

Comments and Responses from the DSE Guidelines Public Comment Period

Comment Number	Comment from 45-day public comment period	DWR's response to comment
1	I have a question about eligibility for the Dam Safety and Enhancements Grant Program. I am working for an agency that owns a high hazard DSOD jurisdictional dam. Up until now the reservoir has accommodated the design storm with dedicated flood storage, which fully contains the storm. However, recently DSOD has told them that they must also install a spillway. Since this is a requirement from DSOD is it fundable under the program?	Yes a requirement from DSOD is eligible, unless it is a requirement that has caused DSOD to take enforcement action on.
2	I understand that this program just began last year. I had a few questions about the resources that have been provided in the Program Guidelines and Draft Proposal Solicitation Package: 1. Will there be a webinar discussing the proposal solicitation when the solicitation is opened? 2. Is there a rough timeframe for when proposals will be solicited an when they will be due? 3. Bearing in mind that there haven't been earlier solicitation rounds (please correct me if I'm wrong, are there similar programs from DWR that are aligned with the objectives and expectations of the DSE program that have example successful proposal applications available for review by prospective applicants?	1. At this time the Department of Water Resources (DWR) does not have a webinar scheduled during the proposal solicitation period. If a webinar is scheduled information will be posted on the DWR DSE webpage, https://water.ca.gov/Work-With-Us/Grants-And-Loans/Dam-Safety-and-Enhancements-Program . 2. The estimated time for the proposal solicitation for the Dam Safety and Enhancements Grant Program is March through April, 2024. Additional information will be posted on the DWR DSE webpage when available, https://water.ca.gov/Work-With-Us/Grants-And-Loans/Dam-Safety-and-Enhancements-Program . 3. Being a pilot program DWR does not have any example submittals to share at this time.
3	I am reviewing the draft Guidelines and Proposal Solicitation Package for the Dam Safety and Enhancements Grant Program. The grant webpage indicates two virtual public meetings will be held, but I have not been able to find any information regarding these events. Is there any updates regarding these meetings?	Meetings were held in January 2024. Information was sent to commentor with links to sign up for the meetings.
4	I was reviewing the Draft Dam Safety and Enhancements Grant Program Proposal Solicitation Package and was wondering if DWR envisioned that grant funds could be used to construct downstream recharge projects or surface water projects to alleviate flooding or dam safety concerns downstream of a DSOD dam or other dam with concerns? In the Kaweah Subbasin we have pursued several projects that include alleviation of flood concerns by constructing offstream storage facilities and groundwater recharge facilities that take floodflows and either store them or put them in groundwater recharge facilities.	As per the Water Code section 6700 states that the funds can only be used for jurisdictional dams and associated facilities in service prior to January 1, 2023. Therefore, new construction is not eligible. Also, the new construction would result in increased water impoundment (even if temporary) which is not eligible through the DSE program.

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5	<p>As currently written, the Grant Program will provide funding for “repairs, rehabilitation, enhancements, and other dam safety projects” for dams that were in service prior to January 1, 2023. First and foremost, Grant Program funds should be available for dam removal, given the most cost-effective and permanent way to deal with obsolete, unsafe dams is to remove them. Nationwide, there are tens of thousands of dams that no longer serve their intended purpose and whose removal could eliminate the cost and liability associated with owning a dam. Unless dams are well-maintained, their condition only gets worse every year. Removal is one way to address a failing dam while permanently eliminating any associated safety risks. Conservation Organizations understand the Grant Program’s prioritization of restoring water supply capacity at existing projects throughout the State. Consequently, we suggest that alternatives to on-channel storage be paired with dam removal to further the climate resilience of the State’s water supply projects. Such alternatives may include flood managed aquifer recharge projects, the installation of infiltration galleries, and the co-location of diversion points to reduce the volume of in-water infrastructure that puts our communities and biodiversity at risk. By funding multi-benefit dam removal projects, which incorporate upgraded diversion infrastructure and climate resilient water supply alternatives, the Grant Program would encourage the development of projects that meet the following priorities of the Grant Program Guidelines:</p> <p>A. Additional Eligibility Criteria (Guidelines section 3.5), including: (1) addressing dam safety issues; (2) taking into account the current and future impacts of climate change, such as increased storm severity, which may overwhelm outdated dam design,1 high temperatures associated with surface water evaporation, and methane emissions associated with reservoirs; and (3) promoting the State’s planning priorities, including the implementation of the 30x30 initiative and Sustainable Groundwater Management Act. Additional Implementation Project Considerations (Guidelines section 4.1), including: (1) permanently reducing risk intensification to downstream communities, which may continue to grow in size due to lower real estate values associated with floodplain development; (2) protecting and enhancing existing natural habitats, or providing new ones, particularly climate refugia for endangered salmonid species; (3) protecting and enhancing water quality by eliminating dams and reservoirs, which exacerbate climate-related threats by raising water temperature, reducing dissolved oxygen, causing harmful algal blooms, and releasing methane; (4) restoring natural fluvial and related biological processes, including protecting riparian habitats through habitat reconnection and restoration; and (5) creating opportunities for groundwater recharge.</p>	<p>Dam removal was included in the original legislative counsels analysis wording but was removed when it went into the SB 122. DWR interprets the language removal to mean that dam removals are not eligible. DWR needs legislature action to include dam removal as a project.</p>

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6	<p>The Grant Program Guidelines should incorporate criteria for evaluating when dam removal, rather than repair, will be funded. California infrastructure includes wellmaintained dams that are critical to California’s water supply and public safety. “The public depends on them for 70% of state’s water supply, 15% of the power, as well as for flood control, recreation, fisheries and wildlife habitat.”² However, dams are not designed to last forever, and deferring dam maintenance can jeopardize downstream communities. In fact, the American Society of Civil Engineers’ 2019 infrastructure report card gave California dams a C-, mainly based on age and hazard status.³ In instances where dam maintenance has been deferred for a lengthy period, the cost of dam rehabilitation may often outweigh the cost of dam removal. Where this is the case, the most effective way to address a failing dam is dam removal. Removal improves public safety by permanently eliminating the risk of failure to downstream communities and to river users. Removal also eliminates the need for ongoing maintenance and liability for dam owners. Dam removals restore natural river conditions, revitalizing fisheries and enhancing river flows and associated opportunities for recreation. Where the cost of dam repair exceeds the costs of removal, removal should instead be funded, allowing for extensive river restoration.</p>	<p>Dam removal was included in the original legislative counsels analysis wording but was removed when it went into the SB 122. DWR interprets the removal of this as dam removal not being eligible and would wait for legislature action to include dam removal as a project.</p>
7	<p>The Grant Program Guidelines should prioritize funding repairs, rehabilitation, enhancements, and other dam safety projects for dams that are aged 50 years or more. According to the Association of State Dam Safety Officials, the average life expectancy of a dam is 50 years. Once a dam reaches 50 years of age, enhanced maintenance and investment is required to protect downstream communities, which have grown significantly in size since the development of California’s water infrastructure.⁴ “Over half of California’s 1,476 state, federal and locally owned dams are considered high hazard dams, meaning their failure would result in probable loss of human life and economic damage. Approximately 70% of the dams are greater than 50 years old.”⁵ Given the age and downstream hazard potential associated with a majority of California’s dam, repair of ageing structures should be prioritized for funding through Grant Program criteria.</p>	<p>The DSE program will use the DSOD downstream classification and condition assessment of the dam to prioritize funding and feel that a prioritization of age would not accuracy direct funding in many circumstances.</p>
8	<p>The Grant Program Guidelines should increase the match reduction provided for projects that contribute to environmental enhancement at the dam or downstream and upstream from the dam. Currently, the Guidelines provide only a maximum 5% match reduction for such projects. However, projects that provide environmental enhancements further numerous of the State’s objectives related to climate resilience and salmonid recovery. In fact, projects that provide environmental and habitat enhancements have the potential to address the recovery of salmonids listed under the federal and/or State Endangered Species Act (“ESA” and “CESA,” respectively). Moreover, projects that address habitat rehabilitation and enhancement are typically associated with lower permitting costs, given availability of streamlined permitting options and ease of compliance with ESA and CESA.</p>	<p>The Guidelines have been updated to reflect that projects that contribute to environmental enhancement at the dam or downstream and upstream from the dam are eligible for up to a 7% cost share reduction amount. This amount is increased from 5%.</p>

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9	Expressly Allow Multiple Grant Awards – Section 5 (Page 4) of the Guidelines directs how funds will be awarded and establishes the requirements for the local cost share. The Guidelines should expressly state the ability of projects to qualify for multiple grants awards from the Program as future state appropriations become available. Dam projects are costly and can take a decade or more to complete. The current funding of \$100 million, proposed to be reduced by half in the Governor's January Budget, will not likely result in awards that would reach the 50 percent cost share for hundred-million- or billion-dollar projects. Allowing projects to qualify for multiple grants awards from the Program up to the 50 percent cost share will help meet the needs of the projects over time. A modest grant in 2024 should not preclude larger grants in the late 2020s or early 2030s.	A dam would continue to be eligible in future years. We have added language "A dam that is awarded funding would remain eligible to apply for future years of this program so long as all other program requirements are satisfied." to the guidelines.
10	Dam Safety Projects Are Mandated Compliance – Section 6.1 (E) (Page 5-6) of the Guidelines regarding Eligible Project Costs indicate eligible project costs do not include "Support of existing agency requirements and mandates." Generally, state environmental grant programs do not fund mitigation for environmental impacts, as those elements are usually in addition to the planned improvements that are part of a project. However, dam safety projects and their costs to ratepayers often include sizable mitigation components stemming from the in-stream work inherent in these projects. Water Code Section 6700, implementing the Program, expressly states a priority of the program is "Enhancement, protection, or restoration of habitat for fish and wildlife." This is exactly what environmental mitigation does, and the cost of mitigation should not be excluded from eligibility. The Anderson Dam project is being constructed under a mandate from the Federal Energy Regulatory Commission (FERC) to retrofit the dam and keep the reservoir empty until the project is completed. Under the proposed sentence quoted above, no project could qualify for the program if there is a standing dam safety order for repair. Due to the long planning horizon, high costs, and cumbersome permitting processes, DWR likely will have ordered dam repair before a project would have permits to proceed with construction. In short, few projects would be able to escape a state or federal mandate to repair the dam or avoid instream impacts that require costly mitigation. We urge that the Program allow grant eligibility for all the actual costs of a dam safety project, regardless of regulatory orders, requirements, or mandates.	Guidelines Section 6.1 updated from "E.Support of existing agency requirements and mandates" to "Support of existing agency requirements and mandates by enforcement action by DSOD."
11	Project Completion - The PSP under "Proposal Solicitation and Ranking Process" (Page 1) would require "All activities associated with projects must be completed prior to June 2028." This timeline is highly problematic as it is far too short. Dam rehabilitation projects are very complex. For example, our Anderson Dam project team is currently working with 13 regulatory agencies and those agencies mostly lack any public safety or water supply responsibility which would add urgency to their efforts. Valley Water has been in pre-consultation with the regulatory agencies for five years, and we still do not have a final EIR or permit applications submitted. The current phase 1 Anderson Dam construction was only possible as an emergency action. While Valley Water would welcome an expedited permit processing timeline that could achieve project completion within two years, it is currently all but impossible. As such, a longer timeline of ten years should be provided.	DWR is unable to extend the timeline of the program as set forth by the legislature. DWR encourages owners to break projects up into smaller projects that can be completed on a lesser schedule.
12	For sediment removal projects due to fire, is there a timeframe from the time of fire to cleanout?	There is no current timeframe from a wildfire or storm event, and DWR asks applicants to provide their best data to show that the sediment buildup is from the event.

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13	Should applicants provide funding info for all dams they own within their jurisdiction or just numbers on the specific project dam?	If a dam owner is looking to participate in the possibility of cost share reduction, information for all dams would be needed to evaluate an owners ability to pay.
14	What is the minimum length of time the solicitation will be open for submittal?	A minimum of 30 days
15	With a March solicitation, what would the deadline for submitting proposals be?	Anticipating April or May.
16	If potential applicants have questions about their projects, is it best to wait until after the solicitation is released?	Potential applicants can reach out to the DSE email with questions anytime
17	Will there be a NOFO that will be published soon?	Anticipated March
18	Funds are to be expended by 2028, does that mean project needs to be completed by then?	The entirety of the project does not need to be complete, but DSE grant funds do need to be expended on eligible costs by 2028.
19	Will there be quarterly progress reports for this grant?	Yes
20	Are these funds eligible to be used as a federal cost share for other grants (i.e: HHPD)	Yes, as long as the other grant allows this. HHPD does allow this.
21	Section 2: Please consider adding language to the last sentence: "...that addresses identified dam safety deficiencies, or provides enhancement of dam safety where no deficiencies have been previously noted."	DSE Guidelines, Section 2 have been updated to include "removes sediment that resulted from a wildfire or extreme storm event, or provides enhancement of water supply reliability".
22	Section 3.2 Eligible project Types: Please consider adding a new subsection G. Improvements or enhancements of dam safety and performance monitoring or associated instrumentation systems.	Instrumentation and monitoring does not fit into the current categories and we would suggest looking at other sources of funding for this project.
23	Section 3.5 Additional Eligibility Criteria: Please consider adding a new subsection G. Commit to a public communications plan about dam safety.	Adding this does not fit well with the current DSE program.
24	Page 1 Section 2 of Draft Program Guidelines- Proposals submitted shall include a detailed statement to demonstrate how the proposed dam safety project has a clear and definite purpose that addresses identified dam safety deficiencies. SB 122 provides funding availability for variety of dam safety and enhancement project categories and does not indicate eligibility is based on addressing identified dam safety deficiencies. Recommend revising requirements for the detailed statement to be inclusive of all listed dam project categories, such as "enhancement of water supply and downstream flood risk reduction" and "one-time projects to remove sediment" and allow for consideration of projects at dam facilities that do not have identified dam safety deficiencies.	DSE Guidelines, Section 2 have been updated to include "removes sediment that resulted from a wildfire or extreme storm event, or provides enhancement of water supply reliability".

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25	<p>Page 3 Section 3.5 of Draft Program Guidelines- Projects should address dam safety related deficiencies and deficiencies that have resulted in reservoir restrictions being implemented.</p> <p>SB 122 provides funding availability for variety of dam safety and enhancement project categories and does not indicate eligibility is based on addressing identified dam safety deficiencies or reservoir restrictions. Recommend revising eligibility criteria to be inclusive of all listed dam project categories, such as "enhancement of water supply and downstream flood risk reduction" and "one-time projects to remove sediment" and allow for consideration of projects at dam facilities that do not have identified dam safety deficiencies or reservoir restrictions.</p> <p>Is there any additional eligibility criteria or guidance for the "enhancement of water supply and downstream flood risk reduction" or "one-time projects to remove sediment" category of projects included under this Program?</p>	<p>DSE Guidelines, Section 2 have been updated to include "removes sediment that resulted from a wildfire or extreme storm event, or provides enhancement of water supply reliability". For eligible projects that do not have an identified dam safety deficiency or reservoir restriction, Section 3.5-A does not apply to the project.</p> <p>The project shall meet all other additional eligibility requirements as listed in Section 3.5.</p>
26	<p>Page 1 Proposal Solicitation and Ranking Process of PSP Package- All activities associated with the projects must be completed prior to June 2028.</p> <p>Dam rehabilitation and enhancement projects typically require a long duration to implement due to complex planning, design, environmental, regulatory permitting, and construction processes. The proposed June 2028 deadline is too short for projects which are currently in development and may be too short for "shovel ready" project which have lengthy construction durations. Recommend extending the deadline to Fall 2032 or providing for a phased long-term timeline for projects that are requesting funding for multiple activities (e.g. Admin, Planning, Design, Construction).</p> <p>Any deadline associated with project activities should not include any environmental mitigation necessary to offset project impacts as on-site mitigation sometimes cannot be completed until after the project is completed.</p>	<p>DWR is unable to extend the timeline of the program as set forth by the legislature. DWR encourages owners to break projects up into smaller projects that can be completed on a lesser schedule.</p>
27	<p>Page 1 Proposal Solicitation and Ranking Process of PSP Package- Adopted and certified original of Appendix A- Authorizing Resolution. It may not be possible for applicants to provide an adopted Authorizing Resolution within the timeframe allowed for submitting a proposal, as the process for obtaining an Authorizing Resolution can take up to six months. Recommend that inclusion of a adopted Authorizing Resolution be an optional requirement for the proposal.</p>	<p>Applicants should provide authorizing resolution status at the time of submittal. A complete Authorizing Resolution must be submitted before projects are awarded. can use a resolution example. DWR needs to know that the authorizing body can work with us.</p>
28	<p>Page 3 Table C-1 Project Scoring Criteria of PSP Package- B. The extent to which the applicant can demonstrate the project meets the following: Addresses one or more of the dam's deficiencies (Up to 20 points) Will result in the dam's condition assessment being upgraded to "Satisfactory" by DSOD (Up to 20 points)</p> <p>The proposed scoring criteria is weighted heavily in favor of projects at dam facilities that have a condition assessment below "Satisfactory" and address existing dam deficiencies. This criterion severely disadvantages any proposed dam safety project at a "Satisfactory" dam facility and all but eliminates the competitiveness of the "enhancement of water supply and downstream flood risk reduction" or "one-time projects to remove sediment" category of projects. Recommend scoring criteria be revised to be inclusive of, and provide equitable competitiveness, for "Satisfactory" dam facilities and all project categories as listed in SB 122.</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>

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29	<p>The second sentence of Guidelines Section 2 states that proposals shall demonstrate how the project “addresses identified dam safety deficiencies”. The appearance of this language here under the title “eligible funding recipients” suggests that a project is not eligible if it doesn’t identify an identified deficiency. However, the subject language addresses proposal content and not the entities themselves. In fact, California Water Code (CWC) §6700(b) lists 6 different types of projects eligible for funding, only the last of which (§6700(b)(6)) refers to safety deficiencies, as echoed by Guidelines Section 3.2(F). To best achieve the legislative purpose of the Dam Safety and Climate Resilience Local Assistance Program “to provide state funding for repairs, rehabilitation, enhancements, and other dam safety projects...” (emphasis added), please strike the second sentence of Guidelines Section 2, or place it at the end of Guidelines Section 3.2(F).</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>
30	<p>Guidelines Section 3.2 lists Forecast-Informed Reservoir Operations (FIRO) as an eligible project type. This should be carried forward into the PSP and specifically into the PSP Project Scoring Criteria. The logical place to do this would be in Criterion C, which lists “Restoration of water storage (Up to 10 points)”. FIRO projects should be eligible for the same 10 points because FIRO achieves the same objective – retention of storage – while staying consistent with the limitation in the Water Code (Section 6700(d)) and the Guidelines that grant funds will not be awarded for raising dams or enlarging reservoirs. Without this change, the criteria disfavor FIRO, which will make it hard to fulfill the intent of the CWC as well as state policy as expressed in Governor Newsom’s Executive Order N-10-19 and the subsequent Proposal 27.3 in the Water Resilience Portfolio.</p>	<p>Eligible projects should achieve one or more of the project benefits listed in the DSE Guidelines - Section 3.3. The applicant should provide sufficient information on how an eligible project achieves one or more of the project benefits. Eligible projects can receive up to 35 points in the PSP Table C-1 (Project Scoring Criteria), Criterion C for achieving project benefits.</p>
31	<p>Guidelines Section 3.5 adds eligibility criteria that are not specified in CWC §6700. If these criteria are applied as eligibility criteria, they would make ineligible many projects otherwise consistent with the purpose of the law. To best achieve the legislative purpose of the Dam Safety and Climate Resilience Local Assistance Program and avoid disqualifying projects that are expressly listed as eligible in CWC §6700(b), these criteria should be deleted or moved and treated as Additional Considerations in Guidelines Section 4.1.</p>	<p>DWR has reached out to commentor for clarification.</p>
32	<p>PSP Table C-1 criterion B proposes scoring criteria that, if I read it correctly, would mean that the maximum score a project involving a dam with a “Satisfactory” DSOD condition assessment could get would be 60%. As a practical matter, it is likely that the scores for selected projects will exceed 60%. Therefore, the likely awards may not be representative of the diversity of project types sought by the program and listed as eligible. For example, although the legislature listed Forecast-Informed Reservoir Operations (FIRO) as eligible projects, their utility is limited to certain watersheds and dams. If those are all “satisfactory,” it will be hard for DWR to make an award to one of them. This is similar to the comment made by an individual from Los Angeles County in today’s webinar who felt like removal of material from active debris basins would not be competitive, notwithstanding their inclusion as eligible projects in the law and in the Guidelines. Please consider reducing the maximum score under criterion B by at least ten points and distributing those points to other criteria that will allow the full suite of project types named eligible by the legislature to have a chance of funding</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>

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33	<p>Section 1 (“Program Description and Funding Authority,” p. 1): We encourage this description of the program to be expanded to highlight the broad nature of the public benefits intended to be supported by the program; see Water Code sec. 6700(c). Section 1 of the draft Guidelines primarily discusses dams with a condition assessment of less than “Satisfactory” as assigned by DSOD and the associated needs of those facilities. It is critical to note that the authorizing statute includes no reference to, or specific requirements associated with, existing condition classifications. While dam condition may be a relevant factor for purposes of administering the DSEP, it should not be inappropriately emphasized.</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>
34	<p>Section 3.5. (“Additional Eligibility Criteria,” p. 3): Section 3.5.A. currently provides that “[p]rojects should address dam safety related deficiencies and deficiencies that have resulted in reservoir restrictions being implemented.” As noted above, DSEP’s authorizing statute does not include any reference to existing condition ratings; accordingly, they should not be utilized to determine project eligibility. Using condition rating as an eligibility criterion for DSEP is inappropriate and contrary to the intent of the program to advance the public benefits identified in the authorizing statute without reference to condition ratings. Section 3.5.A. should be removed or clarified to ensure that it does not inappropriately limit the eligibility of projects.</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>
35	<p>Proposal Solicitation and Ranking Process (p. 1): The description of the Proposal Solicitation and Ranking Process includes the following statement: “All activities associated with the projects must be completed prior to June 2028.” Consistent with the form of the reimbursement agreements envisioned in Appendix C, this statement should be clarified to indicate that all activities associated with reimbursable costs under the agreement must be completed by a certain date.</p>	<p>The entirety of the project does not need to be complete, but DSE grant funds do need to be expended on eligible costs by 2028.</p>
36	<p>Table C-1 A. (Hazard Classification): Given the authorizing statute’s prioritization of the protection of public safety, it is appropriate to award points based on hazard rating. DSOD defines hazard based on potential downstream impacts to life and property in the event of dam failure, with a “high hazard” dam “expected to cause loss of at least one human life” and an “extremely high hazard” dam “expected to cause considerable loss of human life or would result in an inundation area with a population of 1,000 or more.” The existing definition of “extremely high” hazard dams covers a broad range of potentially impacted populations. We recommend that Table C-1 A. be revised to include graduated scoring based on potentially impacted populations for extremely high hazard dams. Such an approach would account for the broad range of populations at potential risk and the magnitude of public benefits provided by a project.</p>	<p>DWR feels the points for these categories represents the goal of the program.</p>
37	<p>Table C-1 B. (Deficiencies and Condition Assessment): As discussed above, DSEP’s authorizing statute does not include any reference to existing condition ratings, yet Table C-1 B. proposes to make condition rating and deficiencies the single largest factor used in the evaluation and scoring of projects. This is contrary to the intent of the program, which should be focused on advancing the public benefits identified in the authorizing statute, placing primary emphasis on the protection of public safety. We strongly urge that Table C-1 B. be revised to reduce or eliminate the maximum score associated with these criteria, and to instead assign those points to the public benefits specifically included in the authorizing statute and included in Table C-1 C., based on the magnitude of public benefits provided.</p>	<p>DWR has adjusted the points in Table C-1 of the PSP and removed the Satisfactory criteria.</p>

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38	<p>Table C-1 C. (Public Benefits): The authorizing statute specifically defines six categories of public benefits “in order of priority.” (Water Code sec. 6700(c).) Table C-1 C. functionally conflates several of these public benefit categories by assigning them equal points; e.g. “protection of public safety” and “restoration of water storage” are both eligible for “up to 10 points,” and “flood risk reduction” and “enhancement of water supply reliability” are both eligible for “up to 5 points.” This conflation of different public benefit categories is contrary to the clear direction provided in the authorizing statute.</p> <p>We recommend that Table C-1 C. be revised to reflect the clear prioritization of public benefit categories defined in Water Code section 6700(c), placing primary emphasis on the protection of public safety.</p>	Table C-1 C has been adjusted to reflect priority of the CWC 6700.
39	Table C-1 D. (Project Benefits to Communities): We recommend that the “thresholds” included in the various loss and risk categories be clearly identified.	The thresholds included in Table C-1, D come from the Climate and Economic Justice Screening Tool. For detailed information on the categories you can visit the Climate and Economic Justice Screening Tool website (https://screeningtool.geoplatform.gov/en/). The PSP has been updated to include a footnote referencing that these thresholds come from the Climate and Economic Justice Screening Tool.
40	Table C-1 E. (Proposal Completeness Assessment): We recommend that consideration be given, in Table C-1 E. or elsewhere in the project criteria, to the implementability of projects to be funded under the DSEP.	DWR does not feel that Table C-1 E represents how implementable a project is well enough to increase point totals here.
41	Program name should be in line with naming convention as stated in the legislation.	DWR has updated the name of the program to match the legislation.
42	<p>We believe this statutory guidance is important, including the consideration of “associated facilities” as eligible for funding from this program. While neither the statute nor the regulations define “associated facilities”, we believe a project should be eligible for funding if it meets the statutory criteria that it reduces flood risk downstream from the facility. Specifically, we believe standalone upstream basins, which reduce downstream flood risk at state jurisdictional dams, should be eligible for funding and the funding guidelines should make clearer their eligibility.</p>	Associated facilities would typically be facilities that fall under the jurisdiction of DSOD.