MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

May 20, 1997

To: Board of Directors (Special Committee on Water Quality, Desalination, and Environmental Compliance--Information) (Engineering and Operations Committee--Information)

From: for General Manager — Edward J. Means III

Submitted by: Mark D. Beuhler, Director of Water Quality — Mark Beuhler

Subject: Update on Fluoridation

RECOMMENDATION

For information only.

EXECUTIVE SUMMARY

Implementation of the 1995 legislation that conditionally mandated fluoridation of drinking water by public water systems with at least 10,000 service connections continues. This effort may affect 93 of Metropolitan's Member Agencies and subagencies but does not directly impact Metropolitan. The legislative mandate for fluoridation is conditioned on the State providing funding. A proposed State regulation includes a funding priority list of all affected utilities based on the capital cost per service connection. The Los Angeles Department of Water and Power plans to initiate the first phase of its fluoridation program in 1998 and has expressed interest in MWD's plans regarding fluoridation. A Member Agency fluoridation workgroup will be formed to help provide input on this issue.

DETAILED REPORT

In 1995, the legislature passed and the Governor signed AB 733 which conditionally mandated that all public water systems serving 10,000 or more retail service connections must begin fluoridating their drinking water. The mandate was conditioned on the

State providing all funds for the installation, operation and maintenance of fluoridation facilities. When, and if, funding sources are identified, funding is to be distributed according to a priority list that is to be based on the "capital cost per service connection" with the lowest cost per service at the top of the list. The legislation does not apply directly to Metropolitan but 93 of the 166 public water systems in the state that are covered by the law are Metropolitan Member Agencies or subagencies.

All systems were required to submit an estimate of the capital costs to install fluoridation by July, 1996. The state reviewed, and in some cases, changed the water utility cost estimates, and developed a funding priority list based on fluoridation capital cost per service connection as specified in the law with the least cost systems at the top of the list. Estimates of O&M costs were not required and are not considered in the priority list rankings. Attachment No. 1 is the draft funding priority list excerpted from the proposed California Department of Health Services (CDHS) fluoridation regulations. The regulations and the priority list are expected to be finalized and adopted by late 1997. Further implementation actions will then be dependent on the availability of funding from CDHS.

Inquiries have been received from Member Agencies, subagencies, and others regarding Metropolitan's plans regarding fluoridation. LADWP recently presented its fluoridation plans at a meeting of the Member Agency Managers. At that meeting, they expressed interest in the possibility of Metropolitan fluoridating its supplies. In addition to LADWP, Moulton Niguel Water District and other agencies have expressed interest in the possible regional cost savings that might be realized if Member Agencies are required to fluoridate. Most are aware that the cost for Metropolitan to add fluoride at its five water treatment plants would be much less than for over 90 agencies to treat Metropolitan's finished water at several hundred turnout structures. CDHS and other advocates of drinking water fluoridation are very interested in the possibility of wholesalers fluoridating in lieu of retailers because of the potential cost savings.

From the cost estimates submitted by the 93 agencies in Metropolitan's service area, CDHS has separated the costs for these agencies to fluoridate Metropolitan's water from the costs to treat local well water or raw surface water sources. CDHS reports that the total estimated capital cost for these agencies to install facilities to fluoridate treated water delivered by Metropolitan is approximately $50 million. Metropolitan's Engineering Division estimates a capital cost of less than $5 million to add fluoridation facilities at all of our treatment plants.

Currently four agencies in Metropolitan's service area fluoridate their drinking water. These are the cities of Long Beach, Beverly Hills, Fountain Valley and Huntington Beach. LADWP is committed to beginning fluoridation and is completing design of treatment facilities for their first phase which includes all of their sources except their turnouts from Metropolitan. Design of these latter facilities was delayed to avoid costly duplication of facilities in the hope that Metropolitan would decide to fluoridate its water on behalf of the Member Agencies. LADWP plans to start adding fluoride to its other sources in early 1998. LADWP estimates it will cost them $4.5 million to install fluoridation treatment facilities at their seven most-used Metropolitan turnouts. The relatively high cost for agencies to treat at Metropolitan

turnouts is due, in large part, to high land-acquisition costs. This is also true for many of Metropolitan's other agencies.

Attachment No. 2 is a letter from Southern California Citizens for Better Dental Health advocating that Metropolitan begin to fluoridate its water. Attachment No. 3 is a copy of the General Manager's response which indicates that your Board has not made any decision on fluoridation and no specific request has been received from any Member Agency.

CDHS indicates that they, along with the California Dental Association and other dental health groups, are actively seeking fluoridation funding from private foundations and the federal government. They are confident that funding will be obtained but no specific sources have yet been identified.

A Member Agency workgroup is being established to facilitate discussion of regulatory issues related to drinking water fluoridation. Metropolitan staff will continue to respond to requests for information and assistance from Member Agencies and to inquiries from the public. The Board will be notified of any new developments regarding Member Agency requests, availability of funding for fluoridation facilities, or other activities.

CEA/ly

Attachments

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FLUORIDATION TREATMENT CAPITAL COST ESTIMATES (PRIORITY LIST)

	SYSTEM NO.	SYSTEM NAME	COST USED FOR COMPARISON	NUMBER OF SERVICE CONNECTIONS	COST PER SERVICE CONNECTION
*	3710010	Helix Water District	$ 152,000	53,555	$ 2.84
*	5610017	Ventura , City of	$ 76,000	25,875	$ 2.94
	4110013	Daly City, City of	$ 39,000	8,856	$ 4.40
*	3710006	Escondido, City of	$ 101,000	22,616	$ 4.47
	4210011	Santa Maria, City of	$ 75,000	15,703	$ 4.78
	3410009	Fair Oaks Water District	$ 115,000	20,229	$ 5.68
*	1910083	Manhattan Beach, City of	$ 72,000	12,591	$ 5.72
*	3710025	Sweetwater Authority	$ 190,000	32,931	$ 5.77
	4210010	Santa Barbara, City of	$ 157,000	24,544	$ 6.40
	0910001	El Dorado Irrigation District	$ 172,000	24,550	$ 7.01
	3410006	Citrus Heights Water District	$ 133,000	17,982	$ 7.40
	4410010	Santa Cruz, City of	$ 175,000	21,949	$ 7.97
	3610039	San Bernardino, City of	$ 317,000	39,453	$ 8.03
*	3310009	Eastern Municipal Water District	$ 742,000	84,839	$ 8.75
*	3710037	Padre Dam Municipal Water District	$ 189,000	21,587	$ 8.76
*	1910067	Los Angeles, City of	$ 5,845,000	656,572	$ 8.90
	2810003	Napa, City of	$ 189,000	21,172	$ 8.93
*	3710020	San Diego, City of	$ 2,188,000	241,833	$ 9.05
*	3710034	Otay Water District	$ 253,000	26,412	$ 9.58
*	3310031	Riverside, City of	$ 575,000	58,586	$ 9.81
	1910173	Whittier, City of	$ 121,000	11,500	$ 10.52
	3410020	Sacramento, City of	$ 1,260,000	112,859	$ 11.16
*	1910139	California American Water Company - San Marino	$ 160,000	13,902	$ 11.51
*	3710021	San Dieguito Water District	$ 121,000	10,044	$ 12.05
	3610024	Hesperia Water District	$ 230,000	18,387	$ 12.51
*	1910179	Burbank, City of	$ 324,000	25,731	$ 12.59
	2710004	California American Water Company - Monterey	$ 485,000	36,587	$ 13.26
*	3010073	Moulton Niguel Water District	$ 574,000	41,266	$ 13.91
*	3010101	Santa Margarita Water District	$ 390,000	27,908	$ 13.97
*	1910239	Lakewood, City of	$ 291,000	20,639	$ 14.10
	2110003	North Marin Water District	$ 251,000	17,195	$ 14.60
*	3010037	Yorba Linda Water District	$ 294,000	19,848	$ 14.81
*	3710015	Poway, City of	$ 187,000	12,520	$ 14.94
	3110025	Placer County Water Agency	$ 161,000	10,622	$ 15.16
	5010010	Modesto, City of	$ 796,000	52,219	$ 15.24
*	1910126	Pomona, City of	$ 428,000	27,617	$ 15.50
	3410004	Carmichael Water District	$ 196,000	10,861	$ 18.05
*	1910043	Glendale, City of	$ 590,000	32,013	$ 18.43
*	3610018	Cucamonga Community Water District	$ 644,000	34,398	$ 18.72
	3910011	Tracy, City of	$ 331,000	16,936	$ 19.54
*	1910234	Walnut Valley Water District	$ 507,000	25,390	$ 19.97
	3910012	Stockton, City of	$ 561,000	28,033	$ 20.01
*	1910146	Santa Monica, City of	$ 318,000	15,810	$ 20.11
*	3710027	Vista Irrigation District	$ 479,000	23,794	$ 20.13
*	3010018	La Habra, City of	$ 234,000	11,506	$ 20.34
*	1910009	Valley County Water District	$ 242,000	11,669	$ 20.74
*	3310012	Elsinore Valley Municipal Water District	$ 450,000	21,310	$ 21.12
*	1910051	Inglewood, City of	$ 313,000	14,721	$ 21.26

	SYSTEM NO.	SYSTEM NAME	COST USED FOR COMPARISON	NUMBER OF SERVICE CONNECTIONS	COST PER SERVICE CONNECTION
*	3710005	Carlsbad Municipal Water District	$ 362,000	16,928	$ 21.38
	4210004	Goleta Water District	$ 303,000	14,043	$ 21.58
*	1910213	Torrance, City of	$ 553,000	25,582	$ 21.62
*	1910152	South Gate, City of	$ 328,000	14,719	$ 22.28
*	1910155	Southern California Water Company - Southwest	$ 1,148,000	49,392	$ 23.24
	1510017	Indian Wells Valley Water District	$ 253,000	10,830	$ 23.36
*	1910039	San Gabriel Valley Water Company - El Monte	$ 1,019,000	42,575	$ 23.93
	1610003	Hanford, City of	$ 262,000	10,813	$ 24.23
*	3310037	Corona, City of	$ 616,000	25,321	$ 24.33
*	3010062	Garden Grove, City of	$ 823,000	33,411	$ 24.63
	3610003	Apple Valley Ranchos Water Community	$ 302,000	12,173	$ 24.81
*	3610036	Chino Hills, City of	$ 381,000	15,197	$ 25.07
*	3010064	Westminster, City of	$ 483,000	19,096	$ 25.29
	4310011	San Jose Water Company	$ 5,281,000	205,904	$ 25.65
*	3610012	Chino, City of	$ 344,000	13,357	$ 25.75
	3910004	Lodi, City of	$ 547,000	20,963	$ 26.09
*	5610007	Oxnard , City of	$ 782,000	29,694	$ 26.34
*	1910019	Cerritos, City of	$ 408,000	15,243	$ 26.77
*	1910205	Suburban Water Systems - San Jose Hills	$ 903,000	33,485	$ 26.97
*	1910059	Suburban Water Systems - La Mirada	$ 383,000	14,048	$ 27.26
*	1910092	Monterey Park, City of	$ 332,000	12,103	$ 27.43
*	1910174	Suburban Water Systems - Whittier	$ 481,000	17,477	$ 27.52
*	1910026	Compton, City of	$ 377,000	13,459	$ 28.01
*	1910124	Pasadena, City of	$ 1,056,000	37,080	$ 28.48
*	3310022	Lake Hemet Municipal Water District	$ 358,000	12,436	$ 28.79
*	1910142	Southern California Water Company - San Dimas	$ 443,000	15,190	$ 29.16
	4510005	Redding, City of	$ 695,000	23,610	$ 29.44
	3610037	Redlands, City of	$ 546,000	18,447	$ 29.60
	3910005	Manteca, City of	$ 338,000	11,417	$ 29.60
*	3710014	Oceanside, City of	$ 1,134,000	38,071	$ 29.79
	3610038	Rialto, City of	$ 331,000	11,089	$ 29.85
	4310022	Great Oaks Water Company	$ 540,000	17,958	$ 30.07
	4310014	Sunnyvale, City of	$ 853,000	27,673	$ 30.82
*	3310021	Jurupa Community Services District	$ 335,000	10,667	$ 31.41
	3410001	Arcade- Town & County	$ 495,000	15,463	$ 32.01
	3610052	Victor Valley Water District	$ 504,000	15,625	$ 32.26
*	3010023	Newport Beach, City of	$ 812,000	24,576	$ 33.04
	3610064	East Valley Water District	$ 613,000	18,303	$ 33.49
*	1910225	Las Virgenes Municipal Water District	$ 606,000	17,994	$ 33.68
*	3710001	California American Water Company - Coronado	$ 693,000	20,229	$ 34.26
*	3610034	Ontario, City of	$ 1,064,000	30,927	$ 34.40
	3910001	California Water Service Company - Stockton	$ 1,451,000	40,778	$ 35.58
*	1910033	Dominguez Water Agency	$ 1,178,000	32,000	$ 36.81
	5410015	Tulare, City of	$ 427,000	10,785	$ 39.59
	5710006	Woodland, City of	$ 461,000	11,468	$ 40.20
*	3710029	Olivenhain Municipal Water District	$ 528,000	13,108	$ 40.28
*	1910003	Arcadia, City of	$ 520,000	12,901	$ 40.31
*	1910008	Azusa Valley Water Company	$ 588,000	14,576	$ 40.34
	4410011	Watsonville, City of	$ 485,000	12,018	$ 40.36
*	3010003	Buena Park, City of	$ 729,000	18,000	$ 40.50
	4310005	Milpitas, City of	$ 558,000	13,337	$ 41.84
	1910017	Santa Clarita Water Company	$ 816,000	19,503	$ 41.84

	SYSTEM NO.	SYSTEM NAME	COST USED FOR COMPARISON	NUMBER OF SERVICE CONNECTIONS	COST PER SERVICE CONNECTION
	1910240	Valencia Water Company	$ 648,000	15,364	$ 42.18
	3610004	West San Bernardino Water District	$ 561,000	13,050	$ 42.99
	0910002	South Tahoe Public Utilities District	$ 532,000	12,219	$ 43.54
*	5610059	Southern California Water Company - Simi Valley	$ 520,000	11,852	$ 43.87
*	3010027	Orange, City of	$ 1,391,000	30,744	$ 45.24
	5410010	Porterville, City of	$ 517,000	11,271	$ 45.87
	4410017	Soquel Creek Water District	$ 605,000	12,820	$ 47.19
	4110023	San Bruno, City of	$ 341,000	7,116	$ 47.92
*	1910001	Alhambra, City of	$ 766,000	15,956	$ 48.01
*	3010022	Southern California Water Company-West Orange County	$ 899,000	18,711	$ 48.05
*	3010091	Los Alisos Water District	$ 575,000	11,735	$ 49.00
*	3610050	Upland, City of	$ 1,001,000	20,229	$ 49.48
	3410024	Northridge Water District	$ 1,028,000	18,657	$ 55.10
	1010003	Clovis, City of	$ 905,000	16,271	$ 55.62
*	3010004	Mesa Consolidated Water District	$ 1,254,000	22,370	$ 56.06
*	3610041	San Gabriel Valley Water Conpany - Fontana	$ 1,647,000	29,314	$ 56.18
	3410010	Citizens Utilities Company of California - Suburban	$ 566,000	10,001	$ 56.59
*	3010038	Santa Ana, City of	$ 2,526,000	43,613	$ 57.92
*	3010092	Irvine Ranch Water District	$ 2,898,000	49,991	$ 57.97
*	1910211	Park Water Company - Bellflower	$ 944,000	16,049	$ 58.82
*	3010010	Fullerton, City of	$ 1,692,000	28,077	$ 60.26
	4310007	Mountain View, City of	$ 916,000	15,069	$ 60.79
*	3010036	San Clemente, City of	$ 836,000	13,696	$ 61.04
*	3010079	El Toro Water District	$ 617,000	10,020	$ 61.58
	5610020	Thousand Oaks, City of	$ 825,000	13,122	$ 62.87
	3610029	Monte Vista Water District	$ 682,000	10,837	$ 62.93
*	1910004	Southern California Water Company - Artesia	$ 646,000	10,203	$ 63.31
	4210016	Southern California Water Company - Orcutt	$ 639,000	10,066	$ 63.48
	4110008	California Water Service Company - San Mateo	$ 1,577,000	24,755	$ 63.70
*	1310038	Rancho California Water District	$ 1,347,000	20,728	$ 64.98
	3410017	Citizens Utilities Company of California - Parkway	$ 853,000	12,891	$ 66.17
*	1910024	Southern California Water Company - Claremont	$ 680,000	10,198	$ 66.68
*	1910044	Glendora, City of	$ 909,000	13,221	$ 68.75
*	3010001	Anaheim, City of	$ 3,932,000	56,949	$ 69.04
	5710001	Davis, City of	$ 774,000	11,194	$ 69.14
*	1910134	California Water Service Company- Hermosa/Redondo	$ 1,716,000	24,788	$ 69.23
	1010007	Fresno, City of	$ 6,224,000	89,718	$ 69.37
	1910102	Palmdale Water District	$ 1,630,000	23,081	$ 70.62
	4310012	Santa Clara, City of	$ 1,792,000	24,450	$ 73.29
	2710010	California Water Service Company - Salinas	$ 1,468,000	19,786	$ 74.19
	4910006	Petaluma, City of	$ 1,131,000	15,167	$ 74.57
*	1910036	California Water Service Company - East Los Angeles	$ 1,994,000	26,372	$ 75.61
	3410013	Citizens Utilities Company of California - Lincoln Oaks	$ 1,009,000	12,808	$ 78.78
	3310001	Coachella Valley Water District	$ 4,681,000	58,353	$ 80.22
	5010019	Turlock, City of	$ 1,097,000	13,229	$ 82.92
	5410016	California Water Service Company - Visalia	$ 2,183,000	26,151	$ 83.48

	SYSTEM NO.	SYSTEM NAME	COST USED FOR COMPARISON	NUMBER OF SERVICE CONNECTIONS	COST PER SERVICE CONNECTION
	5610023	Waterworks District 8-Simi Valley	$1,651,000	18,924	$ 87.24
	0410002	California Water Service Company - Chico	$1,876,000	20,703	$ 90.61
*	1910104	California Water Service Company - Palos Verdes	$2,125,000	23,399	$ 90.82
	3410015	Southern California Water Company - Cordova	$1,003,000	10,460	$ 95.89
	4910009	Santa Rosa, City of	$3,708,000	38,388	$ 96.59
*	1910194	Rowland Water District	$1,171,000	12,054	$ 97.15
	1510003	California Water Service Company - Bakersfield	$5,368,000	54,393	$ 98.69
	5610040	California American Water Company - Village District	$2,220,000	17,048	$ 130.22
	3310005	Desert Water Agency	$2,746,000	18,803	$ 146.04
	0110003	California Water Service Company - Livermore	$2,238,000	14,951	$ 149.69
*	3010046	Tustin, City of	$2,318,000	13,545	$ 171.13
	4310001	California Water Service Company - Los Altos Suburban	$3,116,000	17,811	$ 174.95
	4110007	California Water Service Company - San Carlos	$1,779,000	10,005	$ 177.81
	1910070	Los Angeles, County Water Works District 4&34-Lancaster	$5,900,000	32,197	$ 183.25
	1510031	Bakersfield, City of	$1,853,000	10,066	$ 184.09
	4110009	California Water Service Company - South San Francisco	$2,585,000	12,798	$ 201.98
*	3010053	Huntington Beach, City of	$ 241,000	1,002	$ 240.52
	4110006	California Water Service Company - Bear Gulch	$4,649,000	16,936	$ 274.50
*	1910034	Downey, City of	$7,547,000	23,000	$ 328.13
	4110022	Redwood City	$8,988,000	19,807	$ 453.78

*Metropolitan Member Agency or subagency.

Southern California Citizens for Better Dental Health
510 South Vermont Avenue, Second Floor, Los Angeles, California 90020
Telephone: (213) 738-2060 FAX: (213) 738-6578

March 13, 1997

Mr. John R. Wodraska
General Manager
Metropolitan Water District
350 South Grand Avenue, Third Floor
Los Angeles, California 90071-3123

Dear Mr. Wodraska:

With the tremendous costs of health care coverage on the rise, wouldn't it be prudent to implement a public health measure that prevents tooth decay, one of the most prevalent diseases in the population? For over 50 years, community water fluoridation has proven to significantly reduce the incidence of tooth decay in every community in which it has been implemented.

Virtually all major national and international health organizations endorse water fluoridation. These organizations include: the American Dental Association, American Medical Association, United States Public Health Services, Food and Drug Administration and the World Health Organization.

A broad based coalition of childrens' health advocates, doctors, scientists and academics are emerging as leaders in the effort to fluoridate Southern California's water supply. In July 1996 the Los Angeles Department of Water and Power (DWP) committed to fluoridating their portion of Los Angeles' water supply, and funds were allocated for the initial design and development phase.

We are respectfully requesting that the Metropolitan Water District of Southern California (MWD) follow suit and continue that same commitment to fluoridation by pledging to fluoridate its water supply as well. Los Angeles, as one of your founding member agencies is the only U.S. city with more than 1.5 million inhabitants that remains unfluoridated. This is not only embarrassing, but also unfair to the dental health of our children and adults.

The Metropolitan Water District of Southern California serves approximately 90 of the public water systems that are impacted by AB733 (Fluoridation). If MWD fluoridates the water
they supply to these 90 water systems, over $50 million would be saved in the implementation of fluoridation in the MWD service areas. This would be of tremendous benefit to your member agencies.

Your decision in favor of fluoridation can help improve the dental health of the nearly 16 million water users served by your 27 member public agencies. We encourage you to move quickly to bring fluoridation to the MWD.

Enclosed is an information kit for your reference. We will follow up with you shortly to schedule an in-person meeting. Should you have any questions before that time, please contact Dr. Tim Collins at: (213) 738-2060.

Sincerely,

Lauraine Barber

Tim Collins

Lauraine Barber
Chair
So. CA. for Better Dental Health

Tim Collins, D.D.S., M.P.H.
Project Coordinator
So. CA. Citizens for Better Dental Health

/krl

cc: Metropolitan Water District Board of Directors

enclosure

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

May 20, 1997

Southern California Citizens
for Better Dental Health
510 Vermont Avenue, 2nd Floor
Los Angeles, CA 90020

Attention: Laurine Barber, Chair
Dr. Tim Collins, Project Coordinator

Thank you for your recent letter dated March 13, 1997 urging the Metropolitan Water District of Southern California (Metropolitan) to initiate fluoridation of all drinking water we serve through our 27 Member Agencies. Drinking water fluoridation was discussed at a meeting of our Member Agency Managers in April and in a conference session at the Association of California Water Agencies (ACWA) on May 8 in Lake Tahoe.

Currently in our six-county service area, only two of our Member Agencies, the Cities of Long Beach and Beverly Hills, and two subagencies, the Cities of Fountain Valley and Huntington Beach in Orange County, have elected to provide fluoridation of their drinking water. As you noted, the City of Los Angeles Department of Water and Power (LADWP) has facilities under design to initiate fluoridation treatment in 1998 at all of its sources except its connections to Metropolitan. LADWP is temporarily delaying action on the Metropolitan connections to avoid costly duplication of facilities in the hope that Metropolitan's Board of Directors will decide on fluoridation at its five regional water treatment plants.

Ninety-three of our Member Agencies and their subagencies serve at least 10,000 service connections and are therefore included in the conditional mandate to fluoridate. Metropolitan also serves treated water to about 100 additional water agencies, which have less than 10,000 service connections that are not covered by the new law.

At this time, Metropolitan has not made a decision on whether or not to initiate fluoridation at any of our treatment plants. Such a decision would have to be made by our 51-member Board of Directors who are elected or appointed from our 27 Member Agencies. Such a decision would only be made after careful and full consideration of the issue and a full opportunity for the Directors to discuss the issue with the Member Agencies and their subagencies.

While, in general, it does not appear there is much disagreement that fluoride is effective in preventing tooth decay or that drinking water fluoridation is a cost-effective and safe procedure, other concerns and issues have been raised by our Member Agencies. Two of the significant areas of concern related to the idea of Metropolitan fluoridating its treated water on behalf of the Member Agencies are as follows:

1. Funding: It is recognized that "economies of scale" favor installation of fluoridation facilities at five large treatment plants rather than at several hundred turnout locations where our retail water agencies get deliveries from Metropolitan or a Member Agency. The California Department of Health Services reports that cost estimates submitted by the 93 water agencies in our service area show the capital cost for them to fluoridate Metropolitan water is about $50 million. The preliminary engineering estimate for Metropolitan's five treatment plants is less than $5 million, although this does not include any Member Agency cost impacts.

   However, there is no requirement in the law for any agency to initiate fluoridation unless the State provides the funds to construct and operate facilities. There is also no provision for Metropolitan to receive funding. Member Agencies have expressed concern that funding for fluoridating local agency groundwater sources will not be available for all agencies that get treated water from Metropolitan. Agencies are also concerned that once facilities are installed, the State will not be able to fund operation and maintenance costs in all future years and the cost burden will be shifted to the local water agencies.

2. Public notice requirements: If water were fluoridated by Metropolitan, it would be delivered to many agencies who are ranked low on the funding priority list that may not receive state funding and therefore would not be obligated to fluoridate. It will also be delivered to the approximately 100 smaller systems not covered by the law. Almost all of these agencies have their own local groundwater or surface water supplies and use Metropolitan's supply to supplement their sources. There is concern that the public will be confused about the public notices required upon initiation of fluoridation and the stopping and re-starting fluoridation that may occur if state funding for operation is not available each year. The complexity and the high daily and seasonal variability of the flow of water in each system would make it very difficult to advise customers or dentists as to what fluoride level they will be receiving at any given time.

   Issues like these and other concerns will need to be addressed as implementation of the fluoridation legislation and regulations proceeds.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Metropolitan is planning to create a Member Agency workgroup to facilitate discussion of regulatory issues related to drinking water fluoridation. At an appropriate time within the next six months, we would like to ask you to address this workgroup and to participate in an exchange of ideas. If you have any questions, please feel free to call Mark Beuhler, Director of Water Quality, at (213) 217-6647.

Yours truly,

Edward S. Means III

for John R. Wodraska
General Manager

CEA\ly

Enclosure (So. Cal. Citizens for Better Dental Health's letter of March 13)

cc w/ enclosure: Board of Directors
Member Agency Managers

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