

Staff Response to Written Public Comments

Assembly Bill 1096 Policy Handbook

No	Commenter	Summary of Comments	Response to Comments
1	Association of California Water Agencies	The commenter recommends that State Water Resource Control Board Division of Drinking Water (DDW) clearly defines the Assembly Bill 1096 (AB 1096) Handbook's intended legal effect, scope, and relationship to existing statutory and regulatory requirements, coordinate with the California Department of Social Services (CDSS) to avoid overlapping requirements and develop a summary table that outlines how the AB 1096 Handbook aligns with and differs from prior program requirements.	DDW staff are coordinating with the CDSS to avoid duplicative requirements and will take the commenter's recommendations into account during development of the AB 1096 Policy Handbook.
		The commenter recommends that the AB 1096 Handbook recognizes the operational constraints and access limitations public water systems face in implementing lead sampling at schools and child care facilities and provides flexible guidance that accounts for site-specific access constraints, resource limitations, resource limitations, and variability across facility types.	DDW staff will take the commenter's recommendations into account during development of the AB 1096 Policy Handbook.

		The commenter recommends that the AB 1096 Handbook includes a phased implementation approach and provides clear, standardized guidance on sampling methods and frequency, fixture selection, notification, and coordination requirements to reduce uncertainty and limit inconsistencies across systems.	DDW staff will take the commenter's recommendations into account during development of the AB 1096 Policy Handbook.
		The commenter recommends that the AB 1096 Handbook more clearly addresses the need for appropriate funding and alignment of responsibilities with available authority and resources. The commenter also noted potential confusion regarding cost responsibilities of child care facilities and public water systems.	DDW staff will take the commenter's recommendations into account during future outreach and development of the AB 1096 Policy Handbook.
2	Alameda County Water District	The commenter recommends the State Water Board provide exemptions or waivers to community water systems for child care lead sampling due to sampling already being conducted under an existing State program.	DDW staff are evaluating a waiver process for community water systems that have conducted lead sampling at child care centers in compliance with AB 2370.
		The commenter recommends the State Water Board consider water affordability to be strongly weighed when identifying funding sources for the implementation of new requirements under the LCRI and AB 1096.	DDW staff have informed the Division of Financial Assistance of this comment. Funding is available to community water systems and non-profit non-community systems to

			complete lead service line identification and replacement. For more information, please refer to the Lead Service Line Replacement Funding Program webpage .
3	Children Now	The commenter recommends that all child care facilities, including family day care homes, be included in lead sampling requirements with no option for a waiver to address inequities in the risk of lead exposure and ensure that facilities serving children from low-income families are not left out of lead sampling requirements.	DDW staff will consider the comment when evaluating the potential for a waiver process.