



September 28, 2023

State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento, CA 95814

Re: California’s Under-Reported Need for Lead Service Line Replacement Funds


Dear Chair Esquivel, Vice Chair D’Adamo, and Members of the Board:

Many of our organizations have submitted several written and oral comments regarding California’s need to fully quantify lead service lines, lead connectors such as goosenecks, and galvanized lines in the state’s drinking water systems. As detailed most recently in our June 23, 2023, comment letter, the state’s unwillingness to require water systems to inventory lead connectors and galvanized lines results in potential on-going exposure to lead and has resulted in the state losing hundreds of millions of dollars of federal funding.

Even more disturbing is the state's repeated failure to recognize that it has a lead problem, thus missing this unprecedented opportunity to protect Californians. One has only to read the news to learn that one in four (1700 out of 6800) childcare centers that have tested on-site water as required by California law have lead levels that exceed allowable limits. Some of these recorded lead levels in the water that young children drink measure hundreds of ppm, and even 11,000 ppm, lead -- 2200 times the allowable level. Unfortunately, the number of centers reporting elevated lead levels will likely grow as the 7,000 facilities, which have yet to comply with the law, and test their water. The exceedances at childcare centers up and down the state should serve as a warning that residents too may be exposed to unsafe levels of lead in their drinking water. We hoped that the Board would heed this most recent warning, but it appears reticent to do so; the board is not properly inventorying lead lines that contribute to lead contamination. With the federal funding offer, the state has no excuse to avoid full inventories, including lead connectors and galvanized pipes. California should take advantage of this historic opportunity to replace lead contaminated lines that likely affect a statistically significant number of taps.

USEPA recently issued its 7th Drinking Water Infrastructure Needs Survey and Assessment to Congress, which relies on the incomplete information gathered from systems in California. USEPA is allowing states to update their reported need over the next two months, and we again urge you to both require the quantification of lead connectors and galvanized lines that are or were downstream of said connectors, and to require their replacement. By inventorying these lines and reporting the data to USEPA, California will have access to funds for the lines' replacement, thereby protecting Californians -- including vulnerable children -- from on-going lead exposure.

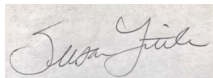
Sincerely,



Cori Bell
Senior Attorney
NRDC



Jenn Engstrom
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