



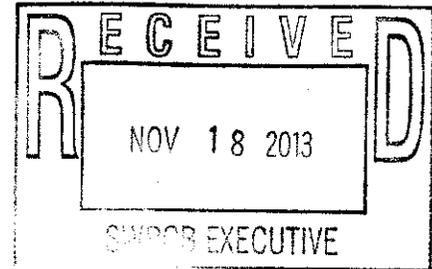
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October 30, 2013

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RE: Transfer of Drinking Water Program from CDPH to the State Water Resources Control Board

Dear Dr. Chapman:

Since the Governor made a decision to transfer the entire Drinking Water Program from CDPH to the State Water Resources Control Board independent of the fate of AB145, CCLHO representatives have been participating in the Governor's "Drinking Water Reorganization Task Force". Recently, at a Task Force meeting, CCLHO representatives were asked if CCLHO would change the CCLHO position to reflect favorably on the proposed move of the entire Drinking Water Program and if CCLHO would provide input on changes needed to improve to the Drinking Water Program.

As you recall, on May 10, 2013, CCLHO wrote you a position letter regarding AB145 (Perea) State Water Resources Control Board: drinking water. The CCLHO position letter stated if the Drinking Water Program was moved that:

- Only the Drinking Water revolving fund program should be transferred to the Water Board.
- All regulatory, permitting and drinking water standards of the Drinking Water Program should remain with CDPH including determination of MCL's.
- Adequate funding to maintain a robust Drinking Water Regulatory Program should be provided to CDPH (in an amount no less than that provided for this purpose by the Revolving Fund).

At its semi-annual meeting on October 23, the CCLHO Board voted to maintain its position as outlined in the May 10 letter. CCLHO continues to maintain that it would be a serious error with negative health consequences to the public if the Drinking Water Program is transferred as planned from Public Health oversight.

The rationale for CCLHO Board members to maintain their position was as follows:

1. Only the disbursement of Revolving Fund monies has been a problem with the small systems in disadvantaged communities.
2. The regulatory aspect of the Drinking Water Program as executed by CDPH continues to function well.
3. Drinking Water is a Public Health Program, not an environmental protection program.
4. Only CDPH is in a position to protect Drinking Water with its Public Health resources in disease outbreak investigation, Public Health Emergency Preparedness Program, and epidemiology skills.
5. The State Water Board is very experienced in administering Revolving Fund monies since they administer such funds for waste water treatment systems.
6. One of the factors in the slow progress with small systems has been chronic underfunding of the Drinking Water Program at CDPH.

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7. CCLHO sees this as a viable compromise position, which is more desirable than transferring the entire Drinking Water Program.

With respect to the question of how best to improve the Drinking Water Program, CCLHO provides the following input:

- Approximately 98% of California population is served by viable, permitted water systems providing water that meets drinking water standards. This information has been available for some time and was presented to the Drinking Water Reorganization Task Force on October 16. Disruption of this functional program by transferring it from CDPH would be detrimental.
- The remaining 2% of the population includes communities served by small water systems, some of which are financially stressed in their attempts to maintain operation and obtain needed loans and grants for improvement. Many of these systems serve disadvantaged communities with sub-standard water sources. Therefore, the most pressing need for improvement in the Drinking Water Program is provision of all **the help needed** (including but not limited to funding, technical expertise, and creative solutions including connection to other, larger water systems) to these communities on an urgent, short time-frame.
- CCLHO believes that every citizen and visitor to California should have universal access to high quality drinking water.

As you know, the California Conference of Local Health Officers (CCLHO) is an organization of all legally appointed physician Health Officers in California's 61 city and county jurisdictions established by statute in 1947 to consult with, advise, and make recommendations to the California Department of Public Health (CDPH), other departments, boards, commissions and officials of federal, state and local government, the Legislature, and any other organization or association on matters affecting health.

As such, CCLHO will continue to provide representation to the Drinking Water Reorganization Task Force to provide the Public Health perspective and local public health expertise, as needed, and to facilitate the best outcome of this process for all California residents.

Thank you for your consideration. If you have questions, please feel free to contact me at [Muntu.Davis@acgov.org](mailto:Muntu.Davis@acgov.org) or (510) 267-8010.

Sincerely,



Muntu Davis, MD, MPH  
President  
California Conference of Local Health Officers

cc: Felicia Marcus, Board Chair  
Water Resources Control Board

Thomas Howard, Executive Director  
Water Resources Control Board