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May 23, 2019

Chair E. Joaquin Esquivel and Members of the Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter – June 18, 2019 Board Meeting – FFY 2019 DWSRF IUP

Dear Chair Esquivel and Members of the Board,

The California Municipal Utilities Association (CMUA), representing 42 public water utilities, appreciates the opportunity provide comments on the 2019-2020 Drinking Water State Revolving Fund Intended Use Plan (DWSRF IUP) for the Federal Fiscal year 2019.

The Drinking Water State Revolving Fund (DWSRF) is an invaluable resource for water systems in California. As the state and water systems grapple with climate change, aging infrastructure, shifting hydrological profiles and growing population, it is imperative that the DWSRF adapt to meet the needs of systems into the future.

Acknowledging these challenges, CMUA is supportive of the language in the draft DWSRF IUP citing Executive Order B-40-17,¹ which called for the Board and the Department of Water Resources to continue to direct actions to “minimize water system leaks that waste large amounts of water” and that “use loans from the Drinking Water State Revolving Fund to prioritize local projects that reduce leaks and other water system losses.” The passage of SB 555 (Wolk, 2015), and the Making Conservation A Way of Life Legislation (AB 1668, SB 606), have placed water loss is at the forefront of drinking water systems activities. Combatting water loss in drinking water systems is a task that requires a tremendous amount of data, technical expertise and capital.

CMUA believes the DWSRF can provide funding for water systems to reduce water losses in two ways: providing funding for training and technical assistance for system operators and funding for activities that detect and reduce water losses.

The Board’s “Proposed Framework for Performance Standards for Water Loss”² recommends requiring urban retail water suppliers (URWS) conduct leakage component analyses (LCA) three times in the next eight years. While many of these URWSs have sophisticated drinking water operations, they will still require assistance in conducting these LCAs. DWSRF funding for training and technical assistance, whether it be conducted by the Board, or through a third party, such as the American Water Works Association will increase the success of water loss detection and remediation and is in line with Goal 6 of the Board’s Clean Water and Drinking Water Capacity Development Strategy.³ Additional

¹ https://www.gov.ca.gov/wp-content/uploads/2017/09/4.7.17_Exec_Order_B-40-17.pdf

² [SWRCB – Proposed Framework for Performance Standards for Water Loss](#)

³ [SWRCB – Clean Water and Drinking Water Capacity Development Strategy](#)

training could aid in the quality of water loss data submitted by urban retail water supplies as requested by the Board in its 2018 Electronic Annual Report which sought information regarding what drinking water systems activities to measure and reduce water loss.⁴

In addition to funding for training, DWSRF funding should also be available for activities that would detect and reduce real water losses such as the methods listed in the US EPA's 2010 study "Control and Mitigation of Drinking Water Losses in Distribution Systems"⁵ and discussed in the development of regulations related to implementation of SB 555.⁶

CMUA thanks the State Water Resources Control Board and its staff for consideration of these comments. If you have any questions, I can be reached at (916) 326-5806.

Sincerely,



Jonathan Young
Regulatory Advocate
California Municipal Utilities Association

⁴ <https://drinc.ca.gov/ear/EARFromTable.aspx?SurveyID=21&SectionID=15>

⁵ [US EPA Control and Mitigation of Drinking Water Losses in Distribution Systems](#)

⁶ [SWRCB - Proposed Framework for Performance Standards for Water Loss](#)