



1615 Capitol Ave., Suite 73.771  
P.O. Box 997377, MS 7003  
Sacramento, CA 95899-7377  
<http://www.cclho.org>

PHONE: 916.440.7594  
FAX: 916.440.7595  
[Roberta.Lawson@cdph.ca.gov](mailto:Roberta.Lawson@cdph.ca.gov)

**Roberta Lawson**  
RDH, MPH  
*Executive Administrator*

January 16, 2014

#### Officers

Muntu Davis, MD, MPH  
President  
Alameda County

Karen Smith, MD, MPH  
President-Elect  
Napa County

Bela Matyas, MD, MPH  
Treasurer  
Solano County

Eric Handler, MD, MPH  
Secretary  
Orange County

Janet Berreman, MD, MPH  
Legislative Coordinator  
City of Berkeley

S. Todd Stolp, MD  
Regulations Coordinator  
Tuolumne County

Wilma Wooten, MD, MPH  
Past President  
San Diego County

#### Directors-at-Large

Tomas Aragon, MD, DrPH  
San Francisco City/County

Penny Borenstein, MD, MPH  
San Luis Obispo County

Kenneth Cutler, MD, MPH  
Sierra/Trinity Counties

Olivia Kasirye, MD, MPH  
Sacramento County

Cameron Kaiser, MD  
Riverside County

Mark Lundberg, MD, MPH  
Butte County

Maxwell Ohikhuare, MD  
San Bernardino County

Lynn Silver Chalfin, MD, MPH  
Sonoma County

Diana S. Dooley, Secretary  
California Health and Human Services Agency  
1600 9th St #460  
Sacramento, CA 95899-7377

RE: Transfer of Drinking Water Program from the California Department of Public Health (CDPH) to the State Water Resources Control Board

Dear Secretary Dooley:

The California Conference of Local Health Officers (CCLHO) remains concerned that there will be negative health consequences to the public if the Drinking Water Program is transferred from Public Health oversight to the State Water Resources Control Board. We appreciated the opportunity to provide a public health perspective on the Drinking Water Reorganization Task Force and wanted to provide you with some additional recommendations and input on the Program's move.

We recommend that the Drinking Water Program Director meet the following required qualifications:

1. Candidate be currently registered in California as a Registered Environmental Health Scientist; and
2. Candidate possess at least five years of experience in Public Health/Drinking Water activities at the supervisory level; and
3. Candidate must have either a Masters Degree in Public Health or an approved equivalent graduate degree (Masters in Public Administration, PhD in Environmental Science, MD, etc.) OR 12 years or more of approved work in a field with direct Public Health experience.

We provide the following input on how best to improve the Drinking Water Program:

- Approximately 98% of the 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.

Diana S. Dooley, Secretary  
Page 2  
January 16, 2014

As background, the rationale for CCLHO Board members to maintain this position is 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 Resources Control 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.
7. CCLHO sees the transfer of the Revolving Fund only as a viable compromise position, which is more desirable than transferring the entire Drinking Water Program.

As you know, 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.

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,

A handwritten signature in blue ink, appearing to read 'Muntu Davis MD, MPH', with the letters 'MD, MPH' written in a smaller font to the right of the signature.

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

cc: Ron Chapman, MD, MPH, Director  
California Department of Public Health

Kathleen Billingsley, Chief Deputy Director for Policy and Programs  
California Department of Public Health