

Los Angeles  Department of Water & Power

ERIC GARCETTI
Mayor

Commission
MEL LEVINE, *President*
WILLIAM W. FUNDERBURK JR., *Vice President*
JILL BANKS BARAD
MICHAEL F. FLEMING
CHRISTINA E. NOONAN
BARBARA E. MOSCHOS, *Secretary*

MARCIE L. EDWARDS
General Manager

June 2, 2014

CalEnviroScreen
c/o Dr. John Faust
Chief of Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, California 94612

Dear Dr. Faust:

Subject: **Revised** LADWP Comments on the Draft CalEnviroScreen 2.0 Screening Tool

Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the California Environmental Protection Agency's (CalEPA) Office of Environmental Health Hazard Assessment (OEHHA) draft CalEnviroScreen 2.0 screening tool (CES 2.0) posted to its website on April 21, 2014. We appreciated the many workshops and meetings conducted by OEHHA that allowed us to better understand the basis of the new "Drinking Water Quality Indicator" (DWQI).

LADWP provides power and water services to nearly 4 million people living in the City of Los Angeles. As the largest municipal utility in the nation with a service area of 465 square miles, LADWP's water distribution system is highly complex and the water served comes from multiples sources. LADWP's Annual Drinking Water Quality Report (also known as a consumer confidence report) provides the best and most specific information on water quality in the various areas of the City of Los Angeles, so our customers can determine LA's tap water quality for themselves. The Water System has consistently provided customers with safe, high-quality drinking that often surpasses established drinking water standards. We achieve this goal in an economically and environmentally responsible manner.

LADWP understands that the CES 2.0 is primarily designed to assist CalEPA in carrying out its environmental justice mission that ensures the fair treatment of all Californians, including minority and low-income populations. We commend OEHHA for their efforts. What concerns LADWP about the draft CES 2.0 is one of the new indicators – a

Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013

111 N. Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles, CA 90051-5700
Telephone: (213) 367-4211 www.LADWP.com

“toxicity-based” Drinking Water Quality Indicator. Although specifically intended as just a screening tool to identify communities with the greatest need, the DWQI tool has drawn considerable media attention. Neighboring cities such as Glendale and Burbank have had to defend the water quality that they serve in response to several Los Angeles Times articles. LADWP recognizes this is not OEHHA’s intent, but it is the reality. LADWP anticipates it too will be the focus of a media article based on the DWQI. Thus, we appreciate OEHHA’s commitment to work with our staff to improve the accuracy of DWQIs in the City of Los Angeles service area using the appropriate water quality data; although we recognize that it may not be possible for OEHHA to make corrections before the final CES 2.0 is posted on July 1, 2014.

LADWP’s latest Public Health Goals (PHGs) Report is posted on our website, www.ladwp.com/waterquality. As part of the exercise in preparing these reports, we conducted a similar assessment to determine the cumulative risk from all detected contaminants in our treated water sources. The results of the assessment indicate that arsenic is the major contributor to risk, followed by disinfection byproducts and radionuclides. A key message point of the PHG report is that while PHGs may offer a higher level of protection, drinking water maximum contaminant levels (MCLs) established by the California Department of Public Health (CDPH) are achievable health protective levels which carry a *de minimus* level of risk. To approach levels of PHGs would require doubling the water rates in Los Angeles. The DWQI should clearly state that MCLs are protective of public health to minimize confusion and avoid any negative perception by the public of drinking water that is in full compliance with MCLs.

LADWP request OEHHA’s consideration of the following modifications highlighted in “bold red” to the text of the DWQI page:

- Page 31, Rationale paragraph for “Drinking Water Quality” Exposure Indicator, see added text.

“Low income and rural communities, particularly those served by small community water systems, can be disproportionately exposed to contaminants in their drinking water (VanDerslice, 2011; Balazs *et al.*, 2011). **In contrast, large metropolitan water systems are more stringently regulated, and serve water that is tested more frequently and are generally less likely to violate drinking water standards. The majority of Californians receive water that is in compliance with enforceable, health-based drinking water standards.**”
- Page 35, Drinking Water Quality maps: Recommend OEHHA clearly state that the DWQI values are statewide percentiles. It would also be helpful to list numerical range of the DWQI.

Because the state detection limit for reporting purposes (DLR) represents the minimum reportable level, LADWP requests OEHHA to consider using the DLR instead of the

PHG for contaminants with widely disparate levels. Arsenic, in particular, tends to skew the DWQI due to the fact that the PHG is so much lower than the DLR. This disproportionately raises the final DWQI for a water supply that has detected arsenic just above the 2 microgram per liter ($\mu\text{g/L}$) DLR as compared to another water supply that has no detection at the DLR, but likely contains arsenic at levels less than 2 $\mu\text{g/L}$ but greater than the PHG. For example, an arsenic sample result is 2.2 $\mu\text{g/L}$ and divided by the PHG of 0.004 $\mu\text{g/L}$, the resulting index would be 550. If the DLR was used in the denominator, the toxicity ratio would be 2.2 divided by 2.0 which would give a DWQI of 1.1 which is 500 times lower than 550, and would appropriately emphasize water that does not meet the MCL.

Lastly, LADWP recommends OEHHA work with LADWP and the drinking water community in future reassessments of the DWQI methodology. LADWP fully supports the comments submitted by the Association of California Water Agencies.

If you have any questions or would like to discuss our comments further, please feel free to contact me by telephone at (213) 367-1329 or by email at melinda.rho@ladwp.com.

Sincerely,



Melinda A. Rho
Manager of Regulatory Affairs and Consumer Protection

MR:bdc
By e-mail