



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

April 17, 2024

The Honorable Steven Padilla
California State Senate, District 18
1021 O Steet
Sacramento, CA 95814

RE: Senate Bill 1065- SPONSOR

Dear Senator Padilla:

The Coachella Valley Water District (CVWD) serves approximately 300,000 residents in its 1,000 square-miles of service area ranging from the San Gorgonio Pass to the Salton Sea, mostly within the Coachella Valley area of Riverside County, including small areas within Imperial and San Diego counties. Our services include domestic water, wastewater collection and treatment, agricultural water, regional stormwater protection, recycled water, and groundwater replenishment of imported water.

CVWD is pleased to be the sponsor of your legislation, Senate Bill (SB) 1065, which would grant up to three additional years to comply with the pending regulations to set a primary drinking water standard for Hexavalent Chromium VI, or “Chrome 6”, of 10 parts per billion.

CVWD supports the need to protect public health and intends to meet the new standard as soon as possible. Cost notwithstanding, the additional treatment infrastructure cannot be constructed in the two-year compliance period specified by the proposed regulation. The administrative process alone, including project design, publishing a Request for Bids, selecting a contractor, and CEQA compliance, will take a substantial amount of time before construction can begin.

While the current version of the proposed regulation does allow for a compliance plan to be submitted to the State Water Resources Control Board (State Water Board), it still requires compliance with the MCL by the applicable compliance date. As such, the intent of the regulation remains too vague and ambiguous to provide assurance that CVWD would not be in violation after the two-year compliance period ends, even if it is working in good faith to implement an approved compliance plan. SB 1065 would provide the needed clarity and assurance which is currently lacking from the proposed regulation.

Furthermore, the proposed regulation lacks consistency in the application of the compliance schedule, currently mandating a Tier 2 Public Notice for an MCL violation before the applicable compliance date. Requirements for a Tier 2 Public Notice of violation before the compliance date has not been part of the regulation of other contaminants and may set an unintended precedent going forward. SB 1065 provides clarity on this matter and encourages effective communication with water utility customers.

CVWD has been an industry leader in evaluating cost-effective treatment options for Chrome 6 and has worked with the State Water Board to complete a pilot study that may lead to a solution that significantly reduces the cost of meeting the Chrome 6 MCL in some circumstances. Any treatment solution, however, will require the construction of significant infrastructure to address all impacted wells, a project CVWD estimates will take a minimum of five years to complete from the adoption of the proposed regulation.

For these reasons, CVWD is grateful for your leadership on this issue, which is critical to the Coachella Valley region, and respectfully requests your colleagues to support this urgently needed legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Barrett". The signature is stylized and written in a cursive-like font.

J. M. Barrett
General Manager
Coachella Valley Water District

Cc: The Honorable Ben Allen, Chair of Senate Environmental Quality Committee
Members of the Senate Environmental Quality Committee
Gabrielle Meindl, Chief Consultant of the Senate Environmental Quality Committee