

LH



CALIFORNIA-NEVADA SECTION

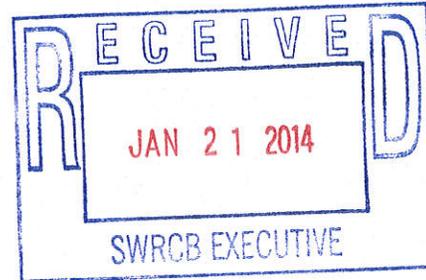
American Water Works Association

Leading. Educating. Serving.

January 15, 2014

The Honorable Diana S. Dooley, Secretary
California Health & Human Services Agency

The Honorable Matthew Rodriguez, Secretary
California Environmental Protection Agency



Dear Secretaries Dooley and Rodriguez:

The California-Nevada Section of the American Water Works Association (AWWA) appreciates the opportunity to participate on the Drinking Water Reorganization Task Force (Task Force) and provide input on transitioning the Drinking Water Program (DWP) from the California Department of Public Health (CDPH) to the State Water Resources Control Board (SWRCB). With over 4,700 members in this state, AWWA has been a significant source of information on drinking water matters in California for more than 90 years. We thank the Administration for its care to openly and collaboratively include our representative among the stakeholders to address issues concerning the reorganization of the DWP.

The Administration's January 3, 2014, proposal fairly reflects the materials presented to the Task Force. This letter highlights a few additional recommendations that do not appear to have been considered.

First, we strongly encourage the Administration to consider establishing in statute two permanent advisory groups to assist the SWRCB with the DWP. One would be a California Drinking Water Advisory Council of stakeholders representing the full range of public interests. This would include consumer groups, public health providers, drinking water agencies, professional organizations, and the public at large. This group should continue the work of the Drinking Water Task Force regarding the transition, and then provide long-term, on-going conversation with the SWRCB on drinking water matters. Tasks should include:

- providing practical and independent advice on matters and policies related to drinking water quality and public health protection;
- maintaining an awareness of developing issues and problems in the drinking water area and advising the DWP on emerging issues;
- advising on regulations and guidance documents;
- recommending policies with respect to the promulgation of drinking water standards; and

10435 Ashford Street • Rancho Cucamonga, CA 91730

Office (909) 481-7200 • fax (909) 481-4688

www.ca-nv-awwa.org

- proposing actions to encourage cooperation and communication between the DWP and other governmental agencies, interest groups, the general public, and technical associations and organizations on drinking water quality.

Continued collaborative stakeholder participation would ensure the Administration's goals for the transfer are achieved. More importantly, such a council could assist with addressing the continuing issues regarding full access to safe and reliable water to all.

The second group would be a Scientific and Technical Advisory Board. Such a board would function to provide information and review draft regulations and support documents. As it stands now, the DWP lacks transparency in its regulatory development and lacks resources for the full use of available scientific and technical information. Tasks for this Board could include:

- reviewing the quality and relevance of the scientific and technical information being used or proposed as the basis for drinking water regulations;
- reviewing research and grant programs;
- reviewing generic approaches to regulatory science, including guidelines governing the use of scientific and technical information in regulatory decisions;
- advising the DWP on broad scientific matters in science, technology, social and economic issues; and
- advising the DWP on emergency and other short-notice programs.

Second, we ask that the Administration address DWP resource limitations as part of the transfer. There is a clear need to expedite the hiring process, especially positions funded by water system fees, such as district engineers and their staffs. There is also a need to increase regulatory development staff to address the DWP's substantial backlog. Provision for training and professional development is also necessary.

This may require reconsideration of the funding mechanisms for the DWP, the current form leading to inequities in service to small water providers and their communities. We recognize that there are multiple legacy issues that must be worked through as part of this transition and strongly encourage that adequate staffing and other funds be provided to ensure that the SWRCB has the capacity to make this transition and subsequent DWP operations a long-term success.

AWWA thanks you again for the opportunity to participate in the Drinking Water Reorganization Task Force and to provide comments at this time. We will continue to offer our technical knowledge and educational resources to you. We also appreciate the work of CDPH and SWRCB staff that convened the well-planned and managed meetings.

Sincerely,



Timothy Worley, PhD
Executive Director

cc: Hon. Ron Chapman, CDPH
Hon. Felicia Marcus, SWRCB
Kathleen Billingsley, Health and Human Services Agency
Mr. Tom Howard, SWRCB
Ms. Liz Haven, SWRCB