ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

April 2, 2012

Ms. Janice Zinky
Division of Water Quality
State Water Resources Control Board (SWRCB)
1001 I Street, 16th Floor
Sacramento, CA 95814

Re: "Communities that Rely on Contaminated Groundwater"
SWRQB Draft Report to the Legislature – February 2012

Dear Madam/Sir:

The Orange County Water District (OCWD) is an agency formed by the State of California in 1933 to protect and manage the Orange County groundwater basin. The OCWD is located in a highly urbanized area of northern Orange County. There are over 20 water utilities within our basin serving a population of over 2.3 million people. Over 225 drinking water wells are within our basin, which provide approximately 65-70 percent of the drinking water. Imported treated surface water (purchased water from a wholesaler) from northern California and the Colorado River supplies the remainder.

On behalf of our Groundwater Producers, OCWD assumes all monitoring, analytical and reporting responsibilities to comply with state and federal drinking water regulations for groundwater sources. Compliance samples are collected at the wellhead, prior to treatment (i.e., raw water), to assess (1) ambient groundwater quality and (2) concentrations of regulated chemicals with respective regulatory maximum contaminant levels (MCLs). Analyses are performed at OCWD's new state certified Advanced Quality Assurance Laboratory located on-site for inorganic and organic analytes. Radioactivity testing is conducted by state certified laboratories.

OCWD reviewed the State Water Resources Control Board's (SWRCB) draft report to the Legislature on "Communities that Rely on Contaminated Groundwater" dated February 2012. We appreciate the opportunity to review the draft report and provide the following comments for your consideration in finalizing the report to the Legislature.

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1.0 Draft Report

1.1 Groundwater Quality: Perspective of Extent of Contamination and Quality of Water Served to the Public

The report will be read by the State Legislature, other agencies and the public summarizing the communities that rely on contaminated groundwater that is used for potable supply, but it does not indentify communities where contaminated groundwater sources have treatment and delivering water that meets drinking water maximum contaminant levels (MCLs). Providing information on communities that have groundwater treatment provides perspective on the actual number of communities that have contaminated groundwater and need funding for cleanup or need to seek other source water options. The "Summary of Findings (page 9)" states that 682 communities rely on contaminated groundwater as a primary source of drinking water with 508 relying entirely on groundwater for their drinking water supply. Without the added information of how many communities currently are treating groundwater contamination to meet drinking water standards introduces ambiguity in evaluating the 682 communities. Of the 682 communities, how many have treatment that delivers potable water? Is 10%, 25%, etc. of the communities serving water that does not meet drinking water standards?

The Executive Summary and report clearly states that the findings in the report do not necessarily reflect the quality of water (i.e., finished, treated groundwater) that is delivered to the public as potable supply. The report, as required by the statue, discusses funding sources and other options to address groundwater sources that are contaminated with a contaminant that exceeds a primary MCL. The Legislature (and public) needs additional information to better understand the extent of needed resources (i.e., funding) to address contaminated groundwater.

Recommendation 1: Add a section to the report to provide information and discuss the number of communities and number of groundwater sources that have current treatment to reduce contaminants to levels that meet drinking water standards. This information will be beneficial in better understanding the discussion on funding sources and status of funding.

Recommendation 2: Many of the tables in the report could include a column noting if a community water system currently has groundwater treatment that delivers water meeting drinking water standards:

- Table 1.3
- Table 2.1
- Appendix 8 – priority location to include the additional information

1.2 Principal Contaminants – Radionuclide: Gross Alpha and Appendix 8

The CA Department of Public Health (CDPH) Division of Drinking Water and Environmental Management Water Quality Monitoring database (CDPH database) was used as the source of information to compile data used for the SWRCB report for the time period January 1, 2002 through December 31, 2010. OCWD focused review of Appendix 8 information to communities located in Orange County and identified six groundwater sources that are listed having gross alpha exceeding the primary MCL of 15 pCi/L (see Attachment 3 – Appendix 8, pages 183-184 and OCWD excel file).

OCWD retrieved data from the CDPH database for the report period for groundwater wells listed in Appendix 8 and found that the compliance with the gross alpha MCL did not exclude the gross alpha contribution from uranium to assess compliance with the gross alpha MCL (attached OCWD excel file of CDPH data). The laboratory analysis used to measure total gross alpha excludes the radon contribution but includes the uranium contribution. Therefore, compliance with the gross alpha MCL requires subtracting the alpha particle activity originating from uranium, then comparing the result to the 15 pCi/L MCL. Listed below is an excerpt from the CA Code of Regulations on radioactivity and compliance MCL determination for gross alpha (see Attachment 1):

Article 5. Radioactivity

§64442. MCLs and Monitoring - Gross Alpha Particle Activity, Radium-226, Radium-228, and Uranium

(a) Each community and nontransient-noncommunity water system (system) shall comply with the primary MCLs in Table 64442 in the drinking water supplied to the public and use the DLRs for reporting monitoring results:

Table 64442
Radionuclide Maximum Contaminant Levels (MCLs) and Detection Levels for Purposes of Reporting (DLRs)

Radionuclide	*MCL*	*DLR*
Radium-226	5 pCi/L (combined radium-226 & -228)	1 pCi/L
Radium–228		1 pCi/L
Gross Alpha particle activity (excluding radon and uranium)	15 pCi/L	3 pCi/L
Uranium	20 pCi/L	1 pCi/L

Attachment 3 contains excerpts from Appendix 8 of the report listing the six groundwater sources on pages 183-84 having incorrect reference to exceeding the gross alpha primary MCL. OCWD recommends that the gross alpha exceedances listed for community water systems in Appendix 8 be reviewed and revised, as needed. Revisions to gross alpha MCL discussions in other sections of the report may be needed based on review of Appendix 8 listing and the CDPH database.

1.3 Conclusions

OCWD recommends that an additional bullet in the "Conclusions" section of the draft report (page 18) be included to consider the following:

- Many identified communities that rely on contaminated groundwater for drinking water supply provide raw water treatment resulting in finished treated water that reduces principal contaminants to meet drinking water standards (i.e., MCLs).

2.0 Comments: Appendix 8 and Appendix 1

2.1 Units of Measurement

The tables in Appendix 8 list the public water system, the groundwater well, principal contaminant that has concentrations exceeding the MCL, the numerical MCL, most recent detection exceeding the MCL, etc. Adding a column of "units" will greatly enhance the quality of the data tables and provide the context with the numerical MCL. Since the tables includes a broad range of contaminants with varying units for the MCL, a "units column" will greatly aid the reader in evaluating the data (see Attachment 3, excerpts Appendix 8, pages 182-184). In addition, the listed numerical MCL for nitrate + nitrite is not consistent with CA MCL and should be revised to reflect the MCL in units of mg/L. For example:

Prin. Contaminant	MCL	Units	Comments
Nitrate (as NO3)	45	mg/L	add mg/L
Nitrate + Nitrite	10000		revise to same units as regulation
Nitrate + Nitrite	10	mg/L	
Perchlorate	6	ug/L	
PCE	5	ug/L	

2.2 Bromate – Incorrect Listing as Raw Groundwater

Attachment 3 contains an excerpt from Appendix 8, page 182 showing a public water system groundwater well as having raw, ambient bromate measured in June 2008. The water utility has contacted the analyzing laboratory who will be

sending a written letter to CDHP advising of the error of posting bromate as a constituent analyzed in an ambient groundwater sample. This entry should be removed from the table and reflected in revising Table1.3 (see Attachment 2).

2.3 Radionuclide: Gross Alpha Exceeding the MCL

As described in Section 1.2 above, OCWD retrieved the CDHP data (attached excel file) for the six groundwater sources listed on the tables in Appendix 8, pages 183-184, and evaluated compliance with the gross alpha MCL (calculations provided in attached excel file). The six listed groundwater wells should be removed from these tables as the gross alpha MCL has not been exceeded.

2.4 Table1.3: Revision

The number of identified community water systems for Orange County is 10 not 14 as discussed above under bromate and gross alpha listing (see Attachment 1, page 31). Attachment 3 lists the 10 community water systems that should be listed for Orange County.

OCWD appreciates the opportunity to review and comment on the draft report to the Legislature on the "Communities that Rely on Contaminated Groundwater." If you have questions or require additional information, please contact me at any time. We look forward to the final report to the Legislature.

Sincerely,

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Attachments:
Attachment 1: Excerpt CCR – Radioactivity MCLs
Attachment 2: Appendix 1: Table 3.1 – revisions
Attachment 3: Appendix 8: Pages 182-184 – revisions
Attachment 4: OCWD Excel CDPH database (excerpts for OC area and calculations)

ATTACHMENT 1:
Excerpts from the CA Code of Regulations pertaining to "Radioactivity MCLs"

CA Code of Regulations

Title 22. Social Security
Division 4. Environmental Health
Chapter 15. Domestic Water Quality and Monitoring Regulations

Excerpts on Radioactivity:

Article 5. Radioactivity

§64442. MCLs and Monitoring - Gross Alpha Particle Activity, Radium-226, Radium-228, and Uranium

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Radium–228		1 pCi/L
Gross Alpha particle activity (excluding radon and uranium)	15 pCi/L	3 pCi/L
Uranium	20 pCi/L	1 pCi/L

Last updated September 22, 2011 – from Titles 17 and 22 California Code of Regulations
California Regulations Related to Drinking Water

The gross alpha MCL is 15 pCi/L. Compliance with the gross alpha MCL **excludes the contribution of alpha particle activity from radon and uranium**. The laboratory analysis to measure total gross alpha excludes the radon contribution but includes the uranium contribution. Therefore, compliance with the gross alpha MCL requires subtracting out the alpha particle activity originating from uranium, then comparing the result to 15 pCi/L.

Orange County Water District - Comments

ATTACHMENT 2:
Excerpts from SWRCB draft report "Communities that Rely on Contaminated Groundwater" -- APPENDIX 1

APPENDIX 1 – COMMUNITIES THAT RELY ON CONTAMINATED GROUNDWATER

Excerpt: Table 1.3 (page 31) - Revisions to table entries.

TABLE 1.3: Community PWS that Rely on Contaminated Groundwater as a Primary Source of Drinking Water, by County and Population Served

County	Number of Identified Community Water Systems	Number of Identified Community Water Systems Grouped by Population			Population of Identified Community Water Systems	Population of Identified Community Water Systems per County			Number of Identified Community Water Systems 100% Reliant on Groundwater	Total Population 100% Reliant on Groundwater
		<3,300	3,300-9,999	≥10,000		<3,300	3,300-9,999	≥10,000		
ALAMEDA	1	0	0	1	54,496	0	0	54,496	0	0
AMADOR	2	2	0	0	70	70	0	0	2	70
BUTTE	6	4	1	1	106,848	359	6,403	100,086	6	106,848
CALAVERAS	1	1	0	0	150	150	0	0	0	0
COLUSA	3	3	0	0	1,038	1,038	0	0	3	1,038
CONTRA COSTA	7	5	0	2	108,729	837	0	107,892	5	837
EL DORADO	3	2	0	1	63,104	3,104	0	60,000	3	63,104
FRESNO	31	23	2	6	657,776	8,484	15,251	634,041	28	101,085
GLENN	2	2	0	0	190	190	0	0	2	190
INYO	8	8	0	0	923	923	0	0	8	923
KERN COUNTY	87	63	9	33	771,229	28,501	53,261	689,467	76	428,905
KINGS	12	8	1	3	111,177	7,464	0	103,713	12	111,177
LAKE	3	3	0	0	320	320	0	0	3	320
LASSEN	2	1	0	1	12,450	1,500	0	10,950	2	12,450
LOS ANGELES	89	20	14	55	8,469,248	18,891	104,929	8,345,428	34	911,696
MADERA	30	27	2	1	73,694	8,716	6,800	58,178	26	70,530
MARIN	2	2	0	0	106	106	0	0	1	55
MARIPOSA	2	2	0	0	865	865	0	0	2	865
MENDOCINO	1	1	0	0	1,301	1,301	0	0	1	1,301
MERCED	6	0	2	4	170,603	3,020	9,250	158,333	10	170,603
MONO	1	0	1	0	9,356	1,142	8,214	0	4	1,142
MONTEREY	3	0	0	3	248,247	4,330	6,585	237,332	16	125,755
NAPA	2	2	0	0	225	225	0	0	2	225
NEVADA	3	2	0	1	14,648	348	0	14,300	3	14,648
ORANGE	14	5	0	9	1,254,761	674	5,742	1,248,345	5	674
PLACER	2	2	0	0	170	170	0	0	1	120
PLUMAS	5	5	0	0	3,540	3,540	0	0	5	3,540
RIVERSIDE	36	14	8	14	1,584,611	14,899	24,316	1,545,396	22	283,414
SACRAMENTO	20	12	0	8	767,332	3,093	0	764,239	15	121,276
SAN BENITO	5	5	0	0	418	418	0	0	5	418

Revise to 10. See comments in Appendix 8 page 184.

Revise to 3. See comments on page 184 Appendix 8 to delete 2 listed CWS because gross alpha MCL is not exceeded. See attached DPH data and explanation for gross alpha determination.

Revise to 3

ATTACHMENT 3:
Excerpts from SWRCB draft report "Communities that Rely on Contaminated Groundwater" -- APPENDIX 8

APPENDIX 8 – LIST OF COMMUNITIES THAT RELY ON CONTAMINATED GROUNDWATER AS A SOURCE OF DRINKING WATER

Excerpts: Pages 182, 183 and 184 - revisions to table entries.

Add units or units column for listed analyte (i.e., ug/L, mg/L, etc.)

County	Primary City	Public Water System Name	PWS Num.	Source of PWS Supply	Pop. Served	Comm. Water System Wells	Wells with Princ. Cont.	State Well Number	Princ. Contaminant	MCL	Most Recent Det. >MCL	Det. >MCL (2002-2010)	Max Conc. (2002-2010)	Avg. Conc. (2002-2010)	Sampling Events (2002-2010)
MONTEREY	Prunedale CDP	OAK HEIGHTS W & R CO INC	2700665	100% GW	105	3	1	2700665-003	Nitrate (as NO3)	45	1/15/2008	8	80	39.32	19
								2700665-003	Nitrate + Nitrite	10000	1/15/2008	2	12641	8902.00	4
MONTEREY	Prunedale CDP	PRUNEDALE MWC	2700702	100% GW	252	4	4	2700702-001	Arsenic	10	12/10/2004	2	12	8.02	9
								2700702-002	Arsenic	10	12/28/2009	8	19	15.50	8
								2700702-003	Arsenic	10	12/26/2009	8	62	49.38	8
								2700702-004	Arsenic	10	12/26/2009	7	68	53.71	7
MONTEREY	Prunedale CDP	SAN MIGUEL WS #01	2700738	100% GW	100	2	2	2700738-001	Nitrate (as NO3)	45	9/8/2010	5	59	42.64	11
								2700738-002	Nitrate (as NO3)	45	9/8/2010	4	56	41.30	10
MONTEREY	Prunedale CDP	MORO RD WS #09	2701926	100% GW	210	3	2	2701926-003	Arsenic	10	7/1/2010	8	25	10.32	16
								2701926-002	Nitrate (as NO3)	45	4/1/2010	6	48	45.00	8
NAPA	City of Vacaville	CALISTOGA FARM WORKER CENTER	2800039	100% GW	25	1	1	2800039-001	Arsenic	10	12/1/2010	20	120	88.95	21
NAPA	City of Calistoga	TUCKER ACRES MUTUAL WATER CO.	2800516	100% GW	200	1	1	2800516-002	Arsenic	10	3/31/2009	3	27	13.88	9
NEVADA	City of Truckee	TRUCKEE-DONNER PUD - HIRSCHDALE	2910010	100% GW	48	1	1	2910010-001	Arsenic	10	11/4/2010	37	100	43.24	37
NEVADA	Truckee town	TRUCKEE-DONNER PUD, MAIN	2910003	100% GW	14300	12	3	2910003-005	Arsenic	10	9/9/2009	7	53	17.35	16
				100% GW				2910003-007	Arsenic	10	6/15/2009	2	16	11.20	6
				100% GW				2910003-012	Arsenic	10	4/27/2005	2	13	11.60	3
NEVADA	Kingvale CDP	PLAVADA COMMUNITY ASSOCIATION	2910011	100% GW	300	3	2	2910011-006	Arsenic	10	9/20/2010	12	28.6	16.88	12
								2910011-007	Arsenic	10	9/20/2010	11	41.5	32.68	11
ORANGE	Anaheim city, Fullerton city	CITY OF FULLERTON	3010010	>50% GW Mixed	137367	11	1	3010010-012	Trichloroethylene (TCE)	5	2/3/2004	12	6.7	3.36	67
ORANGE	Costa Mesa city, Fountain Valley city, Santa Ana city	MESA CONSOLIDATED WD	3010004	>50% GW Mixed	108724	6	1	3010004-006	Bromate	10	6/17/2008	2	17	14.00	2

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Delete PWS entry

Treated groundwater - not raw water; laboratory reporting error. PWS has contacted analyzing laboratory. Laboratory will be preparing letter to note reporting error - should be treated water.

Revise to 1 well by deleting the gross alpha reference.

Add units of listed MCL (i.e., PCE = ug/L, perchlorate = ug/L, nitrate as NO3 = mg/L)

	County	Primary City	Public Water System Name	PWS Num.	Source of PWS Supply	Pop. Served	Comm. Water System Wells	Wells with Princ. Cont.	State Well Number	Princ. Contaminant	MCL	Most Recent Det. >MCL	Det. >MCL (2002-2010)	Max Conc. (2002-2010)	Avg. Conc. (2002-2010)	Sampling Events (2002-2010)
2	ORANGE	Garden Grove city, Newport Beach city, Orange city, Placentia city, Santa Ana city, Tustin city	CITY OF SANTA ANA	3010038	>50% GW Mixed	353428	20	1	3010038-019	Nitrate (as NO3)	45	9/17/2003	3	48.05	29.86	106
									3010038-019	Nitrate + Nitrite	10000	7/23/2003	2	10900	6442.94	32
3	ORANGE	Irvine city, Lake Forest city, Orange city, Santa Ana city, Tustin city	IRVINE RANCH WATER DISTRICT	3010092	>50% GW Mixed	316000	27	2	3010092-058	Gross alpha particle activity	15	5/12/2008	2	17.8	11.83	13
									3010092-015	Perchlorate	6	1/14/2010	8	7.9	1.90	37
									3010092-015	Tetrachloroethylene (PCE)	5	2/12/2003	2	5.5	1.49	47
4	ORANGE	North Tustin CDP, Orange city, Tustin city	CITY OF T						3010046-002	Nitrate (as NO3)	45	8/6/2003	2	47.92	35.15	33
									3010046-008	Nitrate (as NO3)	45	5/19/2010	33	76.4	59.92	34
									3010046-009	Nitrate (as NO3)	45	11/17/2010	32	98.04	76.68	32
									3010046-017	Nitrate (as NO3)	45	2/21/2007	6	50.85	34.02	32
									3010046-022	Nitrate (as NO3)	45	11/17/2010	32	80.8	58.99	35
									3010046-002	Nitrate + Nitrite	10000	8/6/2003	2	10800	7942.12	33
									3010046-008	Nitrate + Nitrite	10000	5/19/2010	33	17300	13538.24	34
									3010046-009	Nitrate + Nitrite	10000	11/17/2010	32	22100	17318.75	32
									3010046-017	Nitrate + Nitrite	10000	2/21/2007	6	11500	7686.88	32
									3010046-022	Nitrate + Nitrite	10000	11/17/2010	32	18200	13326.11	35
									3010046-009	Perchlorate	6	11/17/2010	26	10.6	7.10	35
									3010046-022	Perchlorate	6	2/11/2010	13	8	4.40	37
5	ORANGE	West Orange	GOLDEN STATE WC - WEST ORANGE	3010022	Mixed <50%GW	108995	20	1	3010022-022	Perchlorate	6	8/4/2004	5	7.9	5.1294	5
6	ORANGE	Yorba Linda	YORBA LINDA WATER DISTRICT	3010037	Mixed <50%GW	77513	10	1	3010037-001	Arsenic	10	9/1/2010	32	83	11.786	29

Delete gross alpha particle. The MCL not exceeded; see supporting attachment with DPH data and explanation for gross alpha compliance.

The MCL for the nitrate and nitrite is:
Nitrate (as NO3) = 45 mg/L
Nitrate + nitrite (as N) = 10 mg/L
Keep the nitrogen analyte MCLs in same units of measuremtnt for easier review of table and assessment of MCL. Too confusing to list as 10000 (units would be ug/L but missing)

Add units to the MCL column (i.e., mg/L, pCi/L, ug/L, etc.)

County	Primary City	Public Water System Name	PWS Num.	Source of PWS Supply	Pop. Served	Comm. Water System Wells	Wells with Princ. Cont.	State Well Number	Princ. Contaminant	MCL	Most Recent Det. >MCL	Det. >MCL (2002-2010)	Max Conc. (2002-2010)	Avg. Conc. (2002-2010)	Sampling Events (2002-2010)
ORANGE	Yorba Linda	GOLDEN STATE WC - YORBA LINDA	3010070	Mixed <50%GW	5742	2	1	~~3010070-003~~	~~Gross alpha particle activity~~	~~15~~	~~1/25/2010~~	~~17~~	~~26.8~~	~~23.265~~	~~17~~
								3010070-003	Uranium	20	1/25/2010	88	29	23.525	86
								3010070-003	Uranium	30	6/7/2010	114	43	32.537	67
~~ORANGE~~	Fountain Valley city, Newport Beach city	CITY OF NEWPORT BEACH	~~3010023~~	~~Undetermined~~	~~84218~~	~~4~~	~~1~~	~~3010023-005~~	~~Gross alpha particle activity~~	~~15~~	~~2/28/2007~~	~~3~~	~~15.7~~	~~13.25~~	~~14~~
ORANGE	Fullerton city	PAGE AVENUE MUTUAL WATER COMPANY	3000585	100% GW	104	1	1	3000585-001	1,1-Dichloroethylene (1,1-DCE)	6	5/3/2010	3	6.3	3.03	44
								3000585-001	Perchlorate	6	10/1/2007	5	9.1	4.21	35
~~ORANGE~~	Huntington Beach city	LIBERTY PARK WATER ASSOCIATION	~~3000818~~	~~100% GW~~	~~100~~	~~1~~	~~1~~	~~3000818-001~~	~~Gross alpha particle activity~~	~~15~~	~~3/14/2003~~	~~3~~	~~18.7~~	~~13.88~~	~~15~~
ORANGE	Santa Ana city	CATALINA STREET PUMP OWNERS	3000662	100% GW	150	1	1	~~3000662-001~~	~~Gross alpha particle activity~~	~~15~~	~~4/5/2010~~	~~25~~	~~26.8~~	~~23.36~~	~~26~~
								3000662-001	Uranium	20	4/5/2010	24	25.8	21.70	26
ORANGE	Santa Ana city	DIAMOND PARK MUTUAL WATER CO.	3000663	100% GW	200	1	1	3000663-001	Nitrate (as NO3)	45	10/4/2010	19	49.9	39.17	61
								3000663-001	Nitrate + Nitrite	10000	11/1/2010	22	11300	8875.30	62
~~ORANGE~~	~~Stanton city~~	HYNES ESTATES MUTUAL WATER CO.	~~3000519~~	~~100% GW~~	~~120~~	~~2~~	~~1~~	~~3000519-001~~	~~Gross alpha particle activity~~	~~15~~	~~10/5/2009~~	~~7~~	~~17.8~~	~~14.88~~	~~17~~
PLACER		TAHOMA MEADOWS					1	3100033-001	Arsenic	10	10/5/2010	24	246	37.95	19
PLACER							1	3110032-004	Arsenic	10	3/19/2007	2	21	14.333	2
PLUMAS							1	3200510-001	Arsenic	10	2/2/2010	2	12	6.60	6
PLUMAS	CDP, Portola city	CITY OF PORTOLA	3210003	100% GW	2500	4	2	3210003-005	Arsenic	10	7/6/2010	12	31	13.89	20
								3210003-006	Arsenic	10	7/6/2010	6	25	8.27	20
PLUMAS	Delleker CDP	GRIZZLY LAKE RID-DELLEKER	3200104	100% GW	657	3	2	3200104-002	Gross alpha particle activity	15	1/4/2010	8	32	17.45	13
								3200104-003	Gross alpha particle activity	15	4/13/2010	8	39.3	18.75	12
								3200104-002	Uranium	20	7/27/2010	4	36.9	16.64	17

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Delete gross alpha particle as exceeding the MCL for these wells. See supporting attachment with DPH data and explanation for gross alpha compliance determination with the MCL of 15 pCi/L.

10 CWS not 14. See page 31 of report.

See comments on page 183 to revise the Nitrate + nitrite MCL to 10 mg/L not 10000 and without units.

DRAFT revised 02/22/12