



## Association of California Water Agencies

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Sent via email to [jzinky@waterboards.ca.gov](mailto:jzinky@waterboards.ca.gov)

March 29, 2012

Janice Zinky  
Division of Water Quality  
State Water Resources Control Board  
1001 I Street, 16th Floor  
Sacramento, CA 95814  
(916) 341-5897

Re: ***Communities That Rely on Contaminated Groundwater*** Draft Report

Dear Ms. Zinky:

Thank you for the opportunity to comment on the State Water Resources Control Board's (SWRCB) draft report on communities that rely on contaminated groundwater.

ACWA represents nearly 440 public water agencies in California that collectively supply 90% of the water delivered in California for domestic, agricultural and industrial uses. ACWA and its member agencies' highest priority is to protect public health while ensuring a reliable water supply for consumers.

ACWA recognizes groundwater's role in California's water supply and the challenges faced by communities that rely on contaminated groundwater as a primary source of drinking water. In 2011, ACWA published *Sustainability from the Ground Up: A Framework for Groundwater Management in California*, which provides an overview of current groundwater conditions, challenges to sustainable groundwater management, case studies in effective local management, and offers 22 recommendations for consideration and action. Among the challenges outlined in the Framework are groundwater quality degradation and its effects not only on local communities but in reducing opportunities for conjunctive use and artificial recharge projects.

Upon completion of the Framework, ACWA's Groundwater Committee developed an implementation plan (called the Action Plan) that focuses on specific recommendations for 2012-2013. The plan includes a robust section on actions the Association and its member agencies will take to address water quality issues with a focus on small and disadvantaged communities. One element of this section is the recognition of the need for additional groundwater quality information in communities with private wells or very small water systems, which is also considered a "significant data gap" in the draft report on page 18.

The Framework Action Plan states in part:

*As part of the groundwater data availability action item, [ACWA will] review the quality and quantity of existing monitoring data available for the affected disadvantaged communities. Identify areas where additional information should be gathered in order to make informed decisions about*

*prioritizing infrastructure investments and treatment options for the water supplies in those communities.*

We also make a specific recommendation in the Framework document urging the state to provide technical assistance to small and disadvantaged communities that will allow them to identify the best approach for protecting public health. We support the comments in the draft report on page 18 that describe the assistance these communities may need to successfully apply for funding and we will continue to work with the California Department of Public Health on ways to accomplish this objective, including more effective distribution of Drinking Water State Revolving Fund (DWSRF) grants and loans. ACWA also plans to work with State Water Board, local advocacy groups and other stakeholders to ensure guidance is provided in a timely manner.

ACWA is also supportive of the language in the draft report that states “*point-of-use/point-of-entry (POU/POE), are typically the most cost effective method of addressing groundwater contamination for small systems and private well owners*” (p. 14). While our members believe consolidation can be an effective option if all parties are agreeable and it is technologically and economically feasible, POU/POE treatment can be implemented quickly and may offer the best opportunity for reliable and safe drinking water supplies. It is important to note, however, that homeowners within the affected areas must commit to maintaining the treatment devices to ensure water quality, particularly if this treatment is to be used on a consistent and long-term basis.

In our efforts to implement successful long-term solutions, many of our member agencies are involved in collaborative, regional integrated planning efforts to address local water resource issues, including projects and activities to address contaminated groundwater. Our members work proactively to develop and implement innovative ways to remediate contaminated groundwater basins throughout the state. Reducing or removing contaminants from groundwater is often a lengthy and costly process but agencies are diligent in their efforts to clean up their local water supplies. We feel the State and Regional Boards could further assist local agencies by encouraging and facilitating the remediation process for capable entities responsible for groundwater management. ACWA also believes the state should provide additional liability protection for agencies who undertake the cleanup of a contaminated groundwater basin. These recommendations are included in our Framework and we would be happy to work with Board staff on ways to accomplish them as appropriate.

ACWA is committed to working with state and local agencies and the affected areas to see how we can assist in reducing and remediating groundwater contamination in California. Our agencies have been working in their local communities for many years on this issue and we plan to continue those activities through the implementation of our Groundwater Framework Action Plan. I have included a copy of our Action Plan and matrix with a status update of all 22 recommendations for your information. If you have questions or need more information, please feel free to contact me at 916-441-4545 or [danielleb@acwa.com](mailto:danielleb@acwa.com).

Sincerely,



Danielle Blacet  
Senior Regulatory Advocate