



## San Diego County Water Authority

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December 12, 2014

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### OTHER REPRESENTATIVE

County of San Diego

VIA EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814**

**RE: Comments Regarding Safe Drinking Water Plan for California**

**Dear Ms. Townsend:**

**The Water Authority is a wholesale agency serving 24 member retail agencies. The Water Authority and its member agencies serve a population of 3.1 million and a local economy of \$188 billion. Our mission is to provide a safe and reliable supply of water to our member agencies serving the San Diego region. We appreciate the opportunity to comment on the proposed Safe Drinking Water Plan for California (Plan). With the Division of Drinking Water moving into the State Water Resources Control Board, we see the opportunity to encourage improved management of water supplies and water quality from source water to the customer and we hope that the State Board will encourage greater collaboration to protect water quality in support of reliable and high quality drinking water supplies. Below are our specific comments on various issues that are addressed in the plan.**

### **Threat to Water Supply and Source Water Protection**

**The Plan addresses algae and algal toxins in water, as well as challenges related to the formation of disinfection byproducts. Both challenges are caused by high nutrient concentrations and natural organic matter in the raw water supplies. The Plan suggests that water suppliers would need to take steps to address the problems through reducing contaminants in the surface water sources and/or changing the method of treatment. Many water quality and treatment challenges are created or exacerbated by upstream discharges into surface water supplies and often result in requirements placed on water suppliers to manage the pollution through installation of costly treatment processes. Currently the Regional Boards place their highest priorities and resources on implementing total**

maximum daily loads (TMDLs) to the detriment of adequately addressing water quality issues impacting drinking water supplies. With the merger of the Division of Drinking Water into the State Board, we ask that a higher priority be placed by the State and Regional Boards on source water protection, including reduction of nutrients into surface water sources. To implement this, the Plan should include the following recommendation: The State Board's Division of Water Quality and the Regional Boards will coordinate with the Division of Drinking Water to develop priorities for drinking water source water protection. Those priorities will be incorporated into State and Regional Board policies and plans."

#### Methods for Screening Microbial Agents

The Plan states that use of coliform bacteria as an indicator of contamination in drinking water supplies is not adequate because it is not fail-safe. This implies that the current microbial standards are not adequate and should be set at a zero risk level. Drinking water standards are established based on a reasonable risk level, not a zero risk level. The Plan should note that public health protection from pathogens under the Safe Drinking Water Act does not rely solely on microbial monitoring, but also relies sanitary protection of groundwater sources, the establishment of multi-barrier treatment for surface water supplies, maintaining a chlorine residual in the distribution system, and through sanitary operating practices such as water main disinfection to prevent contamination.

We agree that the polymerase chain reaction (PCR) technology can provide valuable monitoring tools for managing water supplies, but more from a watershed and source protection perspective, not to determine compliance with drinking water standards. This type of testing can be used to determine the source and risk of contamination and better manage discharges on the watershed to protect source water quality. Recommendation 6-1 should be modified to say. "The State Water Board will track research and methods for testing microbes using emerging technology. Attention should be paid to use of the testing for source water protection and management of water supplies."

#### Supply Reliability and Small Water System Challenges

The Plan recommends that applicable public water systems submit studies regarding their existing sources of drinking water and take necessary actions to avoid or mitigate the impact of the loss of supply on the public health and safety, including the loss of supply due to extended drought conditions. It does not however indicate how this recommendation would be applied. The Urban Water Management Planning Act Section 10635 currently requires agencies, serving greater than 3000 customers or delivering greater than 3000 acre-ft per year, to complete an assessment of the reliability of its water service to its customers during normal, dry, and multiple dry water years. Furthermore, it requires an assessment of

the sources of supply for the system. We believe that additional studies are not needed because this assessment is already included as part of the Urban Water Management Plan. If the intent is to require studies of public water systems that have demonstrated inadequate source capacity or are not required to prepare an Urban Water Management Plan, the Plan should indicate the triggers which would make the requirement to complete a special study applicable to a public water system.

The proposed Plan includes several recommendations to address small water system issues, including legislation requiring connection of small systems to large water systems, coordination with other agencies such as LAFCO and local planning departments and development of funding approaches which could include a water use tax. We agree that the small water system and disadvantaged community challenges are a high priority. However, we do not support a water use tax or a blanket mandate for large water systems to connect small water systems. Large water systems are most likely to annex and connect smaller water systems or neighboring customers when it is cost effective for both to do so and when funding is provided for needed improvements, so that the costs of consolidation will not be placed on the existing customer base.

#### Emergency Preparedness and Response

The Plan proposes that emergency response and incident command be incorporated as a part of the Urban Water Management Plan. As a water supplier with a progressive and active emergency response program, the Urban Water Management Plan seems to be an inappropriate venue for addressing emergency response implementation and training. The Urban Water Management Plan identifies emergency response plans and actions the agency is taking, but it is not an implementation plan for emergency response. We do agree that the State Water Board should encourage all public water systems to develop and maintain a robust multi-hazard emergency response plan, mutual aid agreements, and ensure that personnel are trained to respond in accordance with existing SEMS/ICS regulations. Currently, in order to be eligible for state funding of response-related personnel costs, local government is required to use the SEMS standardized response system. The State Board should continue to work with CALWARN, the Environmental Protection Agency and/or professional organizations such as the American Waterworks Association or the California Rural Water Association to ensure that emergency response/security training is made available on an ongoing basis throughout the state and encourage water agencies to train personnel.

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
December 12, 2014  
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If you have any questions, regarding these comments, please contact Toby Roy at (858) 522-6743.

Sincerely

A handwritten signature in black ink, appearing to read 'Ken Weinberg', with several long, sweeping horizontal strokes extending to the right.

Ken Weinberg  
Director of Water Resources