



May 17, 2021

The Honorable Eduardo Garcia
California State Assembly
State Capitol Building, Room 4140
Sacramento, CA 95814

Dear Assemblymember Garcia:

Subject: Support for AB588 Planned Regulatory Compliance

The San Gabriel Valley Water Association ('SGVWA' or 'The Association') thanks you for introducing AB588 that, if enacted, will provide water systems three years or more to implement plans to comply with new safe drinking water standards. Furthermore, AB588 will require that the State Water Resources Control Board (SWRCB) consider the funding needs of small and disadvantaged communities which may not be able to immediately afford treatment systems to comply with a new drinking water standard.

The San Gabriel Valley Water Association's 60 members provide drinking water to 2 million residents in 31 cities through special districts, municipal utilities, investor-owned utilities, and not for profit mutual water companies which serve several disadvantaged communities. These two provisions in AB588 will provide more protections for these financially vulnerable systems and help stop the current "race to the bottom" triggered by the implementation of new drinking water standards when some communities can not afford the treatment systems available to larger and wealthier communities.

AB588 includes provisions requiring that water systems report progress in meeting new drinking water standards during the "planned compliance period." This is important in encouraging consumer confidence and in keeping water systems accountable for safeguarding against long-term health threats. AB588 provides the methodology, safeguards, and time allowing larger water systems to create economies of scale that make treatment methods more affordable for smaller water systems.

Building new water treatment systems to comply with new drinking water standards requires planning, financing, community engagement, and construction. Currently, when a small water system can't immediately comply upon adoption of a new drinking water standard, state regulators may issue a notice of violation (NOV). The NOV creates a "race to the bottom" when the acquisition of loans becomes difficult because the impacted source of water can't be pledged for sale to pay the debt of building the treatment system, during the planning, entitlement, and construction stages. Furthermore, with state grant programs taking years to result in actual fund deliverance, using outside financing to bridge the time lag and build a project is impossible once an NOV has been issued. AB588 goes a long way in averting the current regulatory framework that traps small water systems in non-compliance and risk of failure.

AB588 allows all water systems to methodically comply with new standards for contaminants that have been assessed to present *long-term* health threats. Such standards are the result of advances in technology that allow for the detection of ever smaller molecular-level traces of contaminants. The corresponding treatment technologies to meet such standards at their inception are also increasingly expensive and cutting edge; making their usage difficult for underprivileged water systems. The planned approach to compliance provided in

AB588 will go a long way in making sure that small water systems and those serving disadvantaged communities are not left hopelessly behind in complying with new standards.

If enacted, AB588 will help all water systems find an equitable path towards compliance with new drinking water standards, while providing the SWRCB and DDW the flexibility to implement them in measure with their urgency.

Sincerely yours,

Greg Galindo
President
San Gabriel Valley Water Association