

January 22, 2013

Dr. George Alexeeff  
Director, Office of Environmental Health Hazard Assessment  
1001 I Street  
Sacramento, CA 95814

**Subject: OEHHA's Proposed Revision to the Public Health Goal for Perchlorate.**

**Sent Electronically to Michael Baes ([michael.baes@oehha.ca.gov](mailto:michael.baes@oehha.ca.gov))**

Dear Dr. Alexeeff:

We write to express our concerns with the decision by the Office of Environmental Health Hazard Assessment's (OEHHA) to persist with its January, 2011 proposal to lower the Public Health Goal (PHG) for perchlorate in drinking water from the current 6 parts per billion (ppb) to 1 ppb.

We support the view of the Southern California Water Committee (SCWC) that "there is no new scientific or public health justification for California to lower its health protective standard of 6 parts per billion (ppb)" for perchlorate. Comments on OEHHA's December, 2012 revised draft PHG submitted by the SCWC detail the levels of protection already built into the current 6 ppb PHG. We believe that the weight of the evidence does not justify OEHHA's latest proposal, especially in light of the fact that OEHHA is seeking to provide an additional measure of protection against iodine uptake inhibition (IUI). OEHHA persists with this proposal despite the fact that IUI is recognized by the National Research Council and every other authoritative scientific body as a routine, reversible and non-adverse biological event, several steps removed from harmful health effects.

We believe that the proposed action sets the stage for new statewide water supply impediments. Since the Department of Public Health previously set the drinking water standard for perchlorate at the same level as the PHG, we are concerned that a lower perchlorate PHG would compel a reset of the drinking water standard, further constraining already limited groundwater resources throughout the state.

California is rapidly moving into uncharted territory in terms of water supply predictability. Our state faces increasing uncertainty about climate impacts on precipitation patterns and water storage for dry season use. Recent court decisions dedicate greater volumes of surface water supplies to species and habitat protection and the demands of a growing population are rapidly outpacing our aging water supply infrastructure. We cannot afford to sacrifice additional drinking water sources to well-meaning but unnecessary drinking water standards. OEHHA should not continue with a process that imposes additional costs on water users where, as in this case, it cannot demonstrate a meaningful public health benefit.

As California's Legislature moved away from financing storage projects such as dams and reservoirs and as imported supplies from major sources such as the State Water Project and the Colorado River became less predictable, local water agencies began developing a more diversified and sophisticated portfolio of supplemental supplies to ensure water reliability. From water transfers to local groundwater supplies to off-stream storage to reclamation, conservation and conjunctive use, local water agencies have become the frontline planner and developer of new water supplies.

All of these sources of supplemental water are absolutely essential in order to meet the requirements of Senate Bills 610 and 221 (requiring a tighter connection between water supply and land use planning) and to ensure that the water needs of a growing and prospering California are met in the years ahead. By extension, the resources available to develop and protect water sources must be allocated and invested in a manner that maximizes water supplies. This approach is consistent with the Governor's position that new water infrastructure projects "must be cost effective and make long term sense." Yet, the drinking water policy promoted by OEHHA's revised draft perchlorate PHG effectively guarantees that fewer resources will be available to address both imminent threats and long term water system needs.

The continued erosion of California's water supply to competing demands is also a significant impediment to the recovery of the state's residential construction industry which has historically ranked at the top among the state's leading industries in terms of economic output. We cannot expect to see housing construction fully recover in the absence of viable water supplies.

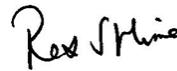
In an era of limited state and local resources we believe it would be better to address the needs of communities where the only available source of potable water is contaminated with arsenic or nitrate. Focusing resources to protect against legitimate threats to public health within these at-risk communities rather than chasing detection limits in a futile attempt to avoid exposure to naturally-occurring and human-induced contaminants would, in our opinion, be a much more worthy alternative.

In light of the above, we strongly urge OEHHA to suspend its January, 2011 proposal to lower the Public Health Goal (PHG) for perchlorate in drinking water from the current 6 parts per billion (ppb) to 1 ppb

Respectfully,



Richard Lyon  
California Building Industry Association



Rex Hime  
California Business Properties Association



Paul Meyer  
American Council of Engineering Companies, California



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CC: Cliff Rechtschaffen – Governor’s Office  
Matthew Rodriguez – Secretary, Cal-EPA  
Gordon Burns – Undersecretary, Cal-EPA  
John Laird – Secretary, Natural Resources Agency  
Diana Dooley – Secretary, Health and Human Services Agency  
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