

Sent via ELECTRONIC MAIL to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

December 15, 2014

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

**Re: Comments regarding the Draft Safe Drinking Water Plan for California**

Dear Ms. Townsend:

The Association of California Water Agencies, the California Municipal Utilities Association, the California-Nevada Section of the American Water Works Association and the California Water Association appreciate the opportunity to comment on the State Water Resources Control Board's ("State Board") draft Safe Drinking Water Plan for California ("Draft Plan"). As representatives of the entities that provide safe drinking water to the vast majority of Californians, we acknowledge the Draft Plan as a valuable reference and resource for the drinking water community and agree with many of its recommendations. However, we do have significant concerns with two of the specific recommendations included in the Draft Plan. We recommend that these provisions be removed from the Draft Plan and the Chapter 10

“Implementation Plan.” Our organizations’ comment letters, submitted under separate cover, include recommendations and suggested language to replace these provisions.

First, we oppose Draft Plan Recommendation 8-5’s recommendation for the enactment of legislation to “mandate a requirement that a small public water system that is within the sphere of influence of a larger water system should be required to annex to the larger system.” This proposed annexation mandate does not address the legal, financial and technical barriers to consolidation that currently exist. The proposed annexation mandate would also apply to well-managed and sustainable small systems, creating potential financial and organizational burdens that would not result in any practical benefit. The State Board should instead focus on the development of a strategy to remove the barriers to consolidation.

Second, we oppose Draft Plan Recommendation 4-3’s “water usage fee” tax proposal. Under Proposition 26, the enactment of such a tax would require a two-thirds vote of the Legislature. This water usage tax would also be regressive, and as the State Board’s February 2013 report to the Legislature “Recommendations Addressing Nitrates in Groundwater” noted, “a water use fee may be viewed as a burden on low-income residents.” We recognize the value of the development of stable funding sources to help fund safe drinking water solutions in small disadvantaged communities and encourage the State Board to engage stakeholders in discussions to identify viable, stable, long-term funding sources.

Our organizations appreciate the substantial efforts of State Board staff to produce the Draft Plan and organize stakeholder workshops that allowed drinking water community stakeholders with an opportunity to provide input into its continued development. Our organizations are committed to working with the State Board and other stakeholders to address drinking water quality and reliability issues, and we look forward to working with State Board staff as they continue to refine the Draft Plan.

Sincerely,



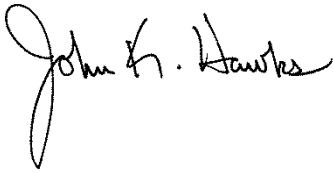
Timothy H. Quinn  
Executive Director, Association of California Water Agencies



Danielle Blacet  
Director for Water, California Municipal Utilities Association



Timothy Worley, PhD  
Executive Director, California-Nevada Section, American Water Works Association



John K. Hawks  
Executive Director, California Water Association

cc: The Honorable Felicia Marcus, Chair, State Water Resources Control Board  
The Honorable Dorene D'Adamo, Member, State Water Resources Control Board  
The Honorable Tam M. Doduc, Member, State Water Resources Control Board  
The Honorable Frances Spivy-Weber, Member, State Water Resources Control Board  
The Honorable Steven Moore, Member, State Water Resources Control Board  
Mr. Tom Howard, Executive Director, State Water Resources Control Board  
Ms. Cindy Forbes, Deputy Director, State Water Resources Control Board  
Ms. Karen Larsen, Assistant Deputy Director, State Water Resources Control Board