



CITY OF
**PALO
ALTO**

UTILITIES DEPARTMENT

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November 8, 2019

Submitted via Online [OEHHA](#)

Attn: Carolina Balazs, Ph.D.
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, CA 94612

Subject: Comment Letter – A Framework and Tool for Evaluating California’s Progress in Achieving the Human Right to Water

Dear. Dr. Balazs,

On behalf of the City of Palo Alto, thank you for this opportunity to comment on the draft Framework and Tool for Evaluating California’s Progress in Achieving the Human Right to Water. Palo Alto is committed to providing excellent water quality.

The CalEPA/OEHHA Draft Human Right to Water Data Tool (OEHHA Water Data Tool) cites a potential high exposure for the City of Palo Alto and further states “[t]his system had Maximum of 2-3 years of potential high exposure.” Additionally, the OEHHA Water Data Tool states that the City of Palo Alto water system had one contaminant with at least 1 MCL violation in the study period from 2008 - 2016. However, it is not clear from the information available on the OEHHA Water Data Tool which contaminant had an MCL violation or what the source is for the data presented.

The data may have come from the Safe Drinking Water Information System database that shows two coliform MCL violations, one in 2010 and one in 2012 both that were resolved promptly (i.e., within days). It is not correct that Palo Alto had a maximum of 2-3 years of potential high exposure.

The City of Palo Alto respectfully requests the OEHHA Water Data Tool be modified as follows:

- a) Clearly present the source for the water quality data presented
- b) For water quality violations shown to identify which contaminant is at issue
- c) Correct the statement that the City of Palo Alto had a maximum of 2-3 years of potential high exposure.

Palo Alto believes these changes will improve the information of most importance to members of the public viewing the OEHHA Water Data Tool.

Sincerely,

DocuSigned by:


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Dean Batchelor
Director City of Palo Alto Utilities

