



Las Virgenes – Triunfo Joint Powers Authority
4232 Las Virgenes Road, Calabasas, CA 91302
818.251.2100



March 24, 2022

The Honorable Bill Quirk, Chair
Assembly Environmental Safety and Toxic Materials Committee
Legislative Office Building, Room 171
Sacramento, California 95814

Subject: AB 2247 (Bloom): Support

Dear Chairman Quirk:

The Las Virgenes – Triunfo Joint Powers Authority (JPA) has a support position on AB 2247 (Bloom), which would require manufacturers of PFAS or products containing PFAS to disclose the presence of PFAS in those products in a publicly accessible database. This is important and necessary information that will inform state and local decision making regarding the management of PFAS in our watersheds and the environment.

The JPA was formed in 1964 and consists of a partnership between Las Virgenes Municipal Water District and Triunfo Water and Sanitation District. The JPA provides wastewater treatment, recycled water service and biosolids composting for residents and businesses in Agoura Hills, Calabasas, Hidden Hills, North Ranch, Oak Park, portions of Thousand Oaks, Westlake Village, and surrounding unincorporated areas of eastern Ventura and western Los Angeles Counties.

Per- and Polyfluoroalkyl substance (PFAS) have recently become a topic of public concern, due to their high mobility and resistance to breaking down naturally in the environment, as well as the persistent detection of PFAS compounds in people's bodies. The State is comprehensively investigating levels of PFAS in our environment, with a particular focus on water and wastewater resources. While significant progress is being made towards identifying pathways of PFAS in our water and sewersheds, additional information is needed for agencies to be able to make efficient management decisions: local water and wastewater agencies need to know what exactly they are looking for in order to implement effective source reduction policies to limit PFAS inputs into our systems. AB 2247 would allow us to use the PFAS disclosure data required from manufacturers of PFAS or products containing PFAS to optimize pollution prevention programs at the local level through our local pre-treatment programs, and this information would generate consumer awareness about the chemicals used in everyday products and how they impact the environment. We need data to support practical and cost-effective management solutions, and AB 2247 is an important first step towards this end goal.

It's important to note that PFAS chemicals are both ubiquitous and indestructible. Without better information about sources of PFAS to support source control, local water management options are limited and costly, leading to affordability concerns for the

Jay Lewitt
Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Leon E. Shapiro
Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Water & Sanitation District
Board of Directors

March 24, 2022
The Honorable Bill Quirk, Chair
p. 2 of 2

delivery of essential public services. In some cases, PFAS can be removed from water and wastewater at the end of the cycle through advanced treatment technology. However, there is no technologically feasible method for the large-scale destruction of PFAS compounds. Instead, once removed, PFAS residuals are merely displaced and transferred to another waste stream and typically cycle back through the waste management process.

For these reasons the JPA supports AB 2247 and urges your "aye" vote when it is heard in the Assembly Environmental Safety and Toxic Materials Committee.

Sincerely,



Joe McDermott
Director of Engineering and External Affairs

CC:

The Honorable Richard Bloom, Assemblymember
P.O. Box 942849
Sacramento, CA 94249-0050

The Honorable Jesse Gabriel, Assemblymember
P.O. Box 942849
Sacramento, CA 94249-0045

[Jessica Gauger](mailto:jgauger@casaweb.org), California Association of Sanitation Agencies
jgauger@casaweb.org



Las Virgenes – Triunfo Joint Powers Authority
4232 Las Virgenes Road, Calabasas, CA 91302
818.251.2100



March 29, 2022

The Honorable Bill Quirk, Chair
Assembly Environmental Safety and Toxic Materials Committee
Legislative Office Building, Room 171
Sacramento, CA 95814

RE: AB 2811 (Bennett)—OPPOSE UNLESS AMENDED

Dear Assemblymember Quirk:

On behalf of the Las Virgenes – Triunfo Joint Powers Authority (JPA), we regretfully inform you that we must oppose AB 2811 (Bennett) unless the portion of the bill addressing onsite reuse is amended.

The JPA was formed in 1964 and consists of a partnership between Las Virgenes Municipal Water District and Triunfo Water and Sanitation District. The JPA provides wastewater treatment, recycled water service and biosolids composting for residents and businesses in Agoura Hills, Calabasas, Hidden Hills, North Ranch, Oak Park, portions of Thousand Oaks, Westlake Village, and surrounding unincorporated areas of eastern Ventura and western Los Angeles Counties.

The JPA is currently in the planning and design phase of the Pure Water Project Las Virgenes – Triunfo, which is a \$256 million **centralized water reuse project** that will serve our community by advance treating wastewater from our reclamation facility to drinking water standards. When completed, **the JPA will be beneficially reusing 100 percent of all water that is used indoors – both commercial and residential**. At this time, we are in the process of identifying and securing other sources of water, including but not limited to impaired groundwater basins and urban runoff, that can augment supplies from our wastewater reclamation facility in order to maximize the use of this new asset. **Requiring commercial properties to reuse water on an individual basis is not necessary or economical** in our case, nor will it be for other agencies that pursue large-scale water reuse projects. At a minimum, AB 2811 should be amended to account for this situation.

Local agencies such as ours need to plan years in advance to develop a potable reuse project or other recycled water projects. The mandate in AB 2811 will siphon off wastewater in communities and make this planning process unmanageable.

For these reasons we ask that you revise or remove the onsite reuse portion of AB 2811 or provide an exception for this situation.

Sincerely,

A handwritten signature in cursive script that reads "Joe McDermott".

Joe McDermott
Director of Engineering and External Affairs

Jay Lewitt
Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Leon E. Shapiro
Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Water & Sanitation District
Board of Directors

March 29, 2022

The Honorable Bill Quirk, Chair

P. 2 of 2

cc: Asm. Thurston Smith, Vice Chair, Assm Environmental Safety & Toxic Materials Comm
Members, Assembly Environmental Safety & Toxic Materials Committee
Josh Tooker, Chief Consultant, Assembly Environmental Safety & Toxic Materials Comm.
Gregory Melkonian, Republican Consultant
Asm. Steve Bennett

Jay Lewitt

Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Leon E. Shapiro

Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Water & Sanitation District
Board of Directors



Las Virgenes – Triunfo Joint Powers Authority
4232 Las Virgenes Road, Calabasas, CA 91302
818.251.2100



March 30, 2022

The Honorable Henry Stern
Chair, Senate Natural Resources and Water Committee
1021 O Street, Room 2100
Sacramento, CA 95814

RE: SB 1157 (Hertzberg) - Oppose Unless Amended

Dear Senator Stern:

The Las Virgenes – Triunfo Joint Powers Authority (JPA) supported moving California to objective water use budgets and indoor water use efficiency standards in 2018 through support of SB 606 (Hertzberg) and AB 1668 (Friedman). Those bills called for the Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) to conduct a study to determine if the water use efficiency standards should be changed, and required the study to analyze the impacts, including adverse impacts, of changing the standards. DWR did produce a study late last year, but numerous comments were made by stakeholders that it did not consider adverse impacts of implementing those standards, in particular the recommended standard of 42 gallons per person (or per capita) per day (GPCD) by 2030. SB 1157 now seeks to put DWR's recommendations into statute, including the 2030 standard.

The JPA was formed in 1964 and consists of a partnership between Las Virgenes Municipal Water District and Triunfo Water and Sanitation District. The JPA provides wastewater treatment, recycled water service and biosolids composting for residents and businesses in Agoura Hills, Calabasas, Hidden Hills, North Ranch, Oak Park, portions of Thousand Oaks, Westlake Village, and surrounding unincorporated areas of eastern Ventura and western Los Angeles Counties.

While the JPA supports making continual gains in water conservation, it must respectfully oppose putting 42 GPCD in statute, as called for by SB 1157, without an appropriate analysis behind it. The JPA's concerns are twofold. First is that the cost to implement the proposed 2030 standard is entirely unknown and may very well be cost prohibitive in comparison to the water savings. Our second concern relates to the ambitious recycling project currently being pursued by the JPA. The Pure Water Project Las Virgenes-Triunfo, a potable reuse project, once fully implemented, will recycle 100% of the JPA's waste water to provide both water flows to Malibu Creek as required by our discharge permit to sustain fish populations and riparian habitat, and to supplement our shrinking drinking water supply. For the JPA to achieve the 2030 indoor water use efficiency standard proposed in SB 1157, our recycling efforts, and the unique demands on us to provide minimum flows in Malibu Creek, must be accounted for beyond what is allowed for in current law, but SB 1157 makes no attempt to amend other sections of the 2018 legislation that bear directly on the indoor water use calculation. It is exactly this kind of analysis and consideration that needs to be performed before putting such an aggressive indoor water use standard into statute.

Jay Lewitt

Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Leon E. Shapiro

Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Water & Sanitation District
Board of Directors

March 30, 2022
The Honorable Henry Stern
P. 2 of 2

DWR, SWRCB, and the Legislature, have several years to properly analyze the impacts of an indoor water use efficiency standard that will not take effect until 2030. Rushing to enshrine in statute a water conservation standard that is unsupported by facts and will impact expensive recycling projects that are already in progress is unsound water policy and unnecessary at this time. We respectfully ask that SB 1157 be amended to delete the 2030 standard and implement the study originally called for in 2018 that will accurately assess the adverse impacts of going to a lower water use efficiency standard. The JPA, in particular, requests that the study of adverse impacts include impacts to recycling projects that are already underway.

Thank you for your consideration of our concerns.

Sincerely,



Joe McDermott
Director of Engineering and External Affairs

CC: Senator Hertzberg

Jay Lewitt
Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Leon E. Shapiro
Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Water & Sanitation District
Board of Directors