

File: 0551.1121

Dear Comment Clerk,



Subject: Coachella Valley Water District Comments on the Draft California Safe Drinking Water Plan

Coachella Valley Water District provides drinking water to three public water systems serving a population of about 300,000 that includes a large number of part-time residents. The following comments include verbal statements provided to State Water Resources Control Board staff during the December 2, 2014 workshop held in Coachella, California:

Coachella Valley Water District has consolidated many small water systems over the last 40 years to improve water service and continues to seek funding needed to provide high quality tap water to more of these water systems in the eastern Coachella Valley. The State's plan rightly supports these consolidations. However, the State's proposed mandate to broadly require annexation of small systems will not solve the legal, technical and financial barriers that often exist. Instead of mandating unwarranted annexations, the State's plan should promote cost effective alternatives for water systems to achieve compliance including point-of-use (POU) and point-of-entry (POE) treatment.

Rather than treating the entire water supply, these systems are designed to selectively treat that portion of delivered water used for drinking and cooking, often using a filter placed under the kitchen sink. POU/POE systems effectively remove contaminants most often found above State standards. Congress approved legislation allowing POU/POE systems in 1996 after EPA determined the cost savings from this selective treatment can enable water systems to provide more protection to consumers than they would otherwise be able to afford. While EPA and other states allow POU/POE systems, California only accepts temporary use of this option for the smallest public water systems. Even Riverside County (local agency) has successfully implemented POU/POE programs to achieve long-term compliance for state small water systems within their jurisdiction. The State's plan should establish a POU/POE program with practical provisions that can be used by water systems to achieve long-term compliance with regulations.

The State's plan also fails to recognize just how many systems are out of compliance due to new regulations. Of the more than 7,600 public water systems statewide, 191 failed to meet the new drinking water arsenic limit in 2012 after it was lowered by 80 percent. Arsenic is unlikely to hold the top spot for long. On July 1, California enacted the first ever drinking water regulation for chromium-6 and failed to provide water agencies time needed to install treatment facilities to comply. Chromium-6, like arsenic, is not an immediate health risk and is being regulated to reduce potential risks from long-term consumption. It occurs naturally in groundwater throughout California and hundreds of water systems are expected to fall out of compliance as a result of this unusual approach to implementing a new regulation.

The move to enforce new standards before treatment facilities can be installed, like California's position on using POU/POE, is inconsistent with the Federal Safe Drinking Water Act which requires EPA provide water systems 3 years to meet new drinking water regulations and allows 5 years when treatment facilities are needed. Forcing water systems out of compliance unnecessarily increases the costs passed on to consumers to meet new standards. The State's plan needs to recommend fixing this inconsistency by ensuring all new California drinking water regulations provide water systems affordable solutions and a reasonable path to maintain compliance.

Finally, the State's recommendation to have a water usage tax is not an equitable approach to help small water systems that are unable to comply with California drinking water standards. This approach would act to reward communities that have not practiced smart growth and would unfairly burden low income households in urban areas with the costs to provide drinking water improvements to service others. The better approach is to allow small public water systems to use cost effective alternatives like POU/POE programs to achieve long-term compliance in an affordable manner.

Your consideration of these comments is appreciated.

Sincerely,

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