



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

June 2, 2014

Mr. John Faust, Chief,
Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Dear Faust:

CalEnviroScreen 2.0 Draft Comments

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the draft Communities Environmental Health Screening Tool: CalEnviroScreen Version 2.0 (CES 2.0). Metropolitan, through its 26 member agencies, provides nearly half of the water used in Southern California. The decision to include a drinking water indicator in the current draft version has stimulated considerable discussion by the water community. We greatly appreciated the willingness of Cal EPA and OEHHA staff to provide a special briefing to local water agencies at a workshop conducted on May 15, 2014. During this workshop, organized by the Association of California Water Agencies (ACWA) and hosted by Metropolitan, details of the development of the draft CES 2.0 were provided and discussed with workshop participants. A number of significant issues were raised during this workshop which aided in the development of comments by ACWA and Metropolitan.

ACWA is submitting comments on CES 2.0 reflecting the collective experiences of drinking water professionals from water systems around the State. In their letter, ACWA provides a detailed outline of significant policy and technical concerns related to the draft CES 2.0, and particularly with the development and inclusion of the new Drinking Water Quality Indicator. ACWA also will provide comments on the CES 2.0 Technical Memorandum related to the Drinking Water Quality Indicator. ACWA has reiterated its strong belief that the draft Indicator does not reflect the critical fact that the vast majority of California water systems provide consumers with safe and healthy drinking water. Since most of the state's drinking water meets all standards established by the federal Safe Drinking Water Act and the California Health & Safety Code, the release of the draft CES 2.0 sent incorrect and inconsistent messages to regulators, water systems and the public they serve.

ACWA has also expressed concerns that the public agencies and other water systems responsible for providing safe drinking water to the public were not consulted in the development of the draft Indicator. Metropolitan shares these concerns and supports ACWA's comments. Involving ACWA and the water community in the initial stages of development of the drinking water quality Indicator would have likely resulted in a more accurate and understandable product, eliminating the need for many water agencies and OEHHA to do "damage control" after its release.

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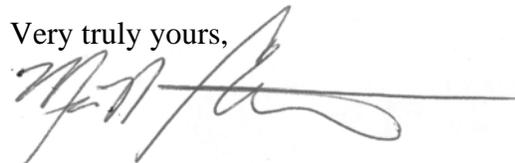
In addition to the comments expressed by ACWA, Metropolitan has specific concerns regarding the drinking water indicator contained in CES 2.0. The water quality data currently being utilized in the tool simply cannot be “downloaded” from the State’s database without proper examination of the raw numbers. For example, Metropolitan collects trihalomethane (THM) data from its treatment plants and throughout its extensive distribution system. Our member and retail agencies report these data to the State’s Drinking Water Program as required by regulation. The current CES 2.0 version uses THMs as one of its carcinogenic constituents; however, these data are specific to the time and location in which samples are collected and unless there are allowances in the CES 2.0’s methodology to account for these variables, the calculation might yield inaccurate results. Further, CES 2.0 uses a draft Public Health Goal (PHG) for assessing THM risk. We believe it is inappropriate to use a draft PHG for this purpose.

Metropolitan also requests additional clarification of the use of PHGs in the calculation of index values. ACWA’s comment letter clearly illustrates the limitations of the use of PHGs. Drinking water standards--while based on applicable PHGs--are expressed as maximum contaminant levels (MCLs). Without adequate explanation of the rationale and limitations of PHGs in the CES calculations, the public may erroneously conclude that their water is not safe to drink even though it may meet all drinking water standards. This would result in loss of public confidence in drinking water and potential installation of unnecessary and costly home treatment systems.

Metropolitan believes it is critical that the California Department of Public Health (effective July 1, 2014 State Water Resource Control Board, Division of Drinking Water) have a role in interpreting monitoring data used in CES 2.0. While this recommendation may complicate how the drinking water indicator generates numerical values for the tool, the risk of generating inaccurate or misleading results is an unintended consequence of their absence. Based on recent media coverage of the drinking water indicator, it is clear that this indicator will be closely examined and not solely used as part of the larger health screening indicator.

In summary, Metropolitan supports the efforts of Cal EPA and OEHHA in the protection of public health. We believe that if CES 2.0 is to be valuable in providing an indicator of exposure from drinking water, it must utilize data that is accurate, reliable and transparent to those using it. We thank you for your efforts in protecting public health and if you have any questions or need additional information, please contact me at (213) 217-5696 or mstewart@mw dh2o.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mic Stewart', with a long horizontal flourish extending to the right.

Mic Stewart, Ph. D.
Manager, Water Quality

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cc: Gina Solomon, M.D., M.P.H.
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