

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 15 October 2021**

**Response to LATE Written Comments on the Central Valley Water Board's Draft Strategic Plan**

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The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to **late-submitted** comments by Leadership Counsel for Justice and Accountability, Clean Water Action, and Community Water Center (LCJA, et al.) regarding the draft Central Valley Water Board Strategic Plan (Strategic Plan). The Strategic Plan will be considered for adoption by the Central Valley Water Board during a public meeting on 15 October 2021. The Strategic Plan will guide the Central Valley Water Board's efforts for the next 5-7 years.

A public notice distributing the draft Strategic Plan was issued on 31 August 2021. The public notice was distributed via email and the Central Valley Water Board's website. Comments were to be received by 5:00 p.m. on 22 September 2021 (deadline). The Board received comments from LCJA, et al. on October 11, but will still consider these comments.

Written comments are summarized below, followed by responses from Central Valley Water Board staff. Based on the comments, staff made some minor changes to the draft Strategic Plan which will be presented to the Board on 15 October 2021.

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**Leadership Counsel for Justice and Accountability, Clean Water Action, and Community Water Center (LCJA, et al.)**

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**LCJA, et al. No. 1:** The Strategic Plan does not reference the Human Right to Water, nor the impending State Water Board Equity Resolution. The Human Right to Water must be incorporated into the Central Valley Board's Vision Section and Strategic Objectives.

**RESPONSE:** Omitting a specific reference to the Human Right to Water was an oversight, since the Human Right to Water essential touchstone as the Board debated and adopted its mission statement, vision statements, and values. Comments at the session included a re-dedication to the Human Right to Water, the Board's own commitment in Resolution No. R5-2016-0018, which adopted the Human Right to Water as a core value in Central Valley Water Board Programs and Activities. Specifically, the External Vision Statement, which reads, "A Central Valley where aquifers and surface waters meet or exceed water quality necessary to support all beneficial uses, **where all communities have access to safe, affordable, and resilient water supplies, and where all people have a shared responsibility for water quality that is sustained through multi-generational stewardship that begins in the homes and classrooms throughout the region,**" was developed to reflect the values of the Human Right to Water. Furthermore, the Board's values, which include, "Diversity, Inclusion, and Anti-Racism"; "Beneficial Outcomes for All"; "Public Health"; "Economic Fairness"; "'Generational' Preservation of Water"; and "Community" are all meant to augment the Board's commitment to the Human Right to Water. The Strategic Plan has been edited to include this reference.

Furthermore, the Central Valley Water Board and its staff have been instrumental in the development of the Racial Equity Resolution (Central Valley Water Board staff have dedicated a great deal of time to the Committee working to develop the language in the Resolution). The Strategic Plan Objectives have been updated to include a reference to the impending Resolution.

**LCJA, et al. No. 2:** The Strategic Plan stated a number of times that public input helped guide the creation of this plan. However, based on the information provided in the Strategic Plan, it is unclear how the public was engaged and how the input was incorporated into the plan. We urge the Central Valley Board to better explain these processes and their results so they can be publicly evaluated.

**RESPONSE:** The following is a list of the public meetings and public engagement efforts surrounding the development of the Strategic Plan:

- **Board Meeting Public Strategic Planning Session, 1 August 2019:** At the meeting, the Board conducted a public discussion about developing a Strategic Plan for the Central Valley Water Board. Comments from the public were received.
- **Board Meeting Public Strategic Planning Session, 10 October 2019:** State Board Liaison had comments about the initial Strategic Planning documents put together by the Board's Executive Officer. In the public meeting, the Board approved Strategic Planning Committee membership and discussed and approved proposed Mission and Vision Statements language. Comments from the public were received.
- **Board Meeting Public Strategic Planning Session, 20 February 2020:** Board conducted a discussion of Strengths, Weaknesses, Opportunities and Threats, and discussed public outreach. Comments from the public were received.
- **Board Meeting Public Strategic Planning Session, 4 June 2020:** Development of the Strategic Plan was discussed, along with a target date for the completion of the Strategic Plan, set for April 2021. Comments from the public were received.
- **Board Meeting Public Strategic Planning Session, 13 August 2020:** Lengthy discussion at the Board meeting on a Strategic Planning Draft Outreach Plan. Strategic Planning Committee received feedback from the Board and from the public on questions to be used in our public outreach.
- **Discussion at Board Meeting as Part of EO Report, 10 December 2020:** The upcoming strategic planning survey (Survey) and the targeted stakeholder list were discussed before the Board at the Board's Public Meeting as part of the EO Report.
- **Notification of Availability of Strategic Planning Survey, 11 January 2020:** Online Strategic Planning Survey was widely distributed.

- **Discussion at Board Meeting as Part of EO Report, 19 February 2021:** EO report to the Board included an update on the in-progress survey, with a goal for sharing the survey results summary with the Board in April 2021.
- **Strategic Planning Survey Closed, 22 February 2021:** Access to the Survey ended at midnight. The online survey, conducted in English and Spanish, yielded 457 unique results.
- **Special Facilitated Strategic Planning Workshop, 19 March 2021:** The Central Valley Water Board partnered with the State Water Board's Office of Public Participation and retained a special facilitator from Stantec that helped develop and facilitate a Strategic Planning Workshop open to the public. Attendance included persons representing a wide variety of stakeholders, including disadvantaged communities.
- **Board Meeting Public Strategic Planning Session, 22 April 2021:** The Strategic Planning Committee presented results of Strategic Planning public outreach to the Board at the public Board meeting. The Executive Officer presented the 4 strategic objectives developed through public processes. Comments from the public were received.
- **Board Meeting Public Strategic Planning Session, 17 June 2021:** The Board received a presentation discussing the proposed strategic objectives and received comments from the public on the drafting of the Strategic Plan.
- **Public notice distributing the draft Strategic Plan issued 31 August 2021:** Noticed invited comments from the public on all aspects of the Strategic Plan.
- **Board Meeting for Consideration of Adoption of Strategic Plan, 15 October 2021**

All the sessions conducted at Regional Board meetings were publicly noticed in accordance with requirements from the Bagley-Keene Open Meeting Act, including the translation of the Board's Public Meeting Agenda and other key materials (including the Survey) into Spanish. Notices were also widely distributed to multiple Board-managed email lists, prominently posted on Board's website, and often were circulated on various social media platforms. In addition, the Board's Executive Officer invited comment on the Strategic Planning process at multiple Tribal Summits, numerous engagement efforts conducted by the Central Valley Water Board as the CV-SALTS program was being implemented, during multiple State Water Board presentations, and at CV-SALTS Executive Committee meetings. Social media campaigns raising awareness of the process utilized Facebook and Twitter outreach.

**LCJA, et al. No. 3:** The Strategic Plan states that it includes a "frank assessment of the main challenges that programs face, to enhance transparency." The Strategic Plan then omits any discussion about the challenges facing the Central Valley Board. The commenter then goes on to cite several challenges that the commenter believes are present, including efforts under the CV-SALTS program to test wells.

**RESPONSE:** The challenges that are articulated in the Strategic Plan are long-term challenges, not problems that can be resolved in the next couple of years (such as potential near-term issues with the rollout of the CV-SALTS drinking water program). More short-term challenges are perhaps better addressed during the annual priority-setting exercise that the Board conducts in December. The Strategic Planning Committee and the Board's Executive Team invite LCJA et al. to meet with Board members and the Board's Executive Team to better address these more short-term challenges as part of our portfolio management process.

**LCJA, et al. No. 4:** The Strategic Plan must address wastewater consolidation efforts under SB 1215. We urge the Central Valley Board to include wastewater consolidation as part of its Strategic Plan. Currently, many drinking water systems are being consolidated throughout the region but efforts on wastewater are stalled. Many communities will continue to be inadequately served for wastewater, even though the State has worked to provide them with safe drinking water. We believe that these inequities must be addressed by the Central Valley Board and that it would be more efficient to work in tandem with the State Water Board to prioritize wastewater consolidation with drinking water consolidations.

**RESPONSE:** The Strategic Planning Committee appreciates the reference to the SB 1215 program and has made edits to the Strategic Plan to include references to the wastewater consolidation program. The Central Valley Water Board agrees with the commenter regarding problems within the wastewater sector that could be resolved through wastewater consolidations, and agrees that this program, which is currently starting to yield actionable projects, deserves to be referenced in the Strategic Plan. A lot of work is currently being done in this area in coordination with multiple State Water Board programs.