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**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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June 9, 2022

The Honorable Bob J. Archuleta  
California State Senate  
1021 O Street, Suite 6720  
Sacramento, CA 95814

**RE: SB 1124 (Archuleta) Public health goal: primary drinking water standard: manganese – Oppose**

Dear Senator Archuleta:

The Orange County Water District (OCWD; the District) is writing to respectfully express our position of oppose to SB 1124 Public Health Goal (PHG) primary drinking water standard manganese as it presupposes a conclusion of scientific, technical, and economic analyses that is better assessed under the California's existing Safe Drinking Water Act (SDWA). Legislatively mandating a PHG and a primary Maximum Contaminant Level (MCL) for manganese presumes that the underlying science is strong; the prescribed regulation can make a meaningful improvement in public health; that it can do so at an appropriate cost to California and local communities; and that manganese should be prioritized over other contaminants for regulation. Such a presumption can have adverse economic impacts on water suppliers and the communities (including disadvantaged communities) they serve, not to mention delaying the regulation of higher priority drinking water contaminants.

By requiring the Office of Environmental Health Hazard Assessment (OEHHA) to set a PHG; and then requiring the State Water Board to adopt a primary MCL, SB 1124 presumes that regulating manganese in this manner will have a meaningful benefit to public health. Existing law has established a process of prioritizing and implementing drinking water regulations based on sound science, with appropriate technical and economic analysis to inform the best policy choice. OCWD strongly supports this science-based approach.

California already regulates manganese with a secondary MCL of 0.05 milligrams per liter based on aesthetic considerations, which is enforceable by the state Division of Drinking Water (DDW). Additionally, DDW has established health-based advisory drinking water Notification and Response Levels for manganese, which provides information to consumers and local government jurisdictions. These regulations were put in place according to established regulatory procedures. Furthermore, DDW recently initiated the process of developing revised Notification and Response levels for manganese; this represents an appropriate step to

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incorporate any new science and/or public health protection versus jumping to a mandated enforceable standard.

We appreciate that above-normal levels of manganese can cause consumer complaints and reduce trust of tap water, which is a concern to the entire water community. We applaud and encourage water providers that are taking steps to remove manganese, and support state approval of funding for such projects.

California and its many community water systems must prioritize the most serious threats to public health in water and from other environmental exposures. The regulatory avenue to make those determinations is open. Should further regulation of manganese be a top regulatory priority, DDW can simply request OEHHA to develop a PHG. If you have any questions and/or would like any additional information, please contact Legislative Affairs Liaison Alicia Dunkin at (714) 477-3750 or [adunkin@ocwd.com](mailto:adunkin@ocwd.com).

Sincerely,

A handwritten signature in cursive script that reads "Denis R. Bilodeau".

Denis R. Bilodeau, P.E.  
Director