



**City of Glendale, California**  
**Glendale Water & Power**  
Administration

**141 N. Glendale Ave., Level 4**  
**Glendale, CA 91206-4975**  
Tel 818.548.2107 Fax 818.552.2852  
[www.glendaleca.gov](http://www.glendaleca.gov)

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October 24, 2019

Ms. Carolina Balazs  
Office of Environmental Health Hazard Assessment  
1515 Clay Street, 16th Floor  
Oakland, CA 94612  
Submitted via email: [hr2w@oehha.ca.gov](mailto:hr2w@oehha.ca.gov)

Re: Comments on the Public Review Draft Mapping Tool and Draft Report, Achieving the Human Right to Water in California: An Assessment of the State's Community Water Systems

Dear Ms. Balazs,

Thank you for the opportunity to comment on the Draft Mapping Tool and Draft Report, Achieving the Human Right to Water in California. Please accept this letter as an electronic submission of Glendale Water & Power's (GWP) comments on the mapping tool and draft report.

Having the resources of the State, and OEHHA, to prepare and present a sophisticated web tool for water quality information is a benefit to water agencies who don't have the resources to create this sort of tool on their own. A tool like this can improve communication related to the difficult and complicated topic of water quality. One item that is routinely difficult to convey is the legitimate concern about contaminants in groundwater versus the safety of water after it has been treated.

There are many groundwater sources that will need to have treatment systems installed to keep them viable and the data about "potential high exposure" and "duration of potential exposure" is based on sampling from wells. This data can be misleading to customers because it doesn't represent the water quality of systems where there are already treatment systems, or blending plans, in place. An important step in building consumer confidence in the OEHHA mapping tool will be to report data based on the compliance point for water quality, which would be either after treatment if a treatment system is in place from the compliance point for blending if a blending plan in place or from the well if there is no treatment. This could even include updating the graphic on Page 10 of the draft report to include a branch that shows a treatment plant on the groundwater source, if applicable.

The best source of all the information are the Consumer Confidence Reports (CCRs) because this is the federally mandated annual water quality report that shows the quality of the water the customers are receiving. Understandably, the issue is that this report is not in an online database, which is what is being used for the OEHHA web page. A possible fix would be to ensure there is a field in the database to indicate if a sampling result is "before treatment" or "before blending". The databases use the "source water" which is a bit misleading because a well is called a "source" when it is directly pumped into the distribution system. A well is also called a "source" when it is pumped through a treatment system or when it is blended prior to distribution.

Water affordability is something that water managers throughout the State are concerned about. There are several tools, within the framework of the State Constitution that can be used to make water affordable to water system customers. One of these tools is the use of a tiered rate structure or a budget based rate structure. Typically, in both rate structures,



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water that is primarily for indoor use has a more affordable cost. During the webinar on October 3rd, 2019 there was a useful Q&A session. A question was asked about the “rates” used to perform the “affordability” calculations. The answer was that the numbers were taken from the Division of Drinking Water Annual Report. This was a good discussion because the guidance documents from DDW do not clarify to the extent needed on how to “fit” a wide variety of rates and rate structures into the online form, nor do they mention that this information will be used in the manner shown on the OEHHA tool. The DDW report guidance speaks to “average” and “most common” but the OEHHA tool discusses affordability, which are two different subjects. If the DDW information is going to be used for “affordability” calculations, that will affect how the information should be entered. Understandably, the OEHHA tool is using “available” data to calculate an affordability score. The SWRCB annual report requests detailed information on rate structures and an average monthly bill, not the cost for a customer that uses a specific amount of water in a month. The six hundred cubic feet (HCF) per month is a good choice for a volume of water to represent indoor use since one number needs to be picked for a statewide comparison. One way to improve the affordability calculation would be to request that the water systems submit what a customer would pay for 6 HCF’s in a month, since an average bill is not typically a bill for 6 HCF’s. The complexity of the calculation would actually be simplified because there would be one table with one variable to use in the calculation.

Thank you for the opportunity to comment and please feel free to contact me by phone at (818) 548-2107 or e-mail me at [mdeghetto@glendaleca.gov](mailto:mdeghetto@glendaleca.gov) if you need any additional information or clarification on these comments.

Sincerely,  
Michael De Ghetto, P.E.  
Chief Assistant General Manager – Water  
Glendale Water & Power