



April 1, 2019

The Honorable Blanca Rubio
California State Assembly
State Capitol Building, Room 5175
Sacramento, CA 95814

RE: AB 1093 (Rubio) Municipal Separate Storm Sewer Systems:financial capabilities analysis. Notice of Support

Dear Assembly Member Rubio:

The Los Angeles County Division of the League of California Cities® (Division), is pleased to support your AB 1093 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). An FCA does not alter or waive water quality standards, but can be used to assist communities 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.

Last year, the California State Auditor 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 1093 helps to capture a snapshot of those costs in our communities to assist in setting achievable schedules for water quality the Porter-Cologne Water Quality Control Act.

For these reasons, the Los Angeles County Division supports AB 1093. If you have any questions, please contact Kristine Guerrero at kguerrero@cacities.org.

Sincerely,

Juan Garza
President
Los Angeles County Division
League of California Cities®

cc: Los Angeles County Legislative Delegation
Joaquin Pacheco, Office of Assembly Member Blanca Rubio, Joaquin.pacheco@asm.ca.gov

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