SUMMARY OF WRITTEN COMMENTS AND RESPONSES TO COMMENTS ON THE PROPOSED 1,2,3-TRICHLOROPROPANE MAXIMUM CONTAMINANT LEVEL REGULATIONS

The following notes will facilitate review of the following "Summary of Comments and Responses to Comments on the Proposed 1,2,3-Trichloropropane Maximum Contaminant Level Regulations" and the attached "Final Response to Comments for Proposed 1,2,3-Trichloropropane (1,2,3-TCP) Maximum Contaminant Level (MCL) Regulations".

Note 1:
The written comment period for the proposed 1,2,3-trichloropropane (1,2,3-TCP) maximum contaminant level (MCL) regulations began on 4 March 2017 and ended at 5:00 p.m. 21 April 2017.

Draft initial responses to all oral and written comments received prior to the 21 April 2017 close of the comment period were provided as part of the agenda materials for the 18 July 2017 State Water Board hearing.

Staff and Board member responses to oral comments made during the 18 July 2017 Board hearing are available in the audio/video file of that meeting.

Note 2:
Parties from whom written comments were received are listed below with the general comment categories for which they provided comments. Date stamped copies of the comment letters and postcards are provided with annotations showing the commenter number (RTC No.) and comment category code associated with a particular comment. Pink/magenta lines across some comment letters appear to be artifacts of the scanning process. Colored dots from an abandoned color-coding scheme remain on some letters.

Note 3:
In addition to the summarized comments and responses provided on the following pages, all responses to comments have been combined into a single file, and provided in tabular format.

Note 4:
Notices, announcements, and other documents related to the proposed MCL for 1,2,3-TCP were posted to the 1,2,3-Trichloropropane web page at

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/123TCP.shtml,

and on the Documents for Public Comment web page at

http://www.swrcb.ca.gov/public_notices/comments/index.shtml.

Notices and announcements were also e-mailed to subscribers to the "Board Meetings", "Regulations – General", and "Drinking Water Program Announcements" listserves, to which approximately 3,200; 6,500; and 3,600 non-waterboards.ca.gov accounts are subscribed, respectively.

Commenter Index

Commenter			Date Received	Comment Categories
Name [1]	Web No. [2]	RTC No. [3]		
American Civil Liberties Union of California	1	19	10-Apr-2017	B, P
Arvin Community Services District, City of Kingsburg, City of Parlier, City of Reedley, Belhi County Water District, Del Rey Community Services District, Le Grand Community Services District, Orosi Public Utility District, Vaughn Water Company, and Woodville Public Utility District	2	37	18-Apr-2017	A, B
Association of California Water Agencies and the California-Nevada Section of the American Water Works Association	3	33	21-Apr-2017	D, F, L, Q
Byers/Richardson Lawyers[4]	4	31	2-Mar-2017	A, B
California Manufacturers & Technology Association and the American Chemistry Council	5	10	20-Apr-2017	S
California Water Association	6	14	21-Apr-2017	B, D, G, H
California Rural Legal Assistance Foundation	7	2	18-Apr-2017	A, B, P
California Rural Legal Assistance, Inc.	8	24	30-Mar-2017	B, I, J, K, P
Central Valley Clean Water Association	9	8	21-Apr-2017	O
City of Chino, Chino Basin Desalter Authority, Monte Vista Water District	10	26	21-Apr-2017	B, D, E
City of Shafter	11	30	20-Apr-2017	N
Community Water Center and Clean Water Action	12	21	21-Apr-2017	I
Community Water Center, Clean Water Action, City of Arvin, Environmental Working Group, Greenfire Law, Sierra Club, Parents for a Safer Environment, The Environmental Justice Coalition for Water, Central California Environmental Justice Network, CalPIRG, Asociacion de Gente Unida por el Agua, Center for Race, Poverty, and the Environment, Pesticide Action	13	4	19-Apr-2017	A, B, P

[1] Alphabetical order by organization name (for multi-party letters, name of first signatory). Comments from individuals not representing other organizations are listed as General Public, in alphabetical order by first name.

[2] As listed on State Water Board public comments page (https://www.waterboards.ca.gov/public_notices/comments/trichloropropane/)

[3] Number represents commenter sequence in response to written comments prepared for 8 July 2017 Board meeting.

[4] This comment letter is a copy of the same form letter or of similar text that the SWRCB received from other individuals. See Appendix A for list of commenter names.

Commenter Index

Commenter			Date Received	Comment Categories
Name [1]	Web No. [2]	RTC No. [3]		
Network, Progressives United for Social Justice and Human Rights, El Quinto Sol de America, San Jerardo Cooperative, Inc., Food and Water Watch, Leadership Counsel for Justice and Accountability, Turtle Island Restoration Network, California Coastkeeper Alliance, Center for Environmental Health, Californians for Pesticide Reform, League of Women Voters of California, Central California Asthma Collaborative, Medical Advocates for Healthy Air, Friends of the Earth U.S., Californians for Alternatives to Toxics, Promotores Comunitarios del Desierto, Food Empowerment Project, Occidental Arts & Ecology Center, Lymphoma Foundation of America, Transition to Organics, Clean Water and Air Matter, Turning Green, California Latinas for Reproductive Justice, Alliance of Nurses for Healthy Environments, Beyond Toxics, Alaska Commnity Action on Toxics, Action Now, Klamath Forest Alliance, Environmental Protection Information Center, Courage Campaign, Wholly H2O, Dolores Huerta Foundation, Planting Justice, Center for Biological Diversity, GMO Free California, Safe Ag Safe Schools, Monterey Bay Central Labor Council, Physicians for Social Responsibility-Los Angeles, Environmental Action Committee of West Marin, and California Environmental Justice Alliance				
Del Rey Community Services District	14	5	21-Apr-2017	B, I
Duane Morris LLP on behalf of the City of Bakersfield	15	6	4-Apr-2017	D
Environmental Working Group, Clean Water Action, and Community Water Center (*2,228 supporters/ signatories*)	16	12	20-Apr-2017	A, B
General Public – Alexander Gouyet	17	1	19-Apr-2017	A, B
General Public – Armando Valdez[5]	18	3	19-Apr-2017	B
General Public – Daniel Del Grande	19	7	19-Apr-2017	A, B, C
General Public – Dieter Jundt	20	9	19-Apr-2017	A, B
General Public – Holly Welstein	21	13	7-Mar-2017	A, B
General Public – Jo Anne Welsch	22	15	19-Apr-2017	A, B

[5] This comment letter is a copy of the same form letter or of similar text that the SWRCB received from other individuals, including this one repeated as commenter 451. See Appendix B for list of commenter names.

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Commenter			Date Received	Comment Categories
Name [1]	Web No. [2]	RTC No. [3]		
General Public – John Fesenko	23	16	19-Apr-2017	B
General Public – Kaihli Vang	24	17	19-Apr-2017	B
General Public – Kathleen Hyland	25	18	19-Apr-2017	A, B
General Public – Lucy	26	23	19-Apr-2017	B
General Public – Mase Milham	27	25	19-Apr-2017	B
General Public – Melinda Roy	28	27	21-Apr-2017	A
General Public – Michael Biczynski	29	29	19-Apr-2017	A, B
General Public – Paula Cooper-Tipton	30	32	19-Apr-2017	A, B
General Public – Rita Minjares	31	34	22-Mar-2017	A, B
General Public – Ryan Anthony Hatch [6]	32	35	29-Mar-2017	B
General Public – Unknown	33	38	19-Apr-2017	B
General Public – Wendy Meunier	34	39	19-Apr-2017	B
General Public – Zarli	35	40	19-Apr-2017	B
Metropolitan Water District of Southern California	36	28	21-Apr-2017	B, D, M
Olivenhain Municipal Water District	37	20	20-Apr-2017	D, L, Q
Pasadena Water and Power	38	11	17-Apr-2017	A, B, E, F
Planned Parenthood Mar Monte [7]	39	22	18-Apr-2017	A, B, P
Rural Community Assistance Corporation and Self-Help Enterprises	40	36	19-Apr-2017	B, K, P
William Nyström	-- [8]	207	-- [9]	B
Lynne Olsen	-- [8]	276	14-Apr-2017	B
Muntean	-- [8]	293	-- [9]	B
Ralph Chappell	-- [8]	327	-- [9]	B
Roger Paskett	-- [8]	328	17-Apr-2017	B

[6] This comment postcard is a copy of the same form letter or of similar text that the SWRCB received from other individuals. See Appendix C for a list of commenter names.

[7] This comment letter is a copy of the same form letter or of similar text that the SWRCB received from other individuals. See Appendix D for a list of commenter names.

[8] No web number available for this form letter.

[9] Comment letter listed was not date-stamped, but was received by 5:00 p.m. on 21 April 2017.

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Commenter			Date Received	Comment Categories
Name [1]	Web No. [2]	RTC No. [3]		
Evasto Ferreira [10]	--[8]	332	--[9]	P, R
Brian Huse	--[8]	452	--[9]	B, P
Tom Meshishnek	--[8]	453	--[9]	A, B
Steven Lucas and Rose Barry	--[8]	454	--[9]	A, B, P
Spencer Smith	--[8]	455	--[9]	A, B, P
Daniel Scovill	--[8]	456	--[9]	A, B, P
Jesse Barlow	--[8]	457	--[9]	A, B, P
Deborah K. Mar	--[8]	458	--[9]	A, B, P
John Crowley and family	--[8]	459	--[9]	A, B, P
Linda Mitteness	--[8]	460	--[9]	A, B, P
Irene Kaufman	--[8]	461	--[9]	A, B, P
Judith Barker	--[8]	462	--[9]	A, B, P
David and Susan May	--[8]	463	--[9]	A, B, P
Ed McCormick	--[8]	464	--[9]	A, B
Linden Young	--[8]	465	--[9]	A, B, P

Comment Category Index

Comment Category	General Topic	Comment Letters[3]	Page
A	Cost Recovery	1, 2, 4, 7, 9, 11, 12, 13, 15, 18, 227, 27, 29, 31[4], 32, 34, 37, 453-465	6
B	Adopt MCL of 5 ppt	*all except* 6, 10, 13, 20, 21, 27, 30, 33, 332-334, 338-356, 373-446	7
C	Groundwater Remediation	7	7
D	Compliance Plans	6, 14, 20, 26, 28, 33	7
E	Blending	11, 26	9
F	Non-detect as Zero	11, 13, 33	9
G	CEQA	14	9
H	Best Available Technology	14	10

[10] This comment letter is a copy of the same form letter or of similar text that the SWRCB received other individuals (equivalent letters in English and in Spanish). See Appendix E for list of commenter names.

Comment Category Index

Comment Category	General Topic	Comment Letters[3]	Page
I	Grandfathering (of Data)	5, 21, 24	10
J	Underestimated Costs	24	11
K	Financial Assistance	24, 36	11
L	Operation and Implementation Concerns	20, 33	12
M	ELAP	28	12
N	Treatment Design	30	13
O	Impacts to POTWs	8	13
P	Disproportionate Effect	2, 4, 19, 22[7], 24, 36, 332[10]-334, 338-356, 373-446, 452, 454-463, 465	14
Q	Loss of Confidence	20, 33	14
R	Adopt MCL Near 0.7 ppt	332[10]-334, 338-356, 373-446	14
S	Cost-Benefit Analysis and Economic Feasibility	10	14

SUMMARY OF WRITTEN COMMENTS AND RESPONSES TO COMMENTS
Summarized comments are in plain text, with responses in *italicized text*.

A. Cost Recovery

1. State Water Board Should Recuperate Costs

a. Comment: The State Water Board should engage in some form of recuperation from entities that the commenters felt were responsible for the presence of 1,2,3-TCP in drinking water. These recuperative activities included:

- Allowing water systems to recoup water treatment costs
- Ordering water systems to recoup water treatment costs
- Directly recouping water treatment costs

Other commenters stated that the proposed regulations would allow for similar cost-recovery.

b. Response: *The State Water Board is aware that some public water systems have been able to successfully recover the cost of treatment from responsible parties. Although adoption of the proposed regulations may provide clarity and assist public water systems in their litigation or negotiations with responsible parties over reimbursement for treatment costs, that is not the intent of the State Water Board's actions in adopting the regulations. Any action the State Water Board could take to assist in recouping costs of treatment for public water systems would be taken outside of this regulatory process, and is, therefore, outside of the scope of these regulations.*

B. Adopt MCL of 5 ppt

1. State Water Board Should Adopt 1,2,3-TCP MCL of 5 ppt

a. Comment: Commenters stated that they were in support of the proposed MCL of 5 ppt, or that the State Water Board must adopt the proposed MCL of 5 ppt, or adopt an MCL at the DLR, or adopt an MCL as close as feasible to the PHG. Some commenters stated that the State Water Board should adopt the proposed MCL of 5 ppt "with all expediency", that the adoption should "not be delayed any further", or similar statements indicating a desire for immediacy.

b. Response: *The State Water Board thanks the commenters for their support and comments. The State Water Board agrees and has therefore made adoption of the 1,2,3-TCP MCL, at the DLR of 5 ppt, one of its highest priorities*.

C. Groundwater Remediation

1. Treatment Technologies for 1,2,3-TCP in Groundwater are Available

a. Comment: Commenter noted that treatment technologies for groundwater that are available for remediation of chlorinated hydrocarbons include pump and treat, permeable reactive barriers, in situ chemical oxidation, and bioremediation.

b. Response*: The proposed regulations are for drinking water served by public water systems. While groundwater remediation may result in improved source water, regulations pertaining to groundwater remediation are outside the scope of this regulation*.

D. Compliance Plans

1. State Water Board Should Allow Additional Time for Compliance

a. Comment: Several commenters requested that the State Water Board include in the regulations provisions to specifically allow additional time for public water systems to take action to comply with this new drinking water standard without being considered out of compliance with the standard. Commenters noted that the process of evaluating compliance options and planning compliance projects requires significant time and resources.

b. Response: *The State Water Board recognizes that for water systems unable to comply with a drinking water standard, a thorough evaluation of compliance options and implementation of a compliance project will often require time and resources. The State Water Board also recognizes the interest of public water systems to not be in violation of any drinking water standard. However, the State Water Board does not consider allowing a water system to be considered to be in compliance while serving water that does not meet the 1,2,3-TCP MCL to be adequately protective of public health*.

2. State Water Board Should Allow Schedules and Exemptions Similar to HSC 116425(a)

a. Comment: Commenter reminded the State Water Board that the Safe Drinking Water Act provides for exemptions under Health and Safety Code (HSC) 116425(a),

which set out a schedule for interim measures and compliance to be achieved up to three years of the exemption being issued.

b. Response: *The State Water Board agrees that existing statutes in Health and Safety Code (HSC) section 116425 allow for some public water systems to apply and receive an exemption from an MCL. Therefore, no new exemption process needs to be included or made more specific in regulation.*

3. State Water Board Should Allow Compliance Plans as in HSC 116431

a. Comment: Commenters referenced SB 385 (2015, Hueso) and the resulting statute in HSC 116431 and requested that the regulations be amended to provide additional time for compliance as was given for hexavalent chromium. HSC 116431 allows a PWS with a drinking water source containing hexavalent chromium above the 2014 MCL to submit a compliance plan to the State Water Board. Following approval from the State Water Board, a PWS would then begin to engage in a variety of activities including public notification and treatment installation. HSC 116431 also provides that a PWS shall not be deemed in violation of the hexavalent chromium MCL while implementing the compliance plan or waiting for State Water Board action on the compliance plan.

b. Response: *The State Water Board acknowledges that a compliance plan process was established under SB 385 to allow public water systems that are out of compliance with the hexavalent chromium MCL to apply for and receive a compliance plan. The California legislature, however, limited the scope of SB 385 to hexavalent chromium. At the time of MCL adoption, hexavalent chromium was considered both highly expensive and difficult to remove from drinking water. For 1,2,3-TCP, the identified Best Available Technology (BAT) of Granular Activated Carbon (GAC) does not have the same challenges as the treatment technology for hexavalent chromium. GAC is a readily available and reliable technology, and there are not similar cost and implementation issues with treatment of 1,2,3-TCP as there were with hexavalent chromium. GAC is neither a new nor a novel technology requiring extensive preliminary planning and design to implement. The State Water Board does not consider allowing a water system to remain in compliance while serving water that does not meet the proposed 1,2,3-TCP MCL to be adequately protective of public health.*

4. State Water Board Should Allow Alternative Compliance Mechanism

a. Comment: Some commenters requested that the State Water Board adopt or allow an alternative compliance mechanism to the existing regulations. More specifically, the requests are variations of allowing a PWS to enter a state of quasi-compliance where a source contaminated with 1,2,3-TCP above the MCL would not render the PWS out of compliance with the proposed MCL, thereby allowing a PWS to remain in compliance with the MCL while they are designing and installing treatment for removal of 1,2,3-TCP.

b. Response: *The State Water Board's Division of Drinking Water District offices may work with systems on system-specific plans, such as approving blending plans, to avoid violating the proposed MCL, but the State Water Board does not consider*

allowing a water system to remain in compliance while serving water that does not meet the proposed 1,2,3-TCP MCL to be adequately protective of public health.

E. Blending

1. State Water Board Should List Blending as BAT or Approved Treatment

a. Comment: Commenters noted that some water systems may pursue blending instead of GAC treatment and expressed a desire that Table 64447.4-A be expanded to include blending as a Best Available Technology (BAT) or as an approved treatment, and that the regulations should specify blending criteria. Other commenters also indicated that technology besides the BAT may exist for activities such as drinking water treatment or groundwater remediation.

b. Response: *On page 27 of the Initial Statement of Reasons, the State Water Board stated that other technologies capable of treating water to the proposed MCL may exist, and that the inclusion of a technology as a BAT does not preclude a public water system from receiving a permit allowing use of alternative treatment, including blending.*

Blending is already considered to be a treatment technique capable of reducing contaminant concentrations to compliance levels, and therefore does not require inclusion in the regulations. Blending is highly site-specific and reliant upon operating criteria and plans that are reviewed by the Division of Drinking Water District offices; additional regulations for blending would not be appropriate as part of the this regulatory package.

F. Non-detect as Zero

1. State Water Board Should Consider and/or Specify Treatment of Non-Detect Results

a. Comment: One commenter recommended that the regulations specify that analytical results that are less than the DLR of 5 ppt should be treated as the number zero when averaging is used for compliance with blending objectives. Another commenter urged the State Water Board to carefully consider the impact on compliance resulting from the interpretation of analytical results less than the DLR.

b. Response: *A value of zero is typically used for results that are less than the Detection Limit for the Purposes of Reporting (DLR) when calculating the running annual average of source water samples. Further definition of non-detect results is not necessary in the proposed regulations.*

G. California Environmental Quality Act (CEQA)

1. State Water Board Should Expand GAC Analysis Discussion in IS/MND

a. Comment: Commenter requested that the State Water Board expand the analysis of the Initial Study/Mitigated Negative Declaration to clarify that it fully analyzes the likely environmental effects of GAC implementation, consistent with Public

Resources Code section 21159, and provides specific suggestions on how to do so.

b. Response: *The Initial Study/Mitigated Negative Declaration (IS/MND) analyzes potential environmental impacts of implementing Granular Activated Carbon (GAC), and demonstrates that GAC would not have significant environmental impacts. Nonetheless, there is the potential for unique circumstances at specific water systems to necessitate additional analysis and mitigation to address site-specific concerns. The State Water Board, therefore, disagrees that there are changes that should be made to the document to ensure that it would be able to be relied upon by all water systems that may implement GAC, and that site-specific conditions may require that additional analyses be completed*.

H. Best Available Technology (BAT)

1. Summary Comment

a. Comment: Commenter stated, "Because water systems have a duty to implement BAT, GAC is the required, and therefore the reasonably foreseeable treatment technology/pollution control equipment that public water systems must implement in order to comply with the new drinking water standard."

b. Response*: Best Available Technology (BAT) designation does not mandate use of the BAT. Public water systems may propose alternative treatment options to the BAT when applying for a permit and, if found acceptable by the Division of Drinking Water District office, will be granted a permit to operate treatment other than Granular Activated Carbon (GAC) for the purposes of removing 1,2,3-TCP*.

I. Grandfathering of Data (Use of Data Collected Prior to Regulation Effective Date)

1. State Water Board Should Allow Grandfathering Data to Incentivize Early Monitoring

a. Comment: Commenters expressed support for the provisions that would allow the grandfathering of previously obtained data for compliance with newly developed MCLs (*i.e.*, allow the use of some data collected prior to the effective date of the regulation).

b. Response*: The State Water Board believes that allowing the use of some previously collected data for the initial sampling that must occur after a MCL is adopted (known as grandfathering) encourages public water systems to monitor their drinking water sources in advance of drinking water standard implementation; this early sampling helps public water systems with contaminated sources prepare for future compliance actions and begin planning well in advance of the effective date of the regulations*.

2. State Water Board Should Not Allow Grandfathering Data

a. Comment: Commenter opposed grandfathering of data for several reasons, including that contaminant concentrations in groundwater sources can vary unpredictably, historic data may not represent current conditions, and that substituted data may have lower values than current levels. The commenter

expressed concern that the consumers may not receive timely notification of a problem in some scenarios due to allowing grandfathering of previously collected data.

b. Response*: The State Water Board recognizes that the scenarios described are theoretically possible but also very unlikely, and the proposed regulations include a requirement to submit a request to the State Water Board for approval and condition that substitution may only occur with State Water Board approval. The State Water Board is not required to approve a request for substitution and during review may determine that substitution is not appropriate. Substitution of samples encourages public water systems to monitor their drinking water sources in advance of the establishment of a new drinking water standards. The information from early sampling helps prepare for future compliance actions and planning. Not allowing substitution of results may discourage some public water systems from performing early sampling, leading to increased delays in identifying and addressing of contamination.*

J. Underestimated Costs

1. State Water Board Overestimated Economies of Scale Effect for Certain Size Systems

a. Comment: Commenter stated that the State Water Board overestimates the effect of economies of scale on medium-sized water systems, leading to decreased accuracy of cost estimates for certain size water systems especially for medium sizes water systems with somewhat more than 200 service connections.

b. Response: *The State Water Board's economic estimates are generalizations across the state, and are not intended to be predictive of a particular public water system's cost. Additional categories of water systems would not necessarily make estimated costs more meaningfully accurate to a particular public water system.*

K. Financial Assistance

1. State Water Board Should Provide Financial Assistance to Disadvantaged Communities

a. Comment: Several commenters state that the State Water Board should provide financial assistance to disadvantaged communities impacted by contamination with 1,2,3-TCP. One commenter stated that should the State Water Board seek additional sources of funding for this purpose, the State Water Board should seek additional public input on methods to raise the necessary funds that do not create additional burdens on contaminated communities.

b. Response: *The State Water Board provides financial assistance targeted specifically at disadvantaged communities with violations of drinking water standards. Although how the State Water Board or the State of California raises funds for loans and grants is outside the scope of this regulation, the State Water Board appreciates the insight provided about the potential impacts of a tax on bottled water to support funding. The State Water Board also agrees that it is important that low-income communities not be further disadvantaged, and recognizes the challenges that are faced by these communities. The communities*

that are disproportionately affected by 1,2,3-TCP are sometimes also the most economically disadvantaged, too.

L. Operation and Implementation Concerns

1. Operational Costs Associated with GAC Treatment May Be Costly

a. Comment: Commenters noted that treatment costs could be impacted by operational practices, such as using GAC, and that the use of GAC may be costly.

b. Response: *The regulation does not mandate the use of GAC to treat for 1,2,3-TCP. The State Water Board's Division of Drinking Water District offices provide technical support to public water systems and funding opportunities are available from the Division of Financial Assistance through loans and grants.*

The State Water Board did consider general operational practices when developing the regulations and did include estimates of operations and maintenance costs as part of the economic feasibility discussion in the Initial Statement of Reasons. During development of a standard, the State Water Board cannot consider every unique and site-specific element to drinking water operations that a PWS may encounter as part of their compliance actions. These site-specific elements are evaluated as part of the permitting process. Public water systems should work closely with their Division of Drinking Water District Offices to develop system-specific operation plans that would address operational requirements.

2. State Water Board Should Consider Operational Factors During Implementation

a. Comment: Commenters noted that treatment would likely require use of GAC, and may necessitate the temporary shutdown of some water treatment plans until capital improvements can be made. Commenters recommended that during implementation, the State Water Board should fully consider operational factors such as incorporating non-detects, turn-around times between sampling and certification, obtaining laboratory results, ongoing treatment costs, and meeting blending objectives in determining compliance.

b. Response: *Criteria for blending and other operational concerns will be determined as part of the review performed by the Division of Drinking Water District offices when a permit application for treatment is submitted. Defining operational factors for various treatments in regulation may provide clarity but may also interfere with necessary operational flexibility when establishing operations plans that are adequately protective of public health.*

M. Environmental Laboratory Accreditation Program (ELAP)

1. State Water Board's ELAP Should Establish Standard Sample Collection Procedures

a. Comment: Commenter recommended that State Water Board's Environmental Laboratory Accreditation Program (ELAP) establish standard procedures regarding the collection and analysis of samples to ensure quality control to reduce the likelihood of false negatives and false positives.

b. Response: *This comment is not directly relevant to the proposed regulations, but the State Water Board, of whom ELAP is a part of, will work to help ensure that sample results are accurate when reported.*

N. Treatment Design

1. State Water Board Should Allow Operational Flexibility to Comply with MCL

a. Comment: Commenter stated that the State Water Board should allow public water systems to exercise operational flexibility to meet the proposed MCL through the most economically viable treatment systems possible.

b. Response: *The State Water Board did not specify design or operational criteria for the treatment of 1,2,3-TCP in the proposed regulations. Each treatment system will have particular design and operational criteria determined as part of the permitting process during implementation.*

O. Impacts to Publicly Owned Treatment Works (POTWs)

1. State Water Board Should Consider Water Code §13241 Factors and POTW Impacts

a. Comment: Commenter stated that the State Water Board should have considered and evaluated the economic impacts on POTWs that may have to treat for 1,2,3-TCP if detected in the effluent from the POTW, and should have considered the factors set out in Water Code section 13241 because once adopted, the MCL becomes a water quality objective and is incorporated by reference into the basin plan.

b. Response: *The State Water Board does not believe that there will be any impact on POTWs. First, the water that ends up in the POTWs from homes and businesses will be primarily free of 1,2,3-TCP. This is because the drinking water systems will be removing 1,2,3-TCP from groundwater before it enters homes and businesses, and is then used and sent to the treatment works. To the extent that any 1,2,3-TCP does end up in the system, it would likely be addressed by biological treatment and/or diluted to such an extent that it did not cause or contribute to a violation of a water quality objective for 1,2,3-TCP. The State Water Board disagrees that the State Water Board must consider the factors specified in Water Code section 13241 when adopting maximum contaminant levels. Nonetheless, to the extent that the factors in Water Code section 13241 are relevant, they were considered when developing the MCL. The commenter did not offer anything to substantiate its assertion that this regulation will have an impact on POTWs, and after reviewing the possibility, the State Water Board does not believe that this is a likely possibility and is too speculative of an impact to warrant further consideration.*

P. Disproportionate Effect of Contamination

1. There Will Be Disproportionate Impact on Small, Rural, Lower-Income Communities

a. Comment: Several commenters stated that there would be a relatively large, disproportionate impact on small public water systems serving rural, lower-income communities.

b. Response: *The State Water Board is aware that some communities may be disproportionally affected by 1,2,3-TCP. The State Water Board's Division of Drinking Water District offices provide technical support to public water systems and funding opportunities are available from the Division of Financial Assistance through loans and grants as well as through other infrastructure funding programs*.

Q. Loss of Confidence

1. Public Will Lose Confidence in Water Supplier if Deemed Out of Compliance

a. Comment: Commenter expressed concern that public confidence in the safety of their drinking water supply or supplier may be undermined if a water agency is deemed out of compliance.

b. Response: *The public may lose confidence in their water supply or supplier upon being informed of a violation of a water quality standard. However, the public's right to know of a violation of a drinking water standard is foundational to the Safe Drinking Water Act. Confidence will be restored after the water system adequately treats the water.*

R. Adopt MCL Near 0.7 ppt

1. State Water Board Should Adopt 1,2,3-TCP MCL as Close as Possible to Public Health Goal (PHG) of 0.7 ppt

a. Comment: Commenters urged the State Water Board to adopt an MCL for 1,2,3-TCP as close as possible to the current PHG of 0.7 ppt.

b. Response: *The establishment of an MCL for 1,2,3-TCP at a value less than the established Detection Level for Purposes of Reporting (DLR) of 5 ppt cannot be determined to be technologically feasible. In addition, it is not possible to make an accurate estimate of the economic impact or reduction in cancer exposure at values less than 5 ppt, given that the current analytical methods do not report levels below 5 ppt. Therefore an MCL at a value of 0.7 ppt was neither evaluated nor considered for adoption. Establishment of an MCL for 1,2,3-TCP at the DLR is as close to the PHG as technologically feasible.*

S. Cost-Benefit Analysis, Economic Feasibility (including accessibility of data used)

1. State Water Board Should Perform Cost-Benefit Analysis Similar to U.S. EPA's

a. Comment: The State Water Board did not perform a cost-benefit analysis using methodology similar to that used by the U.S. EPA. Commenter stated that the

economic feasibility analysis performed by the State Water Board was inadequate and that a cost-benefit analysis should have been conducted.

b. Response: *The State Water Board disagrees that a cost-benefit analysis is required in order to determine the economic feasibility of the proposed MCL. Economic feasibility is not defined in HSC section 116365 and the State Water Board disagrees that it requires a cost-benefit analysis. HSC section 116365 directs the State Water Board to "[determine] economic feasibility" by "[considering] the costs of compliance to public water systems, customers, and other affected parties with the proposed primary drinking water standard, including the cost per customer and aggregate cost of compliance, using best available technology." As documented in the regulation package, the State Water Board considered all of those elements when determining economic feasibility of the proposed regulations, but was not required to weigh the risks and the benefits. The commenter points to analysis performed by the U.S. EPA for its adoption of federal drinking water standards, and asserts that California's analysis should also include a similar cost-benefit analysis despite the different requirements in the federal and state law. The federal Safe Drinking Water Act, unlike its California counterpart, requires a cost-benefit analysis during the development of new drinking water regulations. (42 USC 300(g)-1(b)(3)(C).) The California statute, in comparison, only requires that the MCL be set as close to the PHG as is technologically and economically feasible. HSC section 116365 states that for the purposes of determining economic feasibility, the State Water Board must consider the costs of compliance but nowhere is there a requirement to analyze the cost in relation to the benefits. The State Water Board, when proposing a standard, does not consider at which point the value of a life is outweighed by the costs.*

2. State Water Board Must Separately Determine Technological Feasibility and Economic Feasibility

   a. Comment: The State Water Board is required to separately determine technological feasibility and economic feasibility.

   b. Response: *The State Water Board did separately determine technological feasibility and economic feasibility and did not subordinate economic feasibility to technological feasibility. The Initial Statement of Reasons shows that the proposed regulations are both technologically feasible and, separately, economically feasible*.

3. State Water Board Did Not Disclose Cost-Benefit Analysis to Peer Reviewers

   a. Comment: The key task of the peer reviewers was to review the scientific basis of the Board's determination of economic feasibility. However, the peer reviewers were severely handicapped because the Board did not disclose its cost-benefit analysis, and none of the reviewers was trained in economics.

   b. Response: The key task was to review the scientific basis of the proposed MCL, rather than the economic feasibility. The State Water Board did not perform a cost-benefit analysis in which the costs and benefits would have been specifically compared using comparable units (such as Cost in Dollars/Benefits in Dollars).

Our reference to a cost-benefit analysis in the peer review document was meant to refer to our analysis of costs and our analysis of benefits, not a calculation of the ratio of costs to benefits. The information provided to peer reviewers was sufficient for a review of the cost estimation method and approach. The State Water Board submitted the peer review documents to the "external peer review entity" as required by HSC 57004(d)(1). In the July 1, 2016 Request for External Review the State Water Board recommended that an "environmental economist with experience in analyzing costs and benefits" be solicited for the review process. The State Water Board complied with the process requirements of HSC 57004 and thus, per HSC 57004(b), has "complied with this [HSC 57004] if it complies with the peer review processes established pursuant to these statutes".

4. State Water Board Provided Inadequate Information for Public Review

   a. Comment: The documents disclosed by the State Water Board are inadequate for reproducing its work, making it impossible for the public to conduct a proper review and provide informed comments.

   b. Response: The State Water Board identified in the Initial Statement of Reasons and the Cost Estimating Methodology the steps and assumptions made in identifying approximately how many systems would have to comply with the requirements, the costs for monitoring, and the costs for ongoing treatment using granular activated carbon for those systems that would have to provide treatment. There is sufficient data and descriptions of State Water Board processes available to the public to be able to assess approximate costs for systems that will have to monitor and treat; those costs are used in assessing economic feasibility of the proposed MCL.

5. State Water Board Did Not Discount Costs and Benefits the Same Way

   a. Comment: The State Water Board uses a 7% discount rate for costs, but does not discount benefits.

   b. Response: The State Water Board did not use a discounting factor when determining costs. The 7% value used in the capital recovery method equation merely represents an assumed additional cost to public water systems in the form of interest paid on a loan used to build capital improvements.

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Byers/Richardson Lawyers	31	2-Mar-2017	A, B
Allyson Hance	41	--[9]	A, B
Pamela Suess	42	--[9]	A, B
Patrick M.K. Richardson	45	--[9]	A, B
Leila Khan	46	--[9]	A, B
E. Bloom	47	--[9]	A, B
Stacy Collins	48	--[9]	A, B
Shanna Haynes	49	--[9]	A, B
Tim Carlson	50	--[9]	A, B
Alison Bayley	51	--[9]	A, B
Illegible	52	--[9]	A, B
Kwok Siong/Siew Poh Tong	53	--[9]	A, B
Dave Girard	54	--[9]	A, B
Colleen Blake	55	--[9]	A, B
Daisy	56	--[9]	A, B
Hetal Jariwala	57	--[9]	A, B
Alex Little	58	--[9]	A, B
Sonia Zaldana	59	--[9]	A, B
Thomas Yip	60	--[9]	A, B
Tim Kieschnick	61	--[9]	A, B
Kelsey Langsdane	62	--[9]	A, B
Benedicte Richardson	63	--[9]	A, B
Alison	64	--[9]	A, B
Tiffany Bayly	65	--[9]	A, B
Gordon D. Cremer	66	--[9]	A, B
Michelle Ayoob	67	--[9]	A, B
Erik Dunlap	68	--[9]	A, B
Jane Austin	69	--[9]	A, B
Anna Coachman	70	--[9]	A, B
Chris Heine	71	--[9]	A, B

[11] Commenter names not sorted in any particular order.

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Raina Pinkosh	72	--[9]	A, B
Taylor Bennett	73	--[9]	A, B
Aimee Arrieta	74	--[9]	A, B
Natalie Purbrick	75	--[9]	A, B
Nancy Kalter-Dills	76	--[9]	A, B
Kyra Gordon & Illegible	77	--[9]	A, B
Jared Brick	78	--[9]	A, B
Becky Yip	79	--[9]	A, B
Deb Porter	80	--[9]	A, B
M. Megan Standish	81	--[9]	A, B
Russell Saxten	82	--[9]	A, B
Marc Staton	83	--[9]	A, B
Emilia Kaldis	84	--[9]	A, B
Carol Hakeil	85	--[9]	A, B
Anna Mariarella	86	--[9]	A, B
Elizabeth Allen	87	--[9]	A, B
Stephanie Rodriguez	88	--[9]	A, B
Carolyn P.	89	--[9]	A, B
Anthony Lin	90	--[9]	A, B
Cathy Pan	91	--[9]	A, B
Linda S. Cain	92	--[9]	A, B
Ben Platt	93	--[9]	A, B
G. Fujikara	94	--[9]	A, B
Katrina Turman	95	--[9]	A, B
Dr. Jeff Z.	96	--[9]	A, B
Sajida Kaliyadan	97	--[9]	A, B
Nathan Cheng	98	--[9]	A, B
Sarah A. Young	99	--[9]	A, B
Nathaniel Horton	100	--[9]	A, B
Greg Hamilton	101	--[9]	A, B
Steve Edmunds	102	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
J.A.	103	--[9]	A, B
Jennifer Kemper	104	--[9]	A, B
S. Uoning	105	--[9]	A, B
Michael R. Adamsa	106	--[9]	A, B
Kyle Janssan	107	--[9]	A, B
Cassandra Thompson	108	--[9]	A, B
Grant Walters	109	--[9]	A, B
Teresa Savin	110	--[9]	A, B
Mario Murguia	111	--[9]	A, B
Gabriel Bloom	112	--[9]	A, B
Edward E. Thompson	113	--[9]	A, B
Illegible	114	--[9]	A, B
Stuart Kendall, illegible	115	--[9]	A, B
Wendy Fiering	116	--[9]	A, B
Kim Yip	117	--[9]	A, B
Aman Parikh	118	--[9]	A, B
Illegible	119	--[9]	A, B
Krista Farey, Vishwanath Lingappa, Anuradha Lingappa	120	--[9]	A, B
Illegible	121	--[9]	A, B
Judith	122	--[9]	A, B
Molly Brown	123	--[9]	A, B
Catherine	124	--[9]	A, B
Aimee Haire	125	--[9]	A, B
Marcy Kaufman	126	--[9]	A, B
Tate Dobbins	127	--[9]	A, B
Mai Otake	128	--[9]	A, B
Katherine Cheng	129	--[9]	A, B
Katie Brohawn	130	--[9]	A, B
Lauren Nakusato	131	--[9]	A, B
Laurel R. Weeks	132	--[9]	A, B
Erin Fieberling	133	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Scott W.	134	--[9]	A, B
Illegible	135	--[9]	A, B
Haven Fiering	136	--[9]	A, B
Julie Sonksen	137	--[9]	A, B
Illegible	138	--[9]	A, B
Jean Y.	139	--[9]	A, B
Stephen L.	140	--[9]	A, B
Chris Knipp	141	--[9]	A, B
Stephanie Patfield	142	--[9]	A, B
J. Limbach, D.K. Meadows	143	--[9]	A, B
Teri Gruenwald	144	--[9]	A, B
Sean Thompson	145	--[9]	A, B
Leah Duffy	146	--[9]	A, B
Illegible	147	--[9]	A, B
Andrea Dawson	148	--[9]	A, B
Jenifer A.	149	--[9]	A, B
Renee G.	150	--[9]	A, B
Ernesto	151	--[9]	A, B
Desmond Murray	152	--[9]	A, B
Chole Cooper	153	--[9]	A, B
Illegible	154	--[9]	A, B
Clifton Pollard	155	--[9]	A, B
Yvonnw Milhan	156	--[9]	A, B
M.M.	157	--[9]	A, B
Thorsten Claus	158	--[9]	A, B
Steve Edlen	159	--[9]	A, B
Jim and Mary Smith	160	--[9]	A, B
Janice Wenning	161	--[9]	A, B
Lynette Ubois	162	--[9]	A, B
Julie McNamara	163	--[9]	A, B
Sharon Yost	164	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Iris Hawks	165	--[9]	A, B
Susan Merriman	166	--[9]	A, B
Devon Merriman	167	--[9]	A, B
Diane Smader	168	--[9]	A, B
Cay Canello	169	--[9]	A, B
Albert Pellizzari	170	--[9]	A, B
Mick Pellizzari	171	--[9]	A, B
Donna Pellizzari	172	--[9]	A, B
John Johnson	173	--[9]	A, B
Philippe Acheritogaray	174	--[9]	A, B
Pema and Kathryn Cunningham	175	--[9]	A, B
Susan Johnson	176	--[9]	A, B
Jeff Wolfold	177	--[9]	A, B
Meredith Martin	178	--[9]	A, B
Natasha Funck	179	--[9]	A, B
Illegible	180	--[9]	A, B
Clive A. Henrick	181	--[9]	A, B
Patty W.	182	--[9]	A, B
Carlin Otto	183	--[9]	A, B
Illegible	184	--[9]	A, B
Roberta Stauffacher	185	--[9]	A, B
Gloria Eppler	186	--[9]	A, B
K. Bennett	187	--[9]	A, B
M. Winby	188	--[9]	A, B
A. Wright	189	--[9]	A, B
J. Hughes	190	--[9]	A, B
Joan S. Stauffer	191	--[9]	A, B
Natasha N.	192	--[9]	A, B
M.Cui Sinton	193	--[9]	A, B
Kimberly Hawks	194	--[9]	A, B
Lila Hawks	195	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Charles Bultman	196	--[9]	A, B
Esmeralda Marquez	197	--[9]	A, B
Elliot R. Frost	198	--[9]	A, B
Mary McCanta	199	--[9]	A, B
Norma Pachard	200	--[9]	A, B
Liam Bogfelt	201	--[9]	A, B
Katherine Murphy	202	--[9]	A, B
G. D'buyo	203	--[9]	A, B
Ulla Foeln	204	--[9]	A, B
Mark Wieder	205	--[9]	A, B
Michaline LePaule	206	--[9]	A, B
Stuart G. Campbell	208	--[9]	A, B
J. Sekow	209	--[9]	A, B
Emily Cook	210	--[9]	A, B
Jasif Jan Tomas	211	--[9]	A, B
Ashley Chu	212	--[9]	A, B
Robert F.	213	--[9]	A, B
Jessie Octtinger	214	--[9]	A, B
William C. Moore	215	--[9]	A, B
Tony Phillips	216	--[9]	A, B
Amber Lin	217	--[9]	A, B
Illegible	218	--[9]	A, B
Scott Hamilton	219	--[9]	A, B
Monti Pullizzari	220	--[9]	A, B
Patrick Lin	221	--[9]	A, B
David J. Evans	222	--[9]	A, B
Luann Alci	223	--[9]	A, B
Mia Carlson Alci	224	--[9]	A, B
Sarah Custer	225	--[9]	A, B
Richard Leeds	226	--[9]	A, B
Rick Kleine	227	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Emily Jones	228	--[9]	A, B
Saul	229	--[9]	A, B
Kara Cox	230	--[9]	A, B
Illegible	231	--[9]	A, B
Steve Worley	232	--[9]	A, B
Mark Fillmore	233	--[9]	A, B
Jesse Griffin	234	--[9]	A, B
Pat Flores	235	--[9]	A, B
Illegible	236	--[9]	A, B
Noel E. Olson	237	--[9]	A, B
Sean Mooney	238	--[9]	A, B
Joyce Chu	239	--[9]	A, B
Ted Barmus	240	--[9]	A, B
Dick Liu	241	--[9]	A, B
Illegible	242	--[9]	A, B
Rosie Bultman	243	--[9]	A, B
Margaret Hubbert	244	--[9]	A, B
Paige K. Parsons	245	--[9]	A, B
Steven Williams Sinton	246	--[9]	A, B
Sheldon (Last name Illegible)	247	--[9]	A, B
William E. Benitz	248	--[9]	A, B
Michele Lanza and Sebastian Desio	249	--[9]	A, B
Miriam Baskin	250	--[9]	A, B
Elizabeth V. Dickinson	251	--[9]	A, B
Illegible	252	--[9]	A, B
Katie Ferrell	253	--[9]	A, B
Illegible	254	--[9]	A, B
Cooper J. Smith	255	--[9]	A, B
Steven J. Smith	256	--[9]	A, B
Illegible	257	--[9]	A, B
Forrest Brown	258	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Hilary Powell-Wright, Kevin Wright, & Norah Wright	259	--[9]	A, B
Bryce K.	260	--[9]	A, B
Kristie Glatze	261	--[9]	A, B
No Signature	262	--[9]	A, B
Ian Jones	263	--[9]	A, B
Illegible	264	--[9]	A, B
Keith A. Jantzen	265	--[9]	A, B
C. Lopez	266	--[9]	A, B
Charles Neifeld	267	--[9]	A, B
Michael Mckelligan	268	--[9]	A, B
Eliza Ramierez	269	--[9]	A, B
Colleen Shiplee	270	--[9]	A, B
Gerald B.	271	--[9]	A, B
Marty Skeels	272	--[9]	A, B
Doryanna Moreno	273	--[9]	A, B
Paul Johnson	274	--[9]	A, B
Mary B.	275	--[9]	A, B
*Duplicate of Comment # 275	277	--[9]	A, B
Brian Dodd	278	--[9]	A, B
Gianni Pellizzari	279	--[9]	A, B
M.T. Tarden	280	--[9]	A, B
Rich F.	281	--[9]	A, B
Stacey Kimball	282	--[9]	A, B
Ainne Marxer	283	--[9]	A, B
Johanna Heine	284	--[9]	A, B
Oshani Gunakkara	285	--[9]	A, B
Jesse Greywolf	286	--[9]	A, B
Vanem Corrce	287	--[9]	A, B
Sara Mrsny	288	--[9]	A, B
Illegible	289	--[9]	A, B
Eric Fieberling	290	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Grace K.	291	--[9]	A, B
Mera Hayes	292	--[9]	A, B
Haley Kleine	294	--[9]	A, B
Michael Clark	295	--[9]	A, B
Joe Lahiff and Lana Radosavljevic	296	--[9]	A, B
Barbara Broucht	297	--[9]	A, B
Lara Asmundson	298	--[9]	A, B
Cary Milia	299	--[9]	A, B
Clifford Stewart	300	--[9]	A, B
Carly Keller	301	--[9]	A, B
Illegible	302	--[9]	A, B
Jeanne Ross	303	--[9]	A, B
Elizabeth Rhodes	304	--[9]	A, B
Maria S.	305	--[9]	A, B
Arianne Schneider-Stocking	306	--[9]	A, B
Thomas Stocking	307	--[9]	A, B
Julie Ansara	308	--[9]	A, B
Ellie Campbell	309	--[9]	A, B
Evangeline and Ted Leash	310	--[9]	A, B
Christian Kearney	311	--[9]	A, B
Alexandra Pasfield	312	--[9]	A, B
Ethan Kaplan	313	--[9]	A, B
Clifford Hunt	314	--[9]	A, B
Leslie K. Hunt	315	--[9]	A, B
K. and K. Bradfield	316	--[9]	A, B
Bryan Wilde	317	--[9]	A, B
Lindsey Stratton	318	--[9]	A, B
Patty Brink	319	--[9]	A, B
Madeline King	320	--[9]	A, B
Steve Crumley	321	--[9]	A, B
Shawn Jones	322	--[9]	A, B

Appendix A

Commenters Exemplified by Comment Letter Web No. 4 and RTC No. 31		Date Received	Comment Categories
Name [11]	RTC No. [3]		
Roger Lion	323	--[9]	A, B
Marlene Philley	324	--[9]	A, B
Lawrence M. Carson	325	--[9]	A, B
*Duplicate of Comment # 325	326	--[9]	A, B
Loren Hajeda and Dana Caulder	329	--[9]	A, B

Appendix B

Commenters Exemplified by Comment Letter Web No. 18 and RTC No. 3 (letters received in both English and Spanish)		Date Received	Comment Categories
Name [11]	RTC No. 3		
Armando Valdez	3/451	--[9]	B
Irma Badillo	330	--[9]	B
Carole Laval	331	--[9]	B
Jeni-Ann Kren	335	--[9]	B
Kaihli Vang	336	--[9]	B
Matilde Hererra	337	--[9]	B
Azallea Bajo	357	--[9]	B
Carlos Arias	358	--[9]	B
Thomas J. Hernandez	359	--[9]	B
Raymond F. Ensher	360	--[9]	B
Bob & Joyce Jones	361	--[9]	B
Esperanza	362	--[9]	B
Barbara Ryle	363	--[9]	B
James L Rodgers	364	--[9]	B
William Barret	365	--[9]	B
Sarah Taylor	366	--[9]	B
Charles Barrett	367	--[9]	B
Robert S.	368	--[9]	B
Janet Miller	369	--[9]	B
Marsha Conant	370	--[9]	B

Appendix B

Commenters Exemplified by Comment Letter Web No. 18 and RTC No. 3 (letters received in both English and Spanish)		Date Received	Comment Categories
Name[11]	RTC No. 3		
Billie MacDougall	371	--[9]	B
Patricia Brown	372	--[9]	B
J. Sauado	399	--[9]	B
Daniel Serrano	447	--[9]	B
Raymond Ensher	448	--[9]	B
John Leal	449	--[9]	B
Willie Lopez	450	--[9]	B

Appendix C

Commenters Exemplified by Comment Letter Web No. 32 and RTC No. 35		Date Received	Comment Categories
Name[11]	RTC No. [3]		
Ryan Anthony Hatch	35	29-Mar-2017	B
Martin Battle (x2)	--	13-Mar-2017	B
D. Semerick	--	13-Mar-2017	B
Jennifer Denbou	--	13-Mar-2017	B
Jennifer Lewis	--	13-Mar-2017	B
A watchful water drinker	--	20-Mar-2017	B
Amelia Degenkolb	--	20-Mar-2017	B
Lynne Olsen	276	--[9]	B
Muntean	293	--[9]	B

Appendix D

Commenters Exemplified by Comment Letter Web No. 39 and RTC No. 22		Date Received	Comment Categories
Name[11]	RTC No. [3]		
Liz Figueroa	22	18-Apr-2017	A, B, P
Ceorl	43	9-Mar-2017	A, B, P
Sojin Oh	44	13-Apr-2017	A, B, P

Appendix E

Commenters Exemplified by RTC No. 332 (letters received in both English and Spanish)		Date Received	Comment Categories
Name[11]	RTC No.[3]		
Evasto Ferreira	332	--[9]	P, R
Roberto A…ica	333	--[9]	P, R
Maria Pantosa	334	--[9]	P, R
Roberto Reyes	338	--[9]	P, R
M… Orinda	339	--[9]	P, R
Alicia Sandoval	340	--[9]	P, R
Rosalinda Rivera	341	--[9]	P, R
Laura Yazmin Trujillo	342	--[9]	P, R
Jesus Sandoval	343	--[9]	P, R
Ana L. Alvarez	344	--[9]	P, R
Lucy Hernandez	345	--[9]	P, R
Stephanie Hernandez	346	--[9]	P, R
Sergio Avalos	347	--[9]	P, R
J. H.	348	--[9]	P, R
S. Q.	349	--[9]	P, R
Carlos Rodriguez	350	--[9]	P, R
Jessica Rodriguez	351	--[9]	P, R
Karla Rodriguez	352	--[9]	P, R
Rosario Rodriguez	353	--[9]	P, R
Cristina S. Rodriguez	354	--[9]	P, R
Matthew Sandoval	355	--[9]	P, R
Illegible	356	--[9]	P, R
Javier S.	373	--[9]	P, R
S. B.	374	--[9]	P, R
Mariana Rodriguez	375	--[9]	P, R
Saul Velasquez	376	--[9]	P, R
Roberto Garcia	377	--[9]	P, R
Fidd Perez	378	--[9]	P, R
Estela Escoto	379	--[9]	P, R

Appendix E

Commenters Exemplified by RTC No. 332 (letters received in both English and Spanish)		Date Received	Comment Categories
Name[11]	RTC No.[3]		
J. Rosario Moreno R.	380	--[9]	P, R
Yesenia Martinez	381	--[9]	P, R
Beronica Flores	382	--[9]	P, R
Eleazor Gonzalez	383	--[9]	P, R
Blanca Flores	384	--[9]	P, R
Maria G. Olea	385	--[9]	P, R
Bertolo Chavez	386	--[9]	P, R
Francisco Perez O.	387	--[9]	P, R
Rosa Morales	388	--[9]	P, R
Nicolas Ayala	389	--[9]	P, R
Maria C. Martinez	390	--[9]	P, R
Juan Juarez	391	--[9]	P, R
Anadelia Duran	392	--[9]	P, R
Manuel Alberto Rico E.	393	--[9]	P, R
Armando V.	394	--[9]	P, R
E. Calderon	395	--[9]	P, R
Laura Zauala	396	--[9]	P, R
Yolanda Rosales	397	--[9]	P, R
Edwin S. Ramirez	398	--[9]	P, R
J. Sauado	399	--[9]	P, R
Eduardo L. Colmenares	400	--[9]	P, R
Rita Vargas	401	--[9]	P, R
Illegible	402	--[9]	P, R
R. Arrcaza	403	--[9]	P, R
Rosa Moreno	404	--[9]	P, R
Adriana Cisneros	405	--[9]	P, R
Luis Sanchez	406	--[9]	P, R
Illegible	407	--[9]	P, R
Evasto Ferreira A.	408	--[9]	P, R
Juan Muniz	409	--[9]	P, R
Elena S.	410	--[9]	P, R

Appendix E

Commenters Exemplified by RTC No. 332 (letters received in both English and Spanish)		Date Received	Comment Categories
Name[11]	RTC No.[3]		
Juan C.	411	--[9]	P, R
Illegible	412	--[9]	P, R
Gustavo Aguirre	413	--[9]	P, R
E…th E.	414	--[9]	P, R
I…	415	--[9]	P, R
Devrasaif	416	--[9]	P, R
D…	417	--[9]	P, R
B. Na…	418	--[9]	P, R
Illegible	419	--[9]	P, R
Debbie M.	420	--[9]	P, R
Illegible	421	--[9]	P, R
B. Raul Buza…	422	--[9]	P, R
Paula Cardenas	423	--[9]	P, R
Elizabeth Martinez	424	--[9]	P, R
Maisabel Ramirez	425	--[9]	P, R
Rita Vargas	426	--[9]	P, R
Flor Reyes	427	--[9]	P, R
Carina Porra	428	--[9]	P, R
Luis Gustavo	429	--[9]	P, R
Yazin Trejo	430	--[9]	P, R
Juan Cardenos	431	--[9]	P, R
David Gonzalez O…	432	--[9]	P, R
Teresa Chavolla	433	--[9]	P, R
Mariela Rosas	434	--[9]	P, R
Marco Garcia	435	--[9]	P, R
Rafael Moreno	436	--[9]	P, R
Bertha Lopez	437	--[9]	P, R
Omar Barraza	438	--[9]	P, R
Maria Agu…	439	--[9]	P, R
Isaul Reyes	440	--[9]	P, R
Robert C. G…y	441	--[9]	P, R
Karina Vazquez	442	--[9]	P, R

Appendix E

Commenters Exemplified by RTC No. 332 (letters received in both English and Spanish)		Date Received	Comment Categories
Name[11]	RTC No.[3]		
Sandra Garcia	443	--[9]	P, R
D.	444	--[9]	P, R
Haydee Trujillo	445	--[9]	P, R
B.	446	--[9]	P, R