



August 29, 2025

State Water Resources Control Board
Attention: Courtney Tyler, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comments on 2025 Safe Drinking Water Plan

Dear Water Board Members:

The Community Water Systems Alliance (CWSA) appreciates this opportunity to comment on the draft 2025 Safe Drinking Water Plan. CWSA comprises water districts and cities aligned with the principle of larger systems helping systems serving smaller, older, and poorer communities. We find that many of the concerns are common to drinking water systems of any size, but just magnified for those with fewer resources due to factors of history, size, geography, age, or income levels. Our comments reflect, in part, the unique purpose of CWSA to amplify the voice of those who are not heard, but also the views of larger and better-resourced systems that participate in our alliance.

3-1: Improve the means for large water systems to assist small systems with technical, managerial and financial expertise to operate and maintain the small water systems.

Comment: CWSA urges the State Water Board to identify specific ways to enable large systems to assist systems with limited resources, improve access for small systems to access funding assistance, and assign these responsibilities to a specific office.

We believe this concept has great potential that is not being tapped. For starters, we think this recommendation should be made into a concrete task, most likely for the Office of Sustainable Water Solutions. CWSA member agencies such as Mojave Water Agency, Coachella Valley Water District, San Geronio Pass Water Agency, and the Water Replenishment District of Southern California serve as successful models for this. CWSA even published short case studies that illustrate the concept and made recommendations for replicating successes elsewhere.

We noted that a slight variation of this recommendation was found in the 2020 Safe Drinking Water Plan.¹ However, we are unaware of any specific efforts by the State Water Board to follow through on this item, and did not find an indication of it among the accomplishments.

¹ The 2020 recommendation, also numbered 3-1, read: “The State Water Board will continue to encourage large water systems to assist small systems with technical knowledge and implementation, for example optimizing water treatment systems.”

The assistance of larger water systems is sometimes necessary to overcome barriers to access the State Water Board's own assistance. For example, San Geronio Pass Water Agency has provided bridge loans at no interest to at least two water systems that otherwise could not have completed projects with grant (or principal forgiveness) funds from the state, due to the time gap for payment. By comparison, CWSA operates under fiscal sponsorship of CalMutuals, and we have seen that organization's successful implementation of a contract with the Department of Water Resources to help droughtproof small water systems. This should inspire the State Water Board to innovate new ways to draw upon the willingness of larger systems to help their smaller, older, and poorer neighbors. CWSA is willing to be a partner where such endeavors are aligned with our mission.

Finally on this topic, CWSA urges the State Water Board to reduce or eliminate barriers small systems face in accessing financial assistance. The draft plan repeatedly states its highest priority to be consolidation of small systems. However, that is not a viable option in every case, and assistance for urgently needed projects to protect public health should not be denied solely based on non-consolidation. In addition, the plan should identify as a recommended action in the next five years to simplify and streamline the forms and the process of application for financial assistance.

3.3 THREATS TO THE SAFETY OF DRINKING WATER SUPPLIES
Drinking water sources have inherent vulnerabilities to contamination.

Comment: CWSA believes the State Water Board needs to prioritize the drinking water regulatory program to target the greatest risks to public health, and establish better foundations with scientific resources and economic analyses.

This section of the Plan discusses several classes of contaminants, including microbiological organisms, inorganic chemicals, radiological contaminants, and organic chemicals. Another subsection mentions Contaminants of Emerging Concern. In addition to this section, Chapter 4 discusses the challenges of compliance faced by small systems.

What is missing from the recital of a long list of potential drinking water contaminants is a discussion of the comparative risk to public health posed by these varied contaminants. This is an issue that is increasingly urgent to the drinking water community. As a state, we are approaching a practical limit on the ability to treat every possible constituent that may be present in water. This limit is multifaceted, including the complexity of treatment and distribution systems, and the potential to create unintended consequences.

The State Water Board has yet to seek funding for the Constituents of Emerging Concern in Drinking Water Program, or a Science Advisory Panel, as authorized by Senate Bill 230 from 2022.² Even without that program, there are examples of a disconnect between the Division of

² [Bill Text - SB-230 State Water Resources Control Board: Constituents of Emerging Concern in Drinking Water Program.](#)

Drinking Water (DDW) and the Office of Environmental Health Hazard Assessment (OEHHA). Most recently, DDW proceeded to set a drinking water standard for hexavalent chromium despite OEHHA's failure for more than ten years to reassess dozens of new studies on the human health risk of the substance. We believe it is of paramount importance for the State Water Board to assess the relative public health risk of contaminants considered for new or revised drinking water standards and proceed to address the greatest risks first. A better understanding is needed for several constituents currently under consideration, such as perchlorate, manganese, or microplastics, to name a few. The Division of Drinking Water should establish a more coordinated process with OEHHA for establishing the scientific basis for proceeding with primary drinking water standards for these and other constituents.

CWSA also strongly urges the Safe Drinking Water Plan to discuss prioritizing the regulatory program in a context of limits on the ability of public water systems and their customers to afford increases in the cost of drinking water. Affordability of drinking water is a prominent topic in the 2025 draft plan, however the document omits any discussion of the contribution of regulations and other requirements imposed by the State Water Board to rising water rates. CWSA presented an independent analysis of the proposed hexavalent chromium regulation that revealed significantly higher impacts on household water affordability than estimated by DDW, and documented household-level affordability impacts in large water systems that are not offset by economies of scale. The State Water Board should direct DDW to improve its economic analysis methods within the next five-year period. And the Safe Drinking Water Plan needs to add a discussion of the Board's role in balancing the achievable level of safety against access to water that is affordable.

Drinking Water Information Management

5.1 INTRODUCTION

The Division of Drinking Water (DDW) uses several data management systems to intake, manage, track, and report data and information relevant to operations of its various programs.

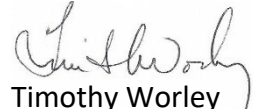
Comment: The State Water Board must reassess the data demands on drinking water systems to ensure that all information requested meets an essential need and is collected as efficiently as possible.

The amount of data and information requested by the State Water Board has increased enormously in recent years. CWSA is concerned that some of the data requested has limited value or reason to be held by the state. Water systems must invest resources to track and produce these data, only to have it disappear into a "black box" with no constructive use made of it. However, chapter 5 of the Plan on Drinking Water Information Management singly focuses on new and improved systems for managing this ever-increasing quantity of data, without addressing the quality, use, and value of the data taken in.

We urge the State Water Board to initiate an evaluation of its data program, focusing on the purpose for every piece of information (how it is used), the value of the data (whether that use has a strong meaning), the source of the requirement (whether a statutory mandate or not), and the cost burden to the state and to regulated water systems for providing the data.

We respectfully submit these suggestions in the spirit of improving the Safe Drinking Water Plan, to serve as a valuable guide to the complex issues facing the drinking water community in the next five years. We thank you for your consideration of our comments.

Sincerely,



Timothy Worley
Managing Director