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January 11, 2010

Michael Baes
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
1515 Clay Street, 16th Floor
Oakland, Ca 94612

**RE: DRAFT PUBLIC HEALTH GOAL (PHG) FOR HEXAVALENT CHROMIUM
IN DRINKING WATER**

Dear Mr. Baes:

Thank you for this opportunity to provide comments on the draft Public Health Goal document. Desert Water Agency is a water service provider, and State Water Contractor, serving a 325-square-mile area including parts of Cathedral City, outlying county areas, Desert Hot Springs, and Palm Springs.

Desert Water Agency has taken a great interest in the public health goal proposed in the document released last year. Naturally occurring hexavalent chromium exists in groundwater found in the Mojave and Sonoran deserts of California, including groundwater found in the Coachella Valley. There are not now, nor have there ever been, industrial processes in our service area that would lead to hexavalent chromium in the groundwater supply.

Desert Water Agency believes the results of the National Toxicology Program Study and other referenced studies do not sufficiently demonstrate that human carcinogenicity is caused by ingesting hexavalent chromium in drinking water. This Agency supports the comments submitted by the Association of California Agencies (ACWA) on the draft Public Health Goal document, and we share with ACWA the concerns raised in these comments.

Specifically, Desert Water Agency awaits epidemiology study results that demonstrate the affect of hexavalent chromium in humans, as the difference in indigestion processes, stomach composition, and levels of gastric juices between rodents and humans were not taken into account in the referenced study. We are also hopeful that such a study will be based upon realistic concentrations of water with hexavalent chromium present.



Desert Water Agency believes that sound science is critical for the development of Public Health Goals. Evidence exists that there are flaws in the current report. Additional research should be conducted prior to establishing a Public Health Goal for hexavalent chromium in drinking water.

Public health is of the utmost importance to Desert Water Agency, and be assured the Agency's top priority is providing a reliable water supply. We look forward to additional information on this subject and appreciate your consideration of these comments.

Sincerely,

DESERT WATER AGENCY

A handwritten signature in black ink, appearing to read "David K. Luker".

David K. Luker
General Manager-Chief Engineer

DKL/jjt

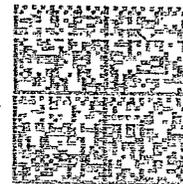
cc: Senator Barbara Boxer
Senator Dianne Feinstein
Lisa Jackson, Administrator, US EPA

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