



April 26, 2018

The Honorable Blanca Rubio
California State Assembly
State Capitol Building, Room 5175
Sacramento, CA 95814
VIA FAX: 916-319-2148

RE: AB 2528 (Rubio) Stormwater Financial Capabilities Analysis. Notice of Support

Dear Assemblymember Rubio:

The Los Angeles County Division of the League of California Cities® (Division), is pleased to support your AB 2528 to require that the State Water Resources Control Board develop Financial Capability Assessment (FCA) guidelines for cities and counties (permittees) required to comply with the federal Clean Water Act (CWA). AB 2528 also establishes a FCA pilot project through the Los Angeles Regional Water Quality Control Board to assist local governments in setting achievable schedules for water quality objectives in water quality control plans under the Porter-Cologne Water Quality Control Act.

A U.S. Conference of Mayors (USCM) report, *Public Water Costs Per Household: Assessing Financial Impact of EPA Affordability Criteria for California Cities* found that integrated water quality requirements of drinking water, sanitary sewer, flood control, and storm water programs require significant investments which often compete with other public services. The study reviewed over 30 California cities (a majority in Los Angeles County) using EPA's affordability criteria under the Clean Water Act and found that many communities are paying greater than 4.5% of Median Household Income on water costs. This creates what EPA considers a "high burden" on the average household. This study was completed prior to the implementation of the most recent Municipal Separate Storm Sewer System (MS4) permit adopted by the Los Angeles Regional Water Quality Control Board, which is estimated to cost over \$20 billion over the next 20 years, so financial burdens are likely higher.

AB 2523 is timely. The California State Auditor in March published a reportⁱ stating that State and Regional Water Boards, "must do more to ensure that local jurisdictions costs to reduce storm water pollution are necessary and appropriate." AB 2523 helps to capture a snapshot of those costs in our communities.

For these reasons, the Los Angeles County Division supports AB 2538.

Sincerely,

Miguel Canales
President, Los Angeles County Division
League of California Cities®

cc: Los Angeles County Legislative Delegation
Asm. Environmental Safety & Toxic Materials

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ⁱ <http://www.auditor.ca.gov/pdfs/reports/2017-118.pdf>