



6075 Kimball Avenue • Chino, CA 91708
P.O. Box 9020 • Chino Hills, CA 91709
TEL (909) 993-1600 • FAX (909) 993-1985
www.ieua.org

November 7, 2019

Submitted via email: hr2w@oehha.ca.gov

Dr. Carolina Balazs
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, CA 94612

RE – Letter of Support for ACWA/CMUA Comment Letter on the OEHHA Human Right to Water Public Review Draft Mapping Tool and Draft Report

Dear Dr. Balazs:

The Inland Empire Utilities Agency (IEUA) appreciates the opportunity to provide public comment on the Office of Environmental Health Hazard Assessment (OEHHA) Public Review Draft Report entitled, *Achieving the Human Right to Water in California: An Assessment of the State's Community Water Systems* (Draft Report) and related Draft Mapping Tool (Draft Tool). We also appreciate the opportunity to attend the public workshop hosted in Ontario on the evening of October 28, 2019 to learn more about the Draft Report and Draft Tool and provide some initial comments and questions.

We have worked closely with the Association of California Water Agencies (ACWA) and California Municipal Utilities Association (CMUA) and would like to provide strong support for their detailed comment letter. In particular, we are concerned that the Draft Report and Draft Tool have not been sufficiently vetted by water agencies and other systems responsible for providing safe drinking water to the public. We echo ACWA and CMUA's call on OEHHA to, at a minimum, consider further engagement with the water community:

- Host a water community meeting to review and discuss initial comments received prior to OEHHA finalizing the report and tool;
- Provide water systems with the raw data from the tool when requested;
- Develop and institute a process that allows water systems the ability to appeal data shown in the tool and contextualize it with more relevant accurate information; and

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- Form an advisory group comprised of diverse water agencies, academia, community advocates and other interested stakeholders to serve in collaboration with OEHHA and provide an ongoing opportunity to discuss current indicators, future indicators, and versions of the tool.

IEUA's retail water agencies are especially concerned about the Draft Tool presenting conflicting and even contradictory information to water consumers regarding the safety of their drinking water. They feel that it would be better to instead direct water consumers to their local retail water provider's Consumer Confidence Report (Annual Water Quality Report) for accurate, science-based information about their drinking water quality.

We look forward to sharing with you our input, data and examples before finalizing the Draft Report and Draft Tool. Please contact me at sdeshmukh@ieua.org or (909) 993-1730 if you have any questions.

Sincerely,

INLAND EMPIRE UTILITIES AGENCY



Shivaji Deshmukh, P.E.

General Manager

SD/cp/shl

cc: IEUA Board of Directors
IEUA Member Agencies