



March 29, 2021

The Honorable Susan Rubio
California State Senate
State Capitol Building, Room 5035
Sacramento, CA 95814

**RE: SB 426 (Rubio) Municipal Separate Storm Sewer Systems:
Financial Capability Analysis. Notice of SUPPORT (As Amended 3/1/21)**

Dear Senator Rubio,

The Los Angeles County Division of the League of California Cities (Division), representing 86 cities in the county, is pleased to **support your SB 426 (Rubio)**, which would require the State Water Resources Control Board to adopt Financial Capability Assessment (FCA) guidelines for Municipal Separate Storm Sewer System (MS4) permittees that consider the costs to local jurisdictions.

A U.S. Conference of Mayors 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 US Environmental Protection Agency's (EPA) affordability criteria under the Clean Water Act and found that many communities are paying more than 4.5 percent of Medium Household Income on water costs. This creates what EPA considers a substantial economic burden on the average household. This study was completed prior to the implementation of the most recent MS4 permits used by the Los Angeles Regional Water Quality Board, which have some of the strongest water quality guidelines in the county. As such, the financial burdens are likely higher.

By creating FCA's, SB 426 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. For these reasons, the Division **supports SB 426**.

Sincerely,

Blanca Pacheco
President
Los Angeles County Division
League of California Cities

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