

Summary of Points Made by David Okita, Community Water Center

When reaching out to David Okita to see about participation by Community Water Center in the December workshops, he offered some observations about engaging with the EJ leaders and community. The following summarizes the points that he expressed.

Current Outreach Approach

CV-SALTS included EJ non-profits as participants in the PEOC since the beginning, and that participation was important. It makes sense now that the regulated community is the priority for outreach. **The EJ communities do not have the capacity for representative participation in CV-SALTS at the same level as the regulated community.** The EJ community is frustrated with the end results of the CV-SALTS program on some points (e.g., Management Zones), but understands that it will be implemented as it now stands—maybe with some minor tweaking.

Concern about Management Zones and Linking them with GSAs

The concern from the EJ community about Management Zones is based on their experience with GSAs. **Small communities are not getting an opportunity for much input** and have limited authority on GSA boards to represent their interests. **The EJ community's fear is that the same thing will happen with Management Zones.** EJ advocates understand that litigation is an option, a last resort, but that is not a preferred approach for addressing and resolving drinking water needs. Most communities will accept reasonable solutions to address the problem.

It makes sense that GSAs be linked to Management Zones, but GSAs are generally unaware of CV-SALTS at this time. They are focused on completing their GSPs and not ready to think about CV-SALTS as it is not yet approved. **The time to approach GSA's to link them to CV-SALTS is when they consider the 5-year revision to their GSPs**—by then there will have to be a better linkage to groundwater quality in some GSAs.

Funding Assistance for EJ Participation is Recommended

To achieve the CV-SALTS goal of ensuring safe drinking water supplies, the EJ communities should be involved as early as possible. The regulated entities won't be able to do this on their own. It will be important to provide funding assistance to EJ groups to represent their interests. This approach works in other regulatory processes. The State Water Resources Control Board (SWRCB) provides funds to non-profits through Technical Assistance grants to help communities study their needs and apply for funding for drinking water projects. The Department of Water Resources (DWR) and SWRCB fund non-profits to do SGMA outreach and advocacy. Without outside funding, nonprofits can't do much, and the communities are left out and resentful. Fortunately, with EJ groups, their costs are relatively low—compared to technical and legal consultants. **It is better to engage EJ communities now than pay the price of resentment later.**

The timing of the December Workshops

With the timing of the approval by the SWRCB not certain and discussions about Management Zones still occurring, we believe **it may be better to save outreach efforts until there is more certainty to CV-SALTS timing.**