



March 10, 2025

Honorable Jesse Gabriel
California State Assembly
P.O. Box 942849
Sacramento, CA 94249

RE: AB 794: California Safe Drinking Water Act: Emergency Regulations - **OPPOSE**

Dear Assembly Member Gabriel:

The Orange County Water District (OCWD) writes to express our opposition to AB 794 California Safe Drinking Water Act: Emergency Regulations. AB 794 would direct the State Water Board to adopt an emergency regulation for per-and polyfluoroalkyl substances (PFAS) in drinking water; however, the bill would skip important steps in California's regulatory process and would cause large and unnecessary costs to water ratepayers. Upon January 1, 2026, AB 794 would shut down at least 20 additional groundwater wells in the OCWD service area, thereby forcing local public water systems to spend an additional \$75 million for costly replacement imported surface water.

OCWD manages the Orange County Groundwater Basin that provides up to 85% of the drinking water to 2.5 million people (500,000 in disadvantaged communities). More than half of the 200 drinking water wells in our service area are impacted by PFAS. Despite playing no role in releasing PFAS into the environment, OCWD is successfully working with its local cities and other retail water agency partners to remove PFAS from the local groundwater supply to become compliant with final United States Environmental Protection Agency (USEPA) federal PFAS drinking water regulations adopted in 2024.

OCWD swiftly launched the nation's largest PFAS treatment pilot project in 2019 to identify the most effective treatment methods. Since then, it has constructed 27 PFAS treatment plants, including the largest in the country. To date, 45 wells have been restored to service, with 53 expected by April 2025. To support this extensive effort, OCWD has had to increase water rates by more than 10% annually for the past three years, with further increases on the horizon.

AB 794 would impose an unworkable deadline by accelerating PFAS compliance to January 1, 2026, bypassing critical regulatory steps such as a Cost-Benefit Analysis and a Statement of Reasons. These steps are especially crucial if state regulators opt for stricter standards than those initially evaluated and adopted by the USEPA. Acknowledging both the public health risks of PFAS exposure and the significant time and resources required for water systems to implement treatment, the USEPA under the previous administration deliberately included a five-year compliance period in its April 2024 final drinking water regulation.

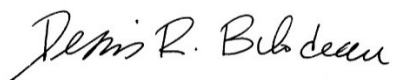
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Unnecessarily accelerating the compliance deadline by three years would force the shutdown of at least 20 wells in our service area before treatment is completed, resulting in an additional \$25 million per year in imported water costs for local ratepayers. This is on top of the \$280 million OCWD has already invested in PFAS treatment systems, with total projected costs reaching \$1.8 billion over the next 30 years, including capital, operations, and maintenance. In contrast, California's current PFAS regulatory process aligns with the USEPA's 2029 compliance deadline—a timeline OCWD has planned for and is actively working toward in collaboration with local cities and retail water agencies.

For the above reasons, OCWD opposes AB 794. Please contact me or Alicia Harasty, Legislative Affairs Liaison on aharasty@ocwd.com or 714-477-3750.

Sincerely,

Denis R. Bilodeau, P.E.



President

cc:

Senator Kelly Seyarto, 32nd District
Senator Tom Umberg, 34th District
Senator Tony Strickland, 36th District
Senator Steven Choi, 37th District
Assembly Member Phillip Chen, 59th District
Assembly Member Sharon Quirk-Silva, 67th District
Assembly Member Avelino Valencia, 68th District
Assembly Member Tri Ta, 70th District
Assembly Member Diane Dixon, 72nd District
Assembly Member Cottie Petrie-Norris, 73rd District