



The Canyon City — Gateway to the American Dream

March 4, 2021

The Honorable Chair Ben Allen  
Senate Standing Committee on Environmental Quality  
State Capitol, Room 2205  
Sacramento, CA 95814

**RE: SB 426 (Rubio) — SUPPORT**

Dear Chair Allen:

On behalf of the City of Azusa, we are proud to support Senate Bill 426, which will provide assistance to cities and counties as they seek to comply with the federal Clean Water Act (CWA) by requiring the State Water Resources Control Board to establish Financial Capability Assessment (FCA) guidelines for municipal separate storm sewer system (MS4) permittees that are adequate and consistent when considering the costs to local jurisdictions, by July 1, 2022.

The Environmental Protection Agency (EPA) adopted FCA factors in 1997 and updated them in 2014, to assess community water quality compliance costs, the burden on individual households, and to help find the most cost-effective ways to meet CWA objectives. FCA guidelines established a process to assist regulators and permittees in prioritizing water quality improvements and schedules for compliance while taking communities' financial capabilities into careful consideration. Although the FCA process is in place for several states, California manages its water quality through the Porter-Cologne Act (1969) and is therefore not subject to FCA guidelines.

Southern California cities have some of the most expensive MS4 compliance costs. Given that most cities are struggling financially due to the COVID-19 pandemic, and do not have a dedicated revenue source for stormwater management, these costs compete with other essential public services provided by local governments' general fund, including law enforcement, fire and paramedics, traffic and transportation infrastructure, and others.

SB 426 is a timely bill that does not compromise water quality standards, instead it establishes sustainable compliance options for MS4 permittees.

For these reasons, the City of Azusa is proud to support SB 426 and respectfully requests an "AYE" vote.

Sincerely,

Sergio Gonzalez  
City Manager

CC: Senate Committee on Environmental Quality Members  
Senator Susan Rubio