



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: ACWA Comment Letter regarding 2025 Safe Drinking Water Plan

Dear Ms. Tyler:

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the 2025 Safe Drinking Water Plan (Plan). ACWA represents around 470 local public water agencies that supply water for domestic, agricultural, and industrial uses to over **90 percent of California's population**. Our members collectively are entrusted with the responsibility of supplying the public with safe and reliable drinking water. Ensuring the safety of these supplies by meeting or exceeding all relevant state and federal standards is the highest priority of public water systems (PWS). We offer the following comments on the Plan:

1. Consider affordability and cost capacity for water agencies in DDW goals.

ACWA **appreciates the Plan's acknowledgement of** affordability issues for PWS and encourages further consideration of affordability and cost capacity for water systems in future Division of Drinking Water (DDW) goals. The cost of water continues to increase while DDW annually proposes ambitious drinking water standards that have real world costs. The Plan states, **"Between 2019 and 2022 the average cost of drinking water increased by over 60 percent across water systems of all sizes."** The gap in needed investment to upgrade necessary infrastructure repairs and upgrades has been discussed by PWS for many years in both the State Legislature and in State Water Board proceedings, but remains a challenge that needs to be addressed. PWS continually must look forward to address and finance actions to meet the growing number of new requirements and regulations in the state.

We encourage further state funding consideration for PWS to address much needed infrastructure and treatment system upgrades to **comply with California's ambitious drinking water standards** and the economic reality of funding shortages that challenge PWS to comply with future drinking water standards.

2. Consider federal uncertainties in future funding forecasts.

ACWA requests that consideration also be given to the uncertainty California faces in receiving federal funding in the near future. The Plan makes numerous references to funding received from 2020-25 as compared to 2015-20¹. Uncertainty remains about State Revolving Fund (SRF) funding levels in 2026 and moving forward. The current administration and the House of Representatives have proposed significant cuts to SRF in 2026, and it remains to be seen how SRF will fair in the federal budget pending **Congress' return in September to continue budget negotiations.**

We suggest that the Plan reflect the latest information reflecting the federal budget allocation for SRF to ensure a realistic picture of what federal funding be expected to most accurately forecast what the state must do to sustain funding sources for PWS.

3. Appreciate emphasis on TMF and Voluntary Consolidation.

ACWA appreciates the Plan focus on developing strategies to address technical, managerial, and financial (TMF)² and Voluntary Consolidation³ as components of meeting the State **Water Board's** goals. TMF capacity is a key component to improve smaller PWS operations and compliance **with California's ambitious drinking water standards**. The efforts to identify and assist voluntary consolidation of failing PWS that have problems or repeated violations has been a good step forward to transition into larger PWS with the needed infrastructure to absorb additional systems and meet drinking water standards.

We encourage continued efforts to identify and assist small water systems that have continued problems or repeated violations.

¹ 2020-25 Federal Funding has been more substantial than 2015-20 Federal Funding was due to programs like the Bipartisan Infrastructure Law; which will expire on September 30, 2026 if not re-authorized by Congress.

² Complete TMF data is necessary to conduct an adequate risk indicator analysis for small and medium sized water systems.

³ Voluntary Consolidation **of a "failing" system and a healthy system that has the capacity to receive the "failing" system, without reducing the receiving system's ability to provide safe drinking water**, should be the priority when consolidation is considered. When consolidation is the best option, voluntary consolidation of a **"failing" system and a healthy system that has the capacity to receive the "failing" system without reducing the receiving system's ability to provide safe drinking water** should be the priority.

4. Encourage optimized approach to keep wells online to meet customer needs.

ACWA encourages continued effort to optimize DDW's permitting process across state offices statewide. We suggest that when past permit examples of approved technology and treatment processes exist, future permit applications using successful past examples should be streamlined if they are identical to projects that have already been approved by DDW elsewhere in the state. It is important to continue to seek ways to sustain communication between local DDW offices and PWS to create efficiencies for PWS water sources seeking to remain in compliance serving water, controlling operational costs, and sustaining public trust in PWS.

We encourage continued dialogue between local DDW offices and PWS to continue to build on efficiencies like past examples of successful PWS permit requests resulting in safe drinking water for communities and bringing local water sources back online to avoid additional costs resulting from additional imported water.

Conclusion

Thank you for considering our comments on the Plan. We look forward to future conversations with the State Water Board. If you have any questions regarding these comments, please contact us at NickB@acwa.com or (916) 669-2377.

Sincerely,



Nick Blair
Senior Policy Advocate

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
Mr. Eric Oppenheimer, Executive Director, State Water Resources Control Board
Mr. Marwan Khalifa, Interim Executive Director, Association of California Water Agencies
Ms. Cindy Tuck, Deputy Executive Director for Government Relations, Association of California Water Agencies