

September 21, 2026

Submitted via: commentletters@waterboards.ca.gov

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

Re: Review of State Plans and Policies

Dear State Water Resources Control Board,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments on the State Water Resources Control Board's (State Water Board) Review of State Water Quality Control Plans and State Policies for Water Quality Control (Review). ACWA represents approximately 470 public water agencies that collectively deliver approximately 90 percent of the water in California for domestic, agricultural, and industrial uses.

ACWA recognizes the important role of the State Water Board's water quality control plans and policies in protecting water quality and public health throughout California. These plans and policies can have significant implications for public water agencies, including how they manage water supplies, operate facilities, and plan and invest in infrastructure, and manage costs ultimately borne by their ratepayers. The priorities identified through this Review will help shape the State Water Board's water quality policy and regulatory work in the coming years, with potential implications for public water agencies throughout California. As the State Water Board advances the priorities identified through this Review, the processes used to develop and implement individual plans, policies, and regulatory actions will be critical to achieving effective and durable outcomes. ACWA respectfully offers the following comments for consideration.

1. Ensure early and meaningful engagement with affected water agencies and stakeholders.

As the State Water Board advances the priorities identified in the Review, ACWA encourages early and meaningful engagement with affected water agencies and stakeholders. Engagement should occur early enough to inform the development and evaluation of potential policy approaches, including consideration of technical and operational expertise, implementation challenges, and cost impacts.

Proactive outreach and ongoing engagement throughout policy development will help ensure resulting policies are effective, practical, and implementable.

2. Build on existing regional and local data and expertise.

The State Water Board should build on existing data, monitoring, and management efforts, and expertise developed by local water agencies and regional entities when developing statewide policies and objectives. Water agencies have extensive knowledge of the conditions affecting

their watersheds, reservoirs, and communities, as well as experience implementing programs tailored to those circumstances. For example, before establishing statewide mandatory objectives, such as including potential water quality objectives for Harmful Algal Blooms and cyanotoxins, the State Water Board should evaluate region-specific challenges and identify opportunities to improve the effectiveness of regional nutrient reduction strategies.

Statewide approaches should recognize and build upon these existing efforts and provide sufficient flexibility to account for regional conditions and solutions, supporting both water quality and water supply benefits while avoiding unnecessary duplication and costs.

3. Evaluate scientific, technical, and implementation feasibility.

As the State Water Board develops new or revised water quality objectives or other enforceable compliance metric, ACWA encourages early consideration of the scientific, technical, and practical feasibility of implementation. Policies and requirements should be supported by a clear scientific basis and a feasible framework for implementation, including reliable and appropriately accredited analytical methods, method sensitivity requirements, as well as consideration of sampling requirements, laboratory capacity, implementation timelines, and other practical considerations. For example, the current lack of an ELAP-certified method available for 2,6-dichlorophenol illustrates the types of implementation considerations that should be addressed as potential requirements are developed. Early and meaningful engagement with affected water agencies can assist with identifying a comprehensive, science-based approach will help ensure that requirements are both protective and workable in practice.

4. Consider flexible and achievable compliance pathways.

ACWA encourages the State Water Board to consider flexible and alternative implementation and compliance pathways that account for regional conditions, available resources, and cost-effectiveness. If a statewide water quality objective is established, there should be consideration of a combination of phased reductions, source-control measures, and adaptive management to meet successful compliance. Additionally, adequate ramp-up time should be afforded to a local agency or permittee to comply as it may require infrastructure changes and appropriately informing the public about a potential health hazard.

ACWA stands ready to collaborate with the State Water Board on its implementation of the projects and plans identified in the Review of State Plans and Policies over the coming years and appreciates the opportunity to provide input on this effort. Please do not hesitate to contact me at amberr@acwa.com or (916) 669-2434 if you have any questions regarding ACWA's input.

Sincerely,



Amber Rossow
State Relations Advocate

CC: The Honorable E. Joaquin Esquivel, Chair, State Water Resources Control Board
 The Honorable Dorene D'Adamo, Vice Chair, State Water Resources Control Board
 The Honorable Jared Blumenfeld, Member, State Water Resources Control Board
 The Honorable Sean Maguire, Member, State Water Resources Control Board
 The Honorable Nichole Morgan, Member, State Water Resources Control Board
 Mr. Eric Oppenheimer, Executive Director, State Water Resources Control Board
 Ms. Karla Nemeth, Interim Executive Director, Association of California Water Agencies
 Ms. Chelsea Haines, State Regulatory Relations Director, Association of California Water Agencies