

March 30, 2012

Sent via Electronic Mail

Ms. Janice Zinky
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**COMMENTS ON SWRCB'S DRAFT REPORT, "COMMUNITIES THAT RELY ON
CONTAMINATED GROUNDWATER", RELEASED ON FEBRUARY 29, 2012**

Dear Ms. Zinky:

The Water Replenishment District of Southern California (WRD) appreciates this opportunity to submit comments on the draft report, "Communities That Rely on Contaminated Groundwater", released for public comment on February 29, 2012, by the State Water Resources Control Board (SWRCB). WRD manages the groundwater supply for nearly four million residents in 43 cities of Southern Los Angeles County. Our groundwater replenishment activities include supplementing local groundwater supplies with imported and recycled water in the Central Basin and West Coast Basin via the Montebello Forebay Spreading Grounds (also receives stormwater) and the injection projects at the West Coast, Dominguez Gap and Alamos Gap Seawater Barriers.

As a groundwater management agency, WRD maintains a proactive monitoring program to track the quality and the levels of the groundwater in our region and applauds efforts in support of protecting our critical groundwater resources. As such, we would like to take this opportunity to commend the SWRCB staff for their diligent effort in assessing and identifying communities and drinking water wells in California affected by groundwater contamination and for doing their best in trying to overcome the various challenges that accompany working with existing databases and large volumes of data not created specifically for the purpose of this report.

Based on our review, we have the following comments and concerns regarding the draft report, which we hope will be addressed in the final report.



Comments

1. One of the three objectives that the draft report is required to address is to identify communities in California that rely on contaminated groundwater as a *primary source* of drinking water. We feel that the report does not adequately address this objective, as it included under this category all communities that rely on “contaminated groundwater” (as defined in the report) for any portion of their drinking water. This categorization is misleading because the apparent intent of this objective is to identify affected communities where the majority of their drinking water supplies (by volume) come from contaminated groundwater. We recommend that the discussions pertaining to this category be revised using the information from Appendix 8, which identifies groundwater-reliant communities that utilize more than 50 % groundwater for their drinking water, albeit for a small number of communities, the information on their relative groundwater contribution is unavailable. Otherwise, we request that the word “primary” be removed because, as presently defined, its use in the report inflates the number of communities that rely on contaminated groundwater as a *primary source* of drinking water and thus compromises the accuracy of the report.

2. Figures 4.2 and 4.3 graphically illustrate the information from Table 4.1. However, there appears to be some inaccuracies in the county names in Figures 4.2 and 4.3. For instance,

County Names in Figures 4.2 and 4.3	Should be Changed to (per Table 4.1)
San Bernardino	San Benito
Riverside	Plumas
San Joaquin	San Diego
Sacramento	Riverside
San Diego	San Bernardino

3. To a large degree, the report manages to deliver its findings with the necessary sensitivity, without overemphasizing the specific regions with adverse ground water quality and focusing instead on the statewide picture of groundwater used for drinking water and its quality, with the following exception. The information conveyed in Figure 1 (“Top 15 Counties with the Greatest Number of Communities that Rely on Contaminated Groundwater as their Primary Source of Drinking Water”) would be more meaningful and balanced if immediately followed by Figure 4.2 (found in Appendix 4 and titled, “Top 15 Counties and Number of Communities that Rely on Contaminated Groundwater and have received an MCL Violation

- Groundwater Reliance (2002-2010)”. Based on the three objectives specified for this report, a key focus should be to assess communities unable to provide safe drinking water at least part of the time due to contaminated groundwater and thus require additional resources and assistance to mitigate the situation. In that regard, Figure 1 alone illustrates an incomplete picture in that many of the counties listed actually did adequately treat their groundwater prior to distribution, as shown in Figure 4.2.
4. In addition to the actual numbers, it would be informative to have the relevant statistics discussed as a percentage of the total universe of affected communities, wells, or population. For instance:
 - About 23% of the groundwater-reliant communities (or less than 20% of all active groundwater wells used for drinking water supply) in California had Maximum Contaminant Level (MCL) exceedances on two or more occasions for a chemical in their raw or untreated groundwater.
 - About 10% of the groundwater-reliant communities (serving about 7% of the groundwater-reliant population) had received an MCL violation from the California Department of Public Health.
 5. The discussion on funding sources to clean up or treat groundwater should include the underground storage tanks cleanup funds created by the California Legislature under the Barry Keene Underground Storage Tank (UST) Cleanup Fund Act of 1989 and is administered by the California State Water Resources Control Board. Though the Fund is not intended for general groundwater contamination mitigation activities, it does assist with groundwater contamination prevention and mitigation by providing a means for petroleum UST owners and operators to be reimbursed for unexpected and catastrophic expenses associated with the cleanup of leaking petroleum USTs. In addition, the Fund also provides money to the Regional Water Quality Control Boards and local regulatory agencies to abate emergency situations or to cleanup abandoned sites that pose a threat to human health, safety, and the environment, as a result of a petroleum release from a UST.

Also, the report should consider and mention funding available from local sources such as WRD whose Safe Drinking Water Program promotes the cleanup of local groundwater resources at specific contaminated well locations through financial assistance in the form of grants and loans to basin pumpers for their well head treatment.

Ms. Janice Zinky
SWRCB

March 30, 2012

We thank you in advance for your careful consideration of these comments. Should you have any questions concerning this letter, please feel free to contact Dr. Cathy Chang at (562) 275-4245.

Very truly yours,



Robb Whitaker, P.E.
General Manager

cc: via email only
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