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September 16, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



**Re: Association of California Water Agencies' and California Municipal Utilities Association's Comments regarding the State Water Resources Control Board Environmental Laboratory Accreditation Program Preliminary Staff Recommendation for Laboratory Standard**

Dear Ms. Townsend:

The Association of California Water Agencies ("ACWA") and the California Municipal Utilities Association ("CMUA") appreciate this opportunity to provide comments on the State Water Resources Control Board ("SWRCB") Environmental Laboratory Accreditation Program ("ELAP," or "Program") Regulations Development and Preliminary Staff Recommendation for Laboratory Standard ("Preliminary Staff Recommendation") noticed on September 6, 2016. ACWA represents over 430 public water agencies that collectively supply approximately 90% of the water delivered for domestic, agricultural and industrial uses in California. CMUA represents 40 water agency members that deliver water to over 70% of Californians. Many of ACWA's and CMUA's public agency members are entrusted with the responsibility of supplying the public with safe and reliable drinking water. Ensuring the safety of drinking water supplies by complying with all relevant state and federal standards is the highest priority of these agencies.

High-quality drinking water laboratory results are vitally important to the protection of public health and the environment. Accordingly, ACWA and CMUA believe that it is essential that ELAP be able to ensure that laboratories are providing public health officials and other data users with high quality results to enable informed decision-making. A number of our member agencies operate in-house laboratories and have committed substantial time, energy and resources over a number of years in an effort to improve the State's laboratory accreditation program and practices, including through participation on the Environmental Laboratory Technical Advisory Committee ("ELTAC"). We appreciate the time and effort that SWRCB Board Members and staff have invested to date to help ensure that the Program is able to adequately discharge its intended functions.

Recognizing the central importance of an effective and workable laboratory accreditation standard to ELAP's mission, ACWA and CMUA are concerned that the Preliminary Staff Recommendation to develop regulations based on the 2016 NELAC Institute ("TNI") Standard, Volume 1 is problematic. The costs and complexity associated with implementation of the full TNI Standard would create a significant burden for small laboratories and potentially jeopardize the ongoing viability of many smaller labs around the state. While ELAP has indicated that the Program will consider "revisions to portions of the standard that may be problematic for implementation in California," ensuring that any new accreditation standard is workable will require the SWRCB to engage representatives from laboratories of all sizes to meaningfully analyze and account for the potential consequences of implementation of the TNI standard.

As ELAP moves forward with the development of a new accreditation standard, we encourage the SWRCB to develop a timeline for adoption of final regulations that acknowledges and accounts for the need for additional stakeholder input and participation. ACWA and CMUA also respectfully request that the SWRCB extend the September 16, 2016 deadline for submission of written comments on the Preliminary Staff Recommendation until October 6, 2016, the date of the SWRCB workshop on this issue. Extending the deadline for written comments will allow stakeholders additional time to provide the SWRCB with informed and constructive comments.

ACWA and CMUA appreciate the ongoing efforts of the SWRCB to improve the effectiveness of ELAP. We believe that with continued leadership and effort on the part of SWRCB management and staff, ELAP will be able to fulfill the Program's vital mandate through the adoption of a laboratory accreditation standard that works for labs of all sizes.

If you have any questions regarding these comments, please contact Adam Robin, ACWA Senior Regulatory Advocate at AdamR@ACWA.com or (916) 441-4545 or Danielle Blacet, CMUA Director for Water at DBlacet@CMUA.org or (916) 326-5802.

Sincerely,



Adam Walukiewicz Robin  
Senior Regulatory Advocate



Danielle Blacet  
Director for Water

cc: Ms. Christine Sotelo, Chief, Environmental Laboratory Accreditation Program,  
Division of Drinking Water, SWRCB