task forces, although a DAC coordinator would likely be (at least initially) housed within an existing local non-profit organization. State and federal funding agencies could consider setting aside specific funding for local DAC coordinators as part of state funding program outreach and technical assistance budgets. It is noted that this would be a voluntary program for those communities interested in utilizing the services of a DAC coordinator for the potential services described above. Counties, local IRWMs and local non-profit organizations should also consider ways to provide these services or support these efforts. Local counties and IRWM groups could support this through official recognition of DAC coordinators within planning and project development processes, providing DAC update items within relevant meeting agendas, and deliberate coordination with staff and decision-making bodies with explicit intent to integrate DAC issues and support effective DAC outreach and engagement.
When	Ongoing
Funding	State funding could be targeted through existing technical assistance set-asides, such as the SRF, through existing funding program outreach and assistance budgets, or through new bonds or funding sources. For DACs directly represented by a coordinator, the local water or wastewater provider could provide funding to support this position. Additionally, non-profit organizations could seek private sources of funding to support these activities, at least to get processes started.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.C Consider providing increased funding for capital improvements for water (or wastewater) related projects when it would allow for reduced O&M costs over the long term. For example, construction of dual water systems for DACs with poor distribution systems or high non-potable water demand.
Lead Entity	State and Federal funding agencies
Why	Grant funding for DACs is currently capped at \$5 million for capital costs (for Prop 84 funding). O&M costs must be paid by the system customers. There may be instances when a capital cost greater than \$5 million may provide a DAC with less O&M costs compared to an improvement with a capital cost less than \$5

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	million. For example, a dual water system would allow the DAC to treat a smaller volume of potable water resulting in lower on going O&M costs. Other funding sources such as SRF and USDA are available, which typically have loan components.
How	Consider allowing DACs to obtain grant funding for capital costs greater than \$5 million if the higher capital costs solution will lower ongoing O&M costs. An evaluation to determine appropriate levels of funding and qualifications would need to be done prior to increasing current funding limits.
When	When considering new funding programs or funding program updates.
Funding	Local funds, State legislature, SWRCB
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.D Support the development and implementation of water conservation policies/measures by providing incentives and technical assistance to DACs and promoting the use of energy efficient equipment upgrades, such as energy-efficient or solar powered pumps.
Lead Entity	State Agencies
Why	Water systems that implement water conservation techniques and bill their customers based on water used will use less water. Less water used will mean less water needing treatment that will result in lower O&M costs. Energy efficient upgrades to pumps and other large electrical consumption equipment will lower electrical costs to the water system.
How	Provide incentives for water systems to install water meters and implement water conservation policies, and measure their effectiveness. Energy companies can provide incentives in the manner of rebates or funding for water systems to install more energy efficient equipment.
When	Now for water conservation measures. When existing pumps or electrical equipment is due for replacement for energy efficient upgrades.
Funding	Local funding, State legislature, SWRCB/RWQCB, energy companies

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.E Consider establishing a transitional funding program to assist with O&M costs on a temporary basis.
Lead Entity	State agencies and the legislature
Why	At the state level there is a need for a targeted and coordinated funding program with the clear goal of transitioning small disadvantaged communities in unincorporated areas without safe drinking water (including those communities with and without existing public water systems) to achieve, self-sustaining, affordable drinking water systems.
How	<p>This newly targeted program should specifically include funding for the following:</p> <ul style="list-style-type: none">✓ Technical Assistance for both 1) project application and project operation and management (currently eligible under SWRCB Division of Drinking Water funding but not DWR IRWM funding), and 2) leadership and capacity training;✓ A pooled capital reserve fund, which can cover both short-term financing costs and help lower O&M costs; and✓ Some O&M subsidies for an initial period of time until long-term solutions are implemented and self-sustaining. <p>As a “transitional” program, the associated funding should be limited to supporting the transition of existing disadvantaged communities into self-sustaining systems that can achieve compliance with the applicable regulatory requirements and ensure affordable rates. The program should not be a long-term, ongoing financial support mechanism. As such, a disadvantaged community’s participation in a transitional funding program should have conditions and incentives to ensure it is meeting certain objectives and milestones in a timely manner. In particular, at minimum state agencies should require and provide TMF training and improvements as a condition of receiving this O&M funding.</p>
When	This should be considered as part of the IUP process, state budget and legislative process, and within the creation or appropriation of new funding sources, including the new water bond.
Funding	Such an effort would need to include targeting significant amounts of existing funding sources, and will need new and additional funding sources to adequately address the needs and gaps identified above. The modified Water Bond should include significant funding for this effort. It may be possible to create a set aside in the SRF Intended Use Plan (IUP) for some or all of this purpose, as well as utilizing the Clean Up and Abatement Account and IRWMPs for at least some of these purposes. If a statewide or other scale of water user fee were established, part of it could be used for this purpose. Funding for ongoing O&M costs should

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	be from the water or sewer fund supported by local users through water or sewer rates.
13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.3 Provide Assistance, Training and Information	
Recommendation	13.2.3.B Continue to provide, expand, and better publicize technical assistance training on developing rate studies and establishing rate policies, which should also include guidance on conducting a Prop 218 hearing. This type of assistance is currently available for disadvantaged communities from SWRCB technical assistance providers.
Lead Entity	State Agencies, Technical Assistance providers
Why	The Prop 218 process in California is complicated and nuanced. Many legal questions remain unanswered, even after almost twenty years. Many questions arise during a Prop 218 process, and can therefore become very expensive due to extensive legal consultation. The more training that Boards and staff receive before embarking on a Prop 218 rate change, the more adept they will be at navigating the process and avoiding pitfalls. The availability of State agencies or other technical service providers for assistance during the process would be very useful to many small districts that do not retain regular counsel, however this does not dismiss the need for legal counsel. The local entity should hire an attorney for specific guidance through this process.
How	Holding periodic trainings in the physical context of government buildings can remind participants of the larger system in which they function as local government representatives. On the other hand, it might be most impactful to hold a training related to developing a rate study and conducting a Prop 218 hearing in particular communities, scheduled to precede a planned rate change.
When	Trainings should be held one to two times per year. Weekday evenings may work best.
Funding	Local funding, state agencies, or technical assistance funds already available could be used for this purpose.
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.C Improve Groundwater Management Planning to address both declining water levels and increased water quality contaminant levels, and evaluate ways the two trends may be exacerbating each other.
Lead Entity	Department of Water Resources and local water agencies.
Why	Groundwater levels within many areas of the Tulare Lake Basin Study Area have declined over time and there does not appear to be any reason to expect groundwater levels to stabilize. There are currently three

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	<p>basic methods available for managing groundwater resources in California: 1) management by local agencies under authority granted in the California Water Code or other applicable State statutes, 2) local government groundwater ordinances or joint powers agreements, and 3) court adjudications. However, no law requires that any of these forms of management be applied in a basin. Instead, groundwater management is often instituted after local agencies or landowners recognize a specific groundwater problem. The level of groundwater management in any basin or sub-basin is often dependent on water availability and demand.</p> <p>With the declining groundwater levels, it is becoming increasingly critical to manage and protect this resource, which is relied on for domestic uses by approximately 90% of communities in the Study Area.</p>
How	To be determined by the State of California. Local control of groundwater management activities may be maintained, however it is recommended that the Department of Water Resources consider ways to ensure that sufficient groundwater management planning is being conducted within the Basin to address declining groundwater levels and increasing water contaminant levels.
When	Ongoing
Funding	Unknown
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.D Clarify the interpretation of a well site control zone with a 50-foot radius, as referred to in Title 22, Chapter 16, Article, Section 64560 of the California Regulations Related to Drinking Water. The current interpretation in Tulare County is that there must be a 50-foot radius onsite around a well. This interpretation would require communities to purchase properties that are significantly larger than necessary. This interpretation would also eliminate existing lots within the community from consideration for use as well sites. Guidance should clarify how well sites may be able to meet the requirement to have a 50-foot control zone for source water protection, even if the well site itself is smaller.
Lead Entity	State Agencies
Why	It is noted that there is an acknowledgement of the need for some control of facilities or activities within the immediate proximity of public water supply wells. However, there have been interpretations of the subject code section that would require owners of new wells to physically acquire property that would exceed many properties available within a community. It is not believed that the intent of the code section is consistent with some of the interpretations. Some interpretations would impose a significant financial hardship to both acquire a large parcel and construct the water distribution facilities to connect the parcel to the existing community system. In addition, the definition of a control zone is in need of clarification for all parties

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	involved (owner of the water system, county regulatory staff, SWRCB regulatory staff). Considerations of existing property uses and existing public rights of way adjacent to proposed water supply wells require clarification.
How	It is suggested that examples are provided by the SWRCB (Division of Drinking Water) that would clarify the definition of a control zone, as it may extend beyond the limits of the actual well site property.
When	Now
Funding	Unknown
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.E Consider ways to encourage and provide funding to sewer communities that rely on individual septic systems that are failing or are on inadequately sized lots.
Lead Entity	Funding agencies including the State Water Resources Control Board, USDA and possibly county agencies utilizing Community Development Block Grant funds
Why	Failing septic tanks endanger public health in a number of ways, not least by exposing humans to raw sewage, and by contaminating groundwater supplies with bacteria and nitrates.
How	Conduct studies in communities that gauge the degree to which septic tanks are failing, what it costs homeowners to pump, repair and/or replace them. Conduct preliminary engineering studies that recommend a solution and develop estimated project costs and monthly sewer rates, so homeowners can make informed decisions.
When	Immediate and ongoing
Funding	State Water Board, USDA, CDBG
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.2 Encourage Shared Solutions to Reduce Vulnerability	
Recommendation	13.3.2.A Provide funding opportunities to encourage the development of regional cooperation, partnerships, and consolidation of services, where appropriate.
Lead Entity	State Agencies
Why	To encourage swifter implementation of appropriate shared or regional solutions, both “carrot” and “stick” approaches should be used in collaboration as appropriate towards that goal. Many local entities are otherwise uninterested and unwilling to even consider sharing services with neighboring systems and need further motivation.

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How	State agencies should not issue permits to new water or wastewater systems within a municipality or within ½ mile radius of an existing entity providing water or sewer service without showing of a good faith attempt to obtain service from an existing provider and help bring them into compliance, if needed. For existing public water systems that are struggling to meet compliance or have a history of non-compliance, regulatory agencies should promote or enforce action towards consolidation or shared solutions, as appropriate.
When	These requirements should be used as part of the permit application approval process, funding application review process, and MCL enforcement and annual system inspection process.
Funding	State agencies would not need extra funding to utilize this oversight power. However, state funding sources should be made available to support development and implementation of these solutions in conjunction with any enforcement or regulatory action, as appropriate.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.A Consider changes on Category E (insufficient source water capacity or delivery capability) project rankings, to make it easier to get funding for that category of projects.
Lead Entity	State Agencies
Why	There are many communities with insufficient water supply, however, the criteria for funding eligibility is heavily weighted on water quality challenges. The lack of sufficient water quantity is often a significant problem.
How	Review and revise the guidelines for ranking of funding eligibility criteria to enable funding assistance for water supply sources, especially for those communities with a single source of supply.
When	Now
Funding	Unknown
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.B Continue the Pre-Planning and Legal Entity Formation Assistance Program. Consider creation of similar programs for wastewater for areas currently on septic.
Lead Entity	State Drinking Water SRF and the State Water Board.
Why	There is a need for more flexible pre-planning funding to enable evaluation of appropriate governance alternatives to develop shared and regional solutions and to support solutions for areas not currently served by a public water system. The first round of applications for this indicated there was a large demand and unmet need, and additional rounds should be extended. This will both enable California to use its SRF

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	effectively, and help communities most in need of developing solutions be able to do the analysis it needs to develop the best solution, and address eligibility barriers by developing appropriate entities for construction and full project implementation. Historically the evaluation and development of regional solutions has not been able to score high or pass through eligibility barriers and this funding pot was created specifically to help address those challenges and allow these sorts of projects to be developed when they address disadvantaged community safe drinking water needs. Similarly, creation of a similar program should be evaluated for areas on septic or with unaffordable wastewater services to evaluate development of shared or regional wastewater solutions.
How	Implement this through the Intended Use Plans of the SRF programs.
When	The IUPs are developed annually. Additionally, applications should be accepted throughout the year.
Funding	This is primarily aimed at utilizing funding through the SRF programs.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.C Continue the Consolidation Incentive Program, however, modify the system so that large systems do not obtain benefits that are significantly out of proportion to the benefits provided by consolidation. Also consider expanding the consolidation incentive program and make it available to larger systems seeking to assist communities of private well owners impacted by the drought and/or facing water quality challenges.
Lead Entity	State Agencies
Why	There does not appear to be any limitation on the benefits received by the entity willing to allow the consolidation of a smaller system. If the larger entity (Incentive System) can receive funding assistance drastically beyond the scale of the cost of improvements to receive a consolidation then the use of public funds consistent with the Priority Categories may be in question.
How	Consider placing a limit on the allowed value of Incentive System projects that may be re-ranked to a higher Priority Category by virtue of a consolidation project. Also, consider allowing extension of services to those on State Small Systems and private wells that are contaminated or going dry, to be considered eligible for appropriate consolidation incentives.
When	Now
Funding	Unknown

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13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.D Consider ways to expedite the funding process, so that communities applying for funding do not spend several years drinking water that does not meet primary drinking water standards, and/or relying on insufficient water supply.
Lead Entity	All funding agencies (US EPA, SWRCB, USDA, DWR)
Why	Currently, communities cannot apply for funding until an actual water quality violation is documented. Often, though, it is apparent that a problem is emerging as contaminant levels slowly climb. Allowing systems to apply for funding based on documented contamination levels that are projected to exceed an MCL in the coming two to five years, for example, would give communities a big head start on fixing problems. This could significantly reduce the time that people spend drinking unsafe water. Another consideration would be to streamline the funding process so that it does not take five plus years from the time of initial application to implementation of a project.
How	Consider amending funding regulations and intended use plans to allow application by water systems that can demonstrate a documented increase in a regulated contaminant that is projected to exceed the MCL in two to five years. Also, consider methods to speed up the funding process, including amending planning contracts by adding design and construction phases.
When	This is a change to regulations that could be made immediately. It is anticipated that the recent Drinking Water Program transition from CDPH to SWRCB may help the Drinking Water Program funding process.
Funding	The Safe Drinking Water State Revolving Fund would be the most obvious, and possibly this change could be implemented through a change to the Intended Use Plan. DWR IRWMP funding could also be a good source for funding to avert future problems. In both cases, planning funding could be expanded to allow for studies that monitor, assess and project contamination that could exceed a health standard.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.E Streamline the process for payment of claims for state-funded projects, so that local water providers can receive more timely reimbursement. Simplify DWR IRWM claims reimbursement forms to be in line with SWRCB (Division of Drinking Water) claims process.
Lead Entity	All state funding agencies. USDA already makes payment electronically and in a matter of days.
Why	Waiting six weeks or more for state reimbursement puts water and wastewater systems in a difficult position.

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	Often they owe hundreds of thousands of dollars to a contractor for a month's work, and simply have no way to pay until they receive their state check. Payment made quickly and electronically would save weeks of delay, interest paid, and intense hardship by small systems.
How	Streamline reimbursement processes by being less stringent on documentation. Set up electronic fund reimbursement and other processes to expedite payments. Consider making advances in cases of hardship.
When	As soon as possible
Funding	None
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.F Require privately owned for-profit systems to conform to all requirements (including audits and other fiscal requirements) of publicly owned systems in order to receive public funding assistance.
Lead Entity	State Agencies
Why	Private for-profit systems are owned by an individual or private corporation. The general purpose of a private system is associated with the fiscal incentive for the owner of the system. Providing public funding assistance to upgrade privately owned water or wastewater systems may be construed as a gift of public funds. Private systems may not have been constructed or operated to the same standards as public systems. It may periodically be perceived that the users (tenants) of the private system are the primary consideration for determining if public funding assistance is appropriate. Care should be exercised to not remove the private owner responsibility for the water or wastewater infrastructure.
How	Ensure that the requirements associated with audits, fiscal reserves, rate structures, operational budgets, operational and managerial requirements, and technical requirements are mandated equally to all potential recipients of public funding assistance.
When	Ongoing
Funding	No additional funding is necessary.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.2 Target Outreach and Technical Assistance	
Recommendation	13.4.2.D Consider ways to allow communities in IRWM "white areas" (areas not currently within an IRWM group boundary) to participate in the IRWM process.
Lead Entity	DWR
Why	There are communities that are not within the boundaries of an IRWM group, but would like to participate in the IRWM process. The communities are currently unable to participate.

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How	Needs to be considered by DWR
When	Now
Funding	DWR and IRWM groups
13.5 Improve DAC Awareness and Participation	
Priority Issues: Lack of Informed, Empowered, or Engaged Residents	
13.5.1 Provide Community Outreach and Engagement	
Recommendation	13.5.1.C Expand community engagement in the development of projects. Funding to facilitate community engagement should be included in project budgets and standard approved scopes of work for project development at both the planning and construction phase. Feasibility studies funded by public funds must evaluate alternatives (including costs to end users and an evaluation of pros and cons) This information should be provided to the community at a public meeting for feedback as part of the planning process to select final alternatives for implementation. While this is typically already required to be presented during open session Board meetings, increased community engagement is recommended.
Lead Entity	Local service providers and State agencies
Why	In order to ensure that the best project alternative is developed and that there will be strong community-support to facilitate swift implementation and support any rate increases, there needs to be effective community engagement and sufficient analysis to provide for informed and transparent decision-making. Opportunities for community engagement are typically required through open session Board meetings, for which agendas must be posted for the public.
How	Standard scopes of work for planning and construction phases should include community engagement, and feasibility studies should evaluate alternatives to show pros and cons and estimated resulting costs to end users.
When	During development of any proposed project.
Funding	Outreach efforts could be funded through the project funding program and/or through the water or sewer fund of the local service provider.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.A County planning departments should require any new development near an existing system (within 1-2 miles) to evaluate the feasibility of connecting to the existing system, rather than permit the creation of a new system.
Lead Entity	County Planning Departments, LAFCOs, and State Agencies
Why	Permitting development of a new water system where there is the potential to connect to an existing

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	neighboring system perpetuates the priority issues that this Study and the recommendations herein aim to resolve. It is creating a new small system that will likely struggle to maintain sufficient TMF capacity, primarily due to lack of economy of scale, and where there are water quality issues known, this creates another system for which water quality issues will need to be resolved. On the other hand, if the new development connects with an existing system, it can help to bring that system into compliance rather than constructing a new system, it can provide improved economy of scale and additional rate payer base, it may allow access to additional resources, and it will allow for increase reliability for the system.
How	Address policy issues and permitting requirements for new systems to more actively require new development to connect with existing water and wastewater systems where feasible. County Planning Departments may not necessarily have the legal authority to require the existing system to make the connection. However, they can and should recommend that the property to be developed be annexed. LAFCOs should also consider this within the LAFCo approval processes.
When	Any time new development is proposed.
Funding	County, SWRCB
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.B Require and actively support investment in bringing existing systems into compliance and developing long-term sustainable and affordable solutions before allowing growth and as part of permitting growth in communities where the existing water system cannot accommodate growth due to inadequate drinking or wastewater infrastructure.
Lead Entity	Local entity, County, LAFCo, State funding agencies, and Legislature.
Why	Unless a local entity water or wastewater system is in compliance with regulatory requirements and is fiscally sustainable, it is unable to provide reliable and sustainable water and wastewater services to any new connections
How	The local entity must prove the ability to provide Technical, Managerial, and Financial capabilities for a sustainable system prior to consideration of growth. County planning should require such proof prior to proceeding with consideration of new development that would rely upon the local system(s). LAFCOs should also consider this within the LAFCo approval processes.
When	Ongoing
Funding	Local entity rate structure

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.B The water quality from private wells shall be analyzed and any contaminants exceeding primary drinking water quality standards should be disclosed upon sale of a property. The contaminants to be analyzed may vary by county or region within California; however for the Tulare Lake Basin it is recommended that, at minimum, water quality from private wells should be analyzed for coliform bacteria, nitrates and arsenic. If other contaminants, such as uranium, TCP, Chrome-6, perchlorate, or DBCP are known to be prevalent in the area near the subject property, a buyer may request analysis of the known contaminants in the area. This would put some onus on the Department or Real Estate to inform realtors of the water quality issues in their area of service.
Lead Entity	State Agencies, Department of Real Estate, Legislature, property owners
Why	There are currently no requirements for ongoing monitoring of private well water quality. As such, a homeowner may have no reasonable way to know the quality of water that is being consumed, and may not even consider that it could have contaminant levels in exceedance of a water quality standard. A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	Through State Agencies, Legislature, and/or Department of Real Estate require that water quality be disclosed upon sale of a home. The water quality disclosure will be between the seller and the buyer. This is not recommended to be public information, due to the confidentiality and privacy considerations of property owners.
When	Now, ongoing
Funding	Funding for water quality sampling will be through real estate transactions.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.C Clarify conflicting policies related to farm worker housing. The policy that counties shall permit and encourage the development of sufficient farm labor housing (California Health and Safety Code Section 17021.6) can be inconsistent with the requirement to provide safe drinking water (in areas where water quality does not meet drinking water standards). There should be no requirement to issue a permit if doing so causes a violation of water quality standards for the tenants to be served. These conflicting policies put counties in a difficult position.
Lead Entity	State Agencies

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Why	The California Department of Housing and Community Development analyzes special housing needs for farm workers. There can be a legal conflict if it is demonstrated that there is a need for farm labor housing under the Housing Element, but water meeting drinking water standards is not available to that farm labor housing development. In this case, the county has a dilemma as to whether or not to permit the farm labor housing knowing that their water supply will not meet State and Federal drinking water standards. In either case, they would be required to violate a State policy.
How	To be determined by State agencies.
When	Now
Funding	Unknown
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.B Develop a centralized reporting and data management system so that water supply related data can be shared and coordinated among agencies. For example, well logs retained by DWR can be correlated with water quality information retained by SWRCB. This will likely require confidentiality agreements between agencies.
Lead Entity	State Water Agencies (DWR, State Water Board)
Why	Water data is currently housed in many different agencies and not accessible or easily integrated to inform planning, regulatory activities, or water management. The state should provide consistent and ideally centralized or easily integrated data management systems to allow for water data to be more effectively utilized and support good decision-making.
How	All state agencies should have consistent protocols and requirements for electronic reporting in water monitoring or data reporting requirements within regulatory or other related programs. Currently, Geotracker GAMA seems to include most water quality data, while DWR holds records on water supply and well completion reports. Integration of the Drinking Water Program into the State Water Board will likely speed up integration of drinking water reporting systems with other State Water Board databases. However, it is unclear how DWR data and State Water Board data will be better integrated. Confidentiality issues will need to be coordinated between state agencies that may obtain access to confidential data
When	This should be evaluated as part of the Governor's efforts to improve groundwater management.
Funding	This could be funded through general funds, program fees, and bond where appropriate within the State budget and appropriation process.

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13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.C Disclosure of water quality data – Require disclosure to the buyer of water quality on sale of property. In areas where there is a Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would be laboratory reports for samples collected from the private well. Recommend sampling for known and suspected contaminants in the area [See Recommendation 13.6.2.B].
Lead Entity	State Agencies, Legislature, Department of Real Estate, local water service providers, property owners
Why	A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	How: Through State Agencies, Legislature, and/or Department of Real Estate, require that water quality be disclosed upon sale of a home. For properties served by a regulated Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would require sampling and disclosure of laboratory reports indicating constituent levels and whether or not they are in exceedance of any primary water quality standards.
When	Now, ongoing
Funding	Funding for water quality sampling and disclosure will be through real estate transactions.

FEDERAL AGENCIES

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Federal Agencies

13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.1 Reduce Costs	
Recommendation	13.2.1.C Consider providing increased funding for capital improvements for water (or wastewater) related projects when it would allow for reduced O&M costs over the long term. For example, construction of dual water systems for DACs with poor distribution systems or high non-potable water demand.
Lead Entity	State and Federal funding agencies
Why	Grant funding for DACs is currently capped at \$5 million for capital costs (for Prop 84 funding). O&M costs must be paid by the system customers. There may be instances when a capital cost greater than \$5 million may provide a DAC with less O&M costs compared to an improvement with a capital cost less than \$5 million. For example, a dual water system would allow the DAC to treat a smaller volume of potable water resulting in lower on going O&M costs. Other funding sources such as SRF and USDA are available, which typically have loan components.
How	Consider allowing DACs to obtain grant funding for capital costs greater than \$5 million if the higher capital costs solution will lower ongoing O&M costs. An evaluation to determine appropriate levels of funding and qualifications would need to be done prior to increasing current funding limits.
When	When considering new funding programs or funding program updates.
Funding	Local funds, State legislature, SWRCB

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13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.E Consider ways to encourage and provide funding to sewer communities that rely on individual septic systems that are failing or are on inadequately sized lots.
Lead Entity	Funding agencies including the State Water Resources Control Board, USDA and possibly county agencies utilizing Community Development Block Grant funds
Why	Failing septic tanks endanger public health in a number of ways, not least by exposing humans to raw sewage, and by contaminating groundwater supplies with bacteria and nitrates.
How	Conduct studies in communities that gauge the degree to which septic tanks are failing, what it costs homeowners to pump, repair and/or replace them. Conduct preliminary engineering studies that recommend a solution and develop estimated project costs and monthly sewer rates, so homeowners can make informed decisions.
When	Immediate and ongoing
Funding	State Water Board, USDA, CDBG
13.3 Improve Water Supply Quality and Reliability	
Priority Issues: Poor Water Quality, Inadequate Supply Reliability, Inadequate Existing Infrastructure, and Insufficient Quantity of Water	
13.3.1 Prevent Worsening of Problems	
Recommendation	13.3.1.F Allow drinking water funding agencies to fund infrastructure for fire flow requirements. Where affordability or feasibility of the project is jeopardized by meeting full fire flow requirements, also allow drinking water projects to be funded for domestic purposes provided a limited level of fire flow is available. Where a viable option, the feasibility of installing a dual water distribution system to meet domestic supply and fire flow requirements, should be considered (especially where irrigation demands can be accommodated through the non-potable system used for fire flow).
Lead Entity	County Fire, County Boards of Supervisors, and funding agencies such as USDA
Why	Especially in communities where water must be treated to remove contaminants, it should be an option for utilities to choose to treat only the water that is actually consumed by people. Fire flow and outside irrigation demands can represent a significant portion of the total water demand in a given community, and requiring that fire flow is always available means that more water is being pumped and treated than is being consumed. Dual systems present one way for communities to protect public safety without building oversized treatment and potable water distribution systems. The dual system can also allow for use of

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	untreated water for irrigation purposes, additionally reducing the system treatment requirements. In cases where a dual system is cost prohibitive, and attaining fire flow requirements through the main potable system is much too expensive to operate, allowing a reduced fire flow capacity should be considered.
How	Adjust fire codes to allow for greater flexibility in the manner in which communities meet fire flow requirements, or perhaps reducing those requirements. Provide funding (e.g., Community Facility loans and grants through USDA) to install parallel piping that is dedicated for fire flow and landscape irrigation use. Utilize existing wells that do not meet Title 22 requirements to supply the second system, when available.
When	As soon as practicable
Funding	USDA Community Facilities or Water & Wastewater loans/grants.
13.4 Improve Funding to DACs	
Priority Issues: Inadequate or Unaffordable Funding, Constraints to Make Improvements	
13.4.1 Improve Scoring Criteria and Guidelines	
Recommendation	13.4.1.D Consider ways to expedite the funding process, so that communities applying for funding do not spend several years drinking water that does not meet primary drinking water standards, and/or relying on insufficient water supply.
Lead Entity	All funding agencies (US EPA, SWRCB, USDA, DWR)
Why	Currently, communities cannot apply for funding until an actual water quality violation is documented. Often, though, it is apparent that a problem is emerging as contaminant levels slowly climb. Allowing systems to apply for funding based on documented contamination levels that are projected to exceed an MCL in the coming two to five years, for example, would give communities a big head start on fixing problems. This could significantly reduce the time that people spend drinking unsafe water. Another consideration would be to streamline the funding process so that it does not take five plus years from the time of initial application to implementation of a project.
How	Consider amending funding regulations and intended use plans to allow application by water systems that can demonstrate a documented increase in a regulated contaminant that is projected to exceed the MCL in two to five years. Also, consider methods to speed up the funding process, including amending planning contracts by adding design and construction phases.
When	This is a change to regulations that could be made immediately. It is anticipated that the recent Drinking Water Program transition from CDPH to SWRCB may help the Drinking Water Program funding process.
Funding	The Safe Drinking Water State Revolving Fund would be the most obvious, and possibly this change could be implemented through a change to the Intended Use Plan. DWR IRWMP funding could also be a good source for funding to avert future problems. In both cases, planning funding could be expanded to allow for studies that monitor, assess and project contamination that could exceed a health standard.

LEGISLATURE

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Legislature

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	13.1.3.C Support the evaluation and development of a regional entity or entities to provide regional operations, management, or other services in regions that are interested in exploring such services. Efforts should begin with a small region or group of interested communities to show interest and success before considering scaling-up to any type of larger regional entity. Regional DAC operations or management services may include some or all of the following: 1) provide the organization, structure, and capacity needed to support development and funding of sustainable and affordable shared solutions, particularly for communities not currently served by centralized water and wastewater providers, 2) provide direct management and operations of existing DAC water systems when needed or requested, and 3) directly represent participating DACs in IRWM groups or other forums, when appropriate.
Lead Entity	Counties, non-profit organizations, or other regional entity (including one or more special districts). If a special district structure is used, LAFCOs would need to support consolidation or creation of the new regional special district serving areas that may or may not be physically connected. This may also necessitate legislative action.
Why	Many disadvantage communities lack sufficient organization, capacity, and representation structure required to develop, implement and maintain drinking water and wastewater systems. This is particularly true of DACs without an existing centralized public water system or wastewater system, as well as systems that go into receivership, or are just not sustainable due to inadequate technical, managerial, and financial capabilities. Some DACs within smaller regions of a county have started to consider options to create different forms of unified regional entities to provide water and/or wastewater services (e.g. Northern Tulare County, Alpaugh-Allensworth area, and communities in western Fresno County). While counties and other existing water and wastewater agencies are able to support some of these functions on a case by case basis, counties and

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	existing providers are often reluctant to take on additional responsibilities for troubled DAC systems. There is a need and interest in some areas for an entity or entities that can have the focused capacity to regionally or jointly operate systems when needed (e.g., receivership) and/or requested. Additionally, where regional entities are established, they can directly represent those DACs within local IRWMs and facilitate enabling more in-depth integration of DAC needs and projects within planning efforts and regional project development.
How	<p>It is most feasible to begin with a smaller group of DACs voluntarily working together to establish a regional operating entity that can perform some of these functions to test such a model, show success, and build the framework and trust in such an entity. Additionally, rather than taking on all planning, project development, operation and representation functions at once, an entity could start by taking on one or two of these functions, such as operating existing entities as a receiver or taking on operations of zones of benefits from a county that no longer wants to directly provide that role. Areas to begin initial efforts, where DACs have already expressed interest in exploring a regional operation model, include the South Tulare County forum or the Northern Tulare County regional water system study efforts.</p> <p>Such an entity or organization could be housed in an existing agency or local government or non-profit organization, or be a new independent entity. LAFCOs must be involved in development of these concepts and should support consideration for allowing regional entities that may or may not be geographically contiguous or physically connected.</p>
When	Some regions are already pursuing these models and further development should be supported following the completion of this Study.
Funding	<p>The funding to start up a new entity to provide regional operations services may take some support by state funding sources. However, the funding to maintain this type of entity and fund the operations and maintenance of the entity beyond a start-up phase would need to rely entirely on funding from local rate payers and other revenues generated by the local provider. Therefore, it is important that any start up phase include developing the ability to collect fees and a sufficient economy of scale to fully sustain these services. State funding sources to support piloting small regional entities could include the Clean Up and Abatement Account, SRF Pre-Planning and Legal Entity, and IRWM funding. Future bonds or budget allocations may be able to provide funding for these activities. Additionally, pilot project funding could be pursued from private foundation sources, USEPA, or USDA for purposes tailored to meet the criteria of those funding sources. In other parts of the country, local governments, states and the federal government have funded part or all of start-up and implementation of regional water entities.</p>

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13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	13.2.2.E Consider establishing a transitional funding program to assist with O&M costs on a temporary basis.
Lead Entity	State agencies and the legislature
Why	At the state level there is a need for a targeted and coordinated funding program with the clear goal of transitioning small disadvantaged communities in unincorporated areas without safe drinking water (including those communities with and without existing public water systems) to achieve, self-sustaining, affordable drinking water systems.
How	<p>This newly targeted program should specifically include funding for the following:</p> <ul style="list-style-type: none">✓ Technical Assistance for both 1) project application and project operation and management (currently eligible under SWRCB Division of Drinking Water funding but not DWR IRWM funding), and 2) leadership and capacity training;✓ A pooled capital reserve fund, which can cover both short-term financing costs and help lower O&M costs; and✓ Some O&M subsidies for an initial period of time until long-term solutions are implemented and self-sustaining. <p>As a “transitional” program, the associated funding should be limited to supporting the transition of existing disadvantaged communities into self-sustaining systems that can achieve compliance with the applicable regulatory requirements and ensure affordable rates. The program should not be a long-term, ongoing financial support mechanism. As such, a disadvantaged community’s participation in a transitional funding program should have conditions and incentives to ensure it is meeting certain objectives and milestones in a timely manner. In particular, at minimum state agencies should require and provide TMF training and improvements as a condition of receiving this O&M funding.</p>
When	This should be considered as part of the IUP process, state budget and legislative process, and within the creation or appropriation of new funding sources, including the new water bond.
Funding	Such an effort would need to include targeting significant amounts of existing funding sources, and will need new and additional funding sources to adequately address the needs and gaps identified above. The modified Water Bond should include significant funding for this effort. It may be possible to create a set aside in the SRF Intended Use Plan (IUP) for some or all of this purpose, as well as utilizing the Clean Up and Abatement Account and IRWMPs for at least some of these purposes. If a statewide or other scale of water user fee were established, part of it could be used for this purpose. Funding for ongoing O&M costs should

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	be from the water or sewer fund supported by local users through water or sewer rates.
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.B Require and actively support investment in bringing existing systems into compliance and developing long-term sustainable and affordable solutions before allowing growth and as part of permitting growth in communities where the existing water system cannot accommodate growth due to inadequate drinking or wastewater infrastructure.
Lead Entity	Local entity, County, LAFCo, State funding agencies, and Legislature.
Why	Unless a local entity water or wastewater system is in compliance with regulatory requirements and is fiscally sustainable, it is unable to provide reliable and sustainable water and wastewater services to any new connections
How	The local entity must prove the ability to provide Technical, Managerial, and Financial capabilities for a sustainable system prior to consideration of growth. County planning should require such proof prior to proceeding with consideration of new development that would rely upon the local system(s). LAFCOs should also consider this within the LAFCo approval processes.
When	Ongoing
Funding	Local entity rate structure
13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.1 Restricting Permits for Development	
Recommendation	13.6.1.D In areas where there is no existing water system infrastructure available, building permits should only be issued if adequate supply and quality from a private well is confirmed to be available. This may include installation of a viable treatment system (POU or POE) with acceptable maintenance service.
Lead Entity	Counties, Legislature
Why	Issuance of a permit to build a home on a property where there is not existing water system infrastructure available, and where the supply and quality available from a private well are not confirmed to be sufficient, puts the homeowner or tenant at risk of having a water supply that does not meet water quality standards and/or water supply that may be insufficient.
How	Require an analysis of water supply prior to issuing a building permit. In areas of known groundwater contamination (high levels of primary constituents), counties should not zone for residential building.
When	Now, ongoing
Funding	No funding necessary.

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13.6 Improve Land Use Planning to Minimize Creation of New Water/Wastewater Issues	
Priority Issues: Lack of Vision and Integrated Planning to Develop Solutions	
13.6.2 Planning and Zoning	
Recommendation	13.6.2.B The water quality from private wells shall be analyzed and any contaminants exceeding primary drinking water quality standards should be disclosed upon sale of a property. The contaminants to be analyzed may vary by county or region within California; however for the Tulare Lake Basin it is recommended that, at minimum, water quality from private wells should be analyzed for coliform bacteria, nitrates and arsenic. If other contaminants, such as uranium, TCP, Chrome-6, perchlorate, or DBCP are known to be prevalent in the area near the subject property, a buyer may request analysis of the known contaminants in the area. This would put some onus on the Department or Real Estate to inform realtors of the water quality issues in their area of service.
Lead Entity	State Agencies, Department of Real Estate, Legislature, property owners
Why	There are currently no requirements for ongoing monitoring of private well water quality. As such, a homeowner may have no reasonable way to know the quality of water that is being consumed, and may not even consider that it could have contaminant levels in exceedance of a water quality standard. A buyer has the right to know what is in the water and whether it may have potential health impacts, just as he has the right to know if there are termite issues or roof damage.
How	Through State Agencies, Legislature, and/or Department of Real Estate require that water quality be disclosed upon sale of a home. The water quality disclosure will be between the seller and the buyer. This is not recommended to be public information, due to the confidentiality and privacy considerations of property owners.
When	Now, ongoing
Funding	Funding for water quality sampling will be through real estate transactions.
13.7 Develop & Maintain Information on DAC Water/Wastewater Needs	
Priority Issues: Lack of Information on DACs	
13.7.2 Improve Data Management and Accessibility	
Recommendation	13.7.2.C Disclosure of water quality data – Require disclosure to the buyer of water quality on sale of property. In areas where there is a Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would be laboratory reports for samples collected from the private well. Recommend sampling for known and suspected contaminants in the area [See Recommendation 13.6.2.B].
Lead Entity	State Agencies, Legislature, Department of Real Estate, local water service providers, property owners
Why	A buyer has the right to know what is in the water and whether it may have potential health impacts, just as

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	he has the right to know if there are termite issues or roof damage.
How	How: Through State Agencies, Legislature, and/or Department of Real Estate, require that water quality be disclosed upon sale of a home. For properties served by a regulated Public Water System, this may be in the form of recent Consumer Confidence Reports. For properties with private wells, this would require sampling and disclosure of laboratory reports indicating constituent levels and whether or not they are in exceedance of any primary water quality standards.
When	Now, ongoing
Funding	Funding for water quality sampling and disclosure will be through real estate transactions.

**TECHNICAL ASSISTANCE PROVIDERS, NON-PROFIT ORGANIZATIONS,
COMMUNITY COLLEGE DISTRICTS, AND OTHER ENTITIES
NOT COVERED IN A DIFFERENT CATEGORY**

Plan Recommendations for the Tulare Lake Basin Disadvantaged Community Water Study¹

Technical Assistance Providers, Non-Profit Organizations, Community College Districts, and other Entities Not Covered in a Different Category

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.D Continue to convene a DAC focused stakeholder group for the Tulare Lake Basin, and expand outreach and engagement to further enhance DAC, County, IRWM, and other local stakeholder engagement and participation. Expanded outreach and engagement efforts should educate local board members, operators, and residents on local water and wastewater challenges and priority issues, as well as resources that are available, including findings and recommendations developed through this Study and existing resources from technical assistance providers. Continuation of stakeholder meetings should occur at least quarterly to track progress on the recommendations of this Study and provide updates on new program, challenges, resources or opportunities.
Lead Entity	The stakeholders that have participated in the Tulare Lake Basin Disadvantaged Community Water Study (particularly those in the SOAC), including state agencies, counties, IRWMs, DAC representatives, and non-profit organizations.
Why	Local DAC stakeholders have found it to be valuable to come together on a regular basis to discuss local DAC issues, opportunities and programs, and reflect on recommendations through this multi-year Study process. The SOAC recommended that the group continue to meet quarterly to track progress on the recommendations of this Study, as well as engage more extensive DAC stakeholders through a local follow-up outreach and engagement campaign. Expanded outreach and engagement would help enable local systems to utilize tools and lessons learned through this Study, as well as other existing resources, and develop appropriate solutions. This would help ensure that this Study is more than just a report, but will actually be accessed by communities and help to develop long-term sustainable solutions to local water and wastewater challenges.

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How	This would be best accomplished through continuation of the SOAC process through a coordinated effort with all the stakeholders, counties, organizations and agencies that have participated in the Tulare Lake Basin Disadvantaged Community Water Study. Some funding would be needed to 1) have a coordinating entity continue to facilitate these groups and invite representatives to participate in local stakeholder meetings, and 2) support planning and implementation of expanded outreach and engagement throughout the Basin. Participation from local disadvantaged communities, counties, non-profits and funding agencies directly in the outreach and engagement would help make these efforts more effective by lending credibility, resources, and reliability through personal connections from communities in similar situations.
When	Following completion of this Study, meet quarterly and identify a plan and funding to expand outreach and engagement to additional stakeholders in the Basin.
Funding	Counties could fund continuation of quarterly meetings of the SOAC. Additionally, the group could approach state or federal funding agencies about funding for a coordinating entity (a non-profit or local agency) to coordinate an expanded outreach, education, and engagement campaign to follow up after this Study has ended. Local non-profits could approach private and public funding sources to support these efforts.
13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.E Target existing technical assistance training programs to specific communities who have shown a need and interest, to focus on their needs and provide locally available and specialized training programs.
Lead Entity	State Agencies and technical assistance providers (RCAC, SHE, etc.)
Why	Local, targeted trainings are more effective because they are more accessible to rural communities, and can be tailored to meet the unique needs identified by water and wastewater system representatives. There is an additional benefit to bringing local water and wastewater system representatives together so they can network and learn from each other.
How	SWRCB (Division of Drinking Water) in coordination with Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) will be providing targeted board training for several communities in the Study Area. This initial effort can inform how a program can be expanded, improved and continued to other targeted groups of communities. SWRCB staff and technical assistance providers should work together to identify target communities. A local venue would be identified and invitations extended to water system representatives, including board, staff and operators.
When	Quarterly or biannually, in different locations. Follow-up trainings could be scheduled as needed, depending on response.
Funding	State Water Resources Control Board technical assistance funding through the SRF set aside, or current or future bond funding.

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13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.2. Provide Assistance and Training	
Recommendation	13.1.2.G Consider developing operator training programs at local community colleges to address the lack of licensed water and wastewater operators.
Lead Entity	Local Community Colleges (State Center Community College District, Sequoias Community College District, Kern Community College District, West Hills College, or others)
Why	<p>There is a lack of properly certified operators available to operate water and wastewater systems throughout the Study Area. With increasing regulations necessitating the need for more and higher grade treatment facilities, this will only become more of an issue if operator training programs do not become a higher priority.</p> <p>Training programs have been attempted at local community colleges, however, they have had trouble filling seats, and so these programs have not been sustainable. It may require some outreach efforts to encourage students to pursue this career path, but local job opportunities and compensation would need to support that.</p>
How	Community college districts should discuss and evaluate the need for providing operator training programs. If such programs are developed, the community college district should outreach to youth to inform them of the benefits of these training programs and the need for water and wastewater system operators. It is recommended that an evaluation be conducted of the magnitude of operator needs and relative compensation levels for those who complete such training programs, so that the outreach efforts can be properly informed. These discussions should involve CWEA and their experience related to operator training needs.
When	Ongoing
Funding	Community college districts

DISADVANTAGED COMMUNITY WATER STUDY FOR THE TULARE LAKE BASIN

Plan Recommendations

13.1 Improve Local TMF Capacity	
Priority Issue: Lack of Technical Managerial and Financial Capacity by Water and Wastewater Providers	
13.1.3. Encourage Sharing of Resources to Build TMF Capacity	
Recommendation	<p>13.1.3.B Establish local DAC coordinator(s) for the Tulare Lake Basin to support DAC outreach, collect updated information on DAC water and wastewater needs, help link communities to funding sources, training opportunities, and technical assistance resources, and help integrate DACs into planning processes, including IRWMPs.² Specific responsibilities could include some or all of the following:</p> <ul style="list-style-type: none"> ○ Provide outreach, communication, and capacity development with local disadvantaged communities in unincorporated areas. ○ Collect updated information on DAC water and wastewater needs and collect new information to close data gaps (i.e., TMF capacity needs, source of water where unknown in database, water supply needs, etc.). ○ Provide technical assistance to DAC water and wastewater entities who are trying to integrate their needs within IRWM and other local and regional planning efforts. ○ Work with individual DACs to determine appropriate funding programs. ○ Provide information to DACs on available training and technical assistance providers and resources, including fundraising, grant writing, fiscal management, and project management assistance. ○ Link local DACs to experts (including NGOs and private contractors) that can effectively facilitate and support locally-developed, voluntary consolidation or other forms of shared solutions and regional planning efforts by providing expertise for studies or analysis, stakeholder facilitation, as well as legal and LAFCo process assistance, with the goal of advancing the most sustainable and affordable solutions.
Lead Entity	Existing local non-profits organizations or technical assistance providers could provide DAC coordination and outreach activities. State agencies, local counties, and IRWMPs could also provide support for this position.
Why	In order to effectively and efficiently plan and implement water and wastewater solutions in the Tulare Lake Basin, where there are a large number of disadvantaged communities in unincorporated areas without safe

² This recommendation is intended to be consistent with recommendations related to the need for DAC coordinators and DAC representation provided in both the Kings Basin DAC Study and the Governor's Drinking Water Stakeholder Group's Report on New and Expanded Funding Sources.

Kings Basin DAC Study: http://www.krce.org/pdf_ukbirwma/Kings%20Basin%20DAC%20Final%20Report.pdf

Governor's Drinking Water Stakeholder Group Report:

http://www.swrcb.ca.gov/water_issues/programs/groundwater/docs/stakeholders/8132013_2_final_rep_new_expanded_funding.pdf

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	drinking water and wastewater services, targeted assistance is needed to support coordination of DACs. Without this kind of coordination, disadvantaged communities in unincorporated areas will likely remain isolated, disjointed, and often unorganized without structural capacity and an ability to implement cost effective drinking water and wastewater solutions and effectively participate in planning or regional project development processes.
How	Given the hundreds of DACs in the TLB, ideally coordinators could be funded for each county and/or for each watershed within the TLB. Efforts to coordinate DACs locally could be organized through local DAC associations or tasks forces, although a DAC coordinator would likely be (at least initially) housed within an existing local non-profit organization. State and federal funding agencies could consider setting aside specific funding for local DAC coordinators as part of state funding program outreach and technical assistance budgets. It is noted that this would be a voluntary program for those communities interested in utilizing the services of a DAC coordinator for the potential services described above. Counties, local IRWMs and local non-profit organizations should also consider ways to provide these services or support these efforts. Local counties and IRWM groups could support this through official recognition of DAC coordinators within planning and project development processes, providing DAC update items within relevant meeting agendas, and deliberate coordination with staff and decision-making bodies with explicit intent to integrate DAC issues and support effective DAC outreach and engagement.
When	Ongoing
Funding	State funding could be targeted through existing technical assistance set-asides, such as the SRF, through existing funding program outreach and assistance budgets, or through new bonds or funding sources. For DACs directly represented by a coordinator, the local water or wastewater provider could provide funding to support this position. Additionally, non-profit organizations could seek private sources of funding to support these activities, at least to get processes started.

DISADVANTAGED COMMUNITY WATER STUDY FOR THE TULARE LAKE BASIN

Plan Recommendations

13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.2 Increase Revenues	
Recommendation	<p>13.2.2.C Seek funding to install or replace water meters. The replacement meters should be capable of being read remotely (if the system size or agreements with neighboring systems support it) to reduce labor costs.</p> <ul style="list-style-type: none"> ○ Consider installing same meters as neighboring community(ies) so that meter reading and billing systems can be shared. ○ Develop a tiered rate structure with appropriate base rates and water usage rates to encourage conservation while ensuring sufficient revenue.
Lead Entity	Local government boards, technical assistance providers/consultants
Why	Installation of water meters is a basic and very effective method of water conservation. Metering leads to natural behavioral changes by water consumers because meters tie water use directly to household finances. Reduction in water use results in lower operating and maintenance expenses to the utility. Use of water meters also provokes the development and use of tiered rate structures, which are an excellent tool for improving overall utility finances and distributing costs over customers with different use patterns. Additionally, installing compatible meters in several locations in a given region can provide a very good opportunity for communities to enter into contractual agreements to share equipment, software, billing functions and staffing positions.
How	Consult with a technical service provider and/or engineering consultant to determine the available funding opportunities. Water meter installation could be considered as part of a larger infrastructure project, or as a separate project.
When	Immediate and ongoing
Funding	A source of funding is the water or sewer fund of the local service provider. State agencies could redefine Category H projects (as defined by the State Revolving Fund Project Ranking Criteria) to include replacement metering projects, including meter reading equipment and necessary software. DWR could fund an ongoing Water Use Efficiency program (currently the program is funded only periodically) in which metering and re-metering projects are eligible.

DISADVANTAGED COMMUNITY WATER STUDY FOR THE TULARE LAKE BASIN

Plan Recommendations

13.2 Improve O&M Funding	
Priority Issue: Lack of Funding to Offset Increasingly Expensive Operations and Maintenance Costs in Large Part due to Lack of Economies of Scale	
13.2.3 Provide Assistance, Training and Information	
Recommendation	13.2.3.B Continue to provide, expand, and better publicize technical assistance training on developing rate studies and establishing rate policies, which should also include guidance on conducting a Prop 218 hearing. This type of assistance is currently available for disadvantaged communities from SWRCB technical assistance providers.
Lead Entity	State Agencies, Technical Assistance providers
Why	The Prop 218 process in California is complicated and nuanced. Many legal questions remain unanswered, even after almost twenty years. Many questions arise during a Prop 218 process, and can therefore become very expensive due to extensive legal consultation. The more training that Boards and staff receive before embarking on a Prop 218 rate change, the more adept they will be at navigating the process and avoiding pitfalls. The availability of State agencies or other technical service providers for assistance during the process would be very useful to many small districts that do not retain regular counsel, however this does not dismiss the need for legal counsel. The local entity should hire an attorney for specific guidance through this process.
How	Holding periodic trainings in the physical context of government buildings can remind participants of the larger system in which they function as local government representatives. On the other hand, it might be most impactful to hold a training related to developing a rate study and conducting a Prop 218 hearing in particular communities, scheduled to precede a planned rate change.
When	Trainings should be held one to two times per year. Weekday evenings may work best.
Funding	Local funding, state agencies, or technical assistance funds already available could be used for this purpose.