



# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

GENERAL MANAGER  
Jim Barrett

ASSISTANT GENERAL MANAGER  
Robert Cheng

CLERK OF THE BOARD  
Sylvia Bermudez

ASSISTANT GENERAL MANAGER  
Dan Charlton

December 17, 2020

Attn: Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Submitted via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend:

Subject: Comment Letter – California’s Revised Total Coliform Rule

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment along with other stakeholders who may be affected by the State Water Resources Control Board (State Water Board) recommendation to revise the total coliform rule. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and ground management services to a population of about 300,000 throughout the Coachella Valley.

CVWD supports the State Water Board’s work to incorporate the federal revisions to the total coliform rule into State regulations. Comments provided in this letter address the following raw water monitoring provision in the proposed regulation:

*Quarterly monitoring at regular intervals provides for an on-going assessment of the raw water quality and alerts a public water system to changes in raw water quality and the resultant need for changes in disinfection treatment or additional corrective actions (Initial Statement of Reasons).*

*A raw water sample shall be collected each calendar quarter, with samples collected during the same month (first, second, or third) of each calendar quarter [22 CCR 64421 2(A)].*

CVWD agrees that quarterly monitoring provides on-going assessments at regular intervals of the raw water quality and alerts a public water system to changes that may require corrective actions. However, CVWD believes the proposed requirement that these raw water samples be collected during the same month (first, second, or third) of each calendar quarter is unwarranted and would adversely impact existing water system monitoring programs.

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
December 17, 2020  
Page 2

CVWD currently operates 97 active wells serving 3 public water systems within its 1,000 square mile service area. CVWD has developed and implemented monitoring programs that include approximately 4,500 samples collected per quarter. These monitoring programs are designed to efficiently perform monitoring for over 100 regulated and unregulated contaminants from sources and distribution system sites spread out over a large geographic area that include different monitoring frequencies, different monitoring schedules, and variable well operating schedules. These program schedules are driven by complex chemical analyses performed by one or more commercial laboratories that need to be coordinated with analysis that are performed in CVWD's State certified laboratory. These programs are designed to avoid redundant sampling events while balancing limited in-house laboratory capacity and resources and achieving cost effective commercial laboratory analytical and courier services. This balance is not driven by regular quarterly total coliform raw water monitoring performed at each active well in accordance with CVWD's domestic water supply permits. These raw water samples are currently collected during any month of the quarter when samplers visit these wells as part of other monitoring programs. This existing quarterly raw water monitoring has occurred for decades and has proven to be effective considering there have been no water-borne pathogen outbreaks within the communities CVWD serves and CVWD has never violated the total coliform MCL.

The proposal to prescriptively require this quarterly raw water monitoring be performed in the same month of each quarter would completely upset the balance achieved in CVWD's current monitoring programs. Instead of schedules being driven by complex chemical analyses, CVWD would now need to try scheduling these analyses around quarterly raw water monitoring that need to be performed during a specific month. This change would result in many redundant sampling events each quarter. Additional long trips to widely dispersed source locations directly impacts staff resources, adds vehicle operating expenses, and conflicts with CVWD's goal to reduce carbon emissions. This proposal seems particularly unreasonable considering current efforts by water agencies to manage staff resources and maintain drinking water services during a pandemic.

CVWD recommends that the Section 64421, paragraph 2(A), be revised to read, "A raw water sample shall be collected for each calendar quarter".

Please contact me at [sbigley@cvwd.org](mailto:sbigley@cvwd.org) or extension 2286 if you have any questions.

Sincerely,



Steve Bigley  
Director of Environmental Services

RM: ms\Env Srvs\WQ\2020\Dec\CVWD Response Rev Total Coliform.doc  
File: 0551.1111.2.1

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
December 17, 2020  
Page 3

cc: Jim Barrett  
Robert Cheng  
Dan Charlton  
Carrie Oliphant  
Katie Evans  
Kristen Johnson