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ACHIEVING RESULTS.**

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Sent via ELECTRONIC MAIL to commentletters@waterboards.ca.gov

August 29, 2025

Courtney Tyler, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter – 2025 Draft Safe Drinking Water Plan

Dear State Water Board Members and Staff,

On behalf of the California Water Association (CWA), thank you for the opportunity to provide input on the 2025 Draft *Safe Drinking Water Plan*. CWA and its 94 member water utilities, regulated by the California Public Utilities Commission (CPUC), collectively serve approximately 6 million Californians with safe, high-quality, and reliable water. We applaud the continued efforts by the State Water Board to advance the human right to water, which is reflected in the 2025 Draft Plan.

Below, please find our comments and recommendations:

1. Applauding Inclusion of SAFER and Affordability Data

CWA commends the State Water Board for the integration of statistical data in the 2025 Draft Plan, particularly around the SAFER program's progress and the affordability challenges faced by small systems. The inclusion of metrics quantifying affordability burdens and tracking reductions in the number of Californians without access to safe drinking water (from 1.6 million in 2019 to 750,000 in 2024) is an encouraging indicator of progress.

These updates demonstrate the effectiveness of SAFER and should bolster confidence in the program's ability to deliver outcomes when accompanied by reliable funding and community engagement.

2. Elevating the Importance of Affordability Assessments and Consolidation

CWA strongly supports the Plan's focus on affordability assessments and urges the Board to further elevate the role of affordability data in regulatory and planning decisions.

The Plan rightly highlights that small water systems are disproportionately impacted by affordability challenges, largely due to their lack of economies of scale. For example, customers of small systems pay an average of \$74/month for 6 HCF of water, compared to \$42/month for customers of large systems. This disparity reflects the structural limitations of small systems, which

often have aging infrastructure, limited staffing, and inadequate rate bases to support needed upgrades.

Moreover, the Plan notes that 84% of water systems at risk of failure have 3,000 or fewer connections — a clear indicator that small systems are both more expensive for customers and more likely to be noncompliant with drinking water standards. This reinforces the need for aggressive action on consolidation, not only as a compliance tool but as a sustainability strategy. We recommend that the State Water Board expand and prioritize regionalization and targeted technical and financial support for voluntary and mandatory consolidations.



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It is important to recognize that the cost of water service cannot be fully captured by the monthly water bill alone. Many municipal water providers supplement revenue through additional sources such as local sales taxes or property tax assessments. As a result, analyses that rely solely on bill comparisons may overlook a portion of the actual costs of providing water service. Consequently, affordability studies based only on water bills may not reflect the full financial burden associated with maintaining and operating water systems. To address this gap, the State Water Board should consider incorporating additional data points in the Electronic Annual Report (eAR) that capture these broader sources of revenue. Doing so would enable affordability assessments to more accurately and comprehensively reflect the full cost of water service.

3. Emphasizing Wildfire and Climate Resilience Funding

CWA urges the State Water Board to place greater emphasis on wildfire-related climate impacts and the need for dedicated funding for infrastructure resilience and emergency response. The Plan appropriately references climate stressors, but it should more explicitly outline how wildfire-prone utilities can access funds to:

- Harden infrastructure (e.g., burying lines, backup power, remote sensing),
- Maintain emergency water quality sampling capacity post-wildfire,
- Implement long-term recovery planning, and
- Secure emergency response resources (e.g., mobile treatment, trucking).

The Plan should also identify strategies to ensure water quality in post-disaster environments, particularly where wildfire-contaminated service lines may leach chemicals like benzene. CWA recommends developing a dedicated funding stream for fire-prone and climate-vulnerable regions to invest in risk-reduction and recovery capacity.

4. Planning for Success in an Era of Fiscal Uncertainty

While we celebrate the success of the State Water Board over the last five years, we caution that continued progress depends on financial sustainability. The Plan correctly warns of the expiration of SAFER's funding authority in 2030, but the threats extend further. Current proposals at the federal level to reduce or eliminate the Drinking Water State Revolving Fund (DWSRF), WaterSMART grants, and other essential programs put California's progress at risk.

In light of these challenges, CWA strongly recommends that the Plan include a new section outlining how California can achieve its drinking water goals under limited funding scenarios. This should include:

- Exploring state-level investment strategies beyond SAFER;
- Encouraging interagency coordination for infrastructure finance;
- Leveraging public-private partnerships;
- And examining best practices from other states.



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5. Learning from Other States

CWA urges the State Water Board to review the strategic plans of Washington, Michigan, and Texas, which all include state-led investment mechanisms beyond federal funding:

- **Washington** provides state-funded drought relief and infrastructure planning grants, including specific provisions for small system viability and data modernization.
- **Michigan** has allocated General Fund revenues for lead service line replacement and created the MI Clean Water Plan, a \$500 million package for infrastructure and source protection.
- **Texas** established the State Water Implementation Fund for Texas (SWIFT), using Rainy Day Fund transfers and state bond authority to finance long-term water projects at reduced interest.

These models highlight how states are stepping up to meet drinking water needs where federal support falls short. We urge the State Water Board to share these examples with the Governor's Office and the State Legislature as models for financing safe drinking water.

Closing

The 2025 Draft *Safe Drinking Water Plan* reflects thoughtful analysis and strong progress, and we appreciate the opportunity to contribute to its refinement. CWA looks forward to continued partnership with the State Water Board in advancing equitable, resilient, and affordable drinking water for all Californians.

If you have any questions or would like further input, please do not hesitate to contact me at (415) 561-9650.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer M. Capitolo".

Jennifer Capitolo
Executive Director
California Water Association

cc:

The Honorable Joaquin Esquivel, Chair, State Water Resources Control Board
 The Honorable Dorene D'Adamo, Vice Chair, State Water Resources Control Board
 The Honorable Laurel Firestone, State Water Resources Control Board
 The Honorable Sean Maguire, State Water Resources Control Board
 The Honorable Nichole Morgan, State Water Resources Control Board
 Eric Oppenheimer, Executive Director, State Water Resources Control Board
 Terence Shia, Director, Water Division, CA Public Utilities Commission