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**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

April 12, 2021

The Honorable Eduardo Garcia  
Chair, Assembly Committee on Water, Parks & Wildlife  
State Capitol, Room 4140  
Sacramento, CA 95814

RE: AB 1434 (Friedman) Urban water use objectives: indoor residential water use -  
Oppose

Dear Chair Garcia:

On behalf of Orange County Water District (OCWD) and the 13 cities, five retail water districts, and one investor owned water utility that we serve (which include Anaheim, Buena Park, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Palma, Newport Beach, Orange, Santa Ana, Seal Beach, Tustin, Westminster, East Orange County Water District, Irvine Ranch Water District, Mesa Water District, Serrano Water District, Yorba Linda Water District, and Golden State Water Company), we are writing in opposition to AB 1434 (Friedman), which would arbitrarily change the indoor water use standards established by AB 1668 (Friedman, 2018). This bill proposes to incrementally lower the indoor water use standards to 40 gallons per capita daily (GPCD) starting in 2030. OCWD is not aware of any study or analysis supporting these new amounts.

Further the bill removes the requirement for the Department of Water Resources (DWR), in consultation with the State Water Resources Control Board (State Board), to submit a report (DWR Report) on the result of its indoor water use studies and make recommendations regarding the existing standards. This would omit a necessary study needed to determine if flows to sewer systems are sufficient.

A lowering of the indoor residential water use standard to 40 GPCD may have a significant impact to not only sewer systems and treatment but also to recycled water supplies throughout the state. Regions in the state that have proactively worked to recycle their wastewater could now be penalized. OCWD rate payers have invested over \$900 million in the Groundwater Replenishment System which allows us to recycle and reuse most of the wastewater being received by the Orange County Sanitation District. These new potential standards could reduce the flows needed to fully operate this system.

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AB 1668 and SB 606 (Hertzberg, 2018) were a package of bills that implemented new water use efficiency standards, of which one part is the indoor water use standard this bill proposes to change. The provisions in these two bills were closely negotiated by stakeholders in the water community as well as members of the Legislature and environmental community. An important component of those negotiations was the requirement for DWR to conduct studies to identify a standard for indoor residential water use that reflects best practices.

The DWR Report was due January 1, 2021 but has not yet been made public. It is anticipated, based on the existing statutory requirements, that any forthcoming report or set of recommendations would be in draft form, because it is required by law to be finalized in collaboration with and input from stakeholders. Stakeholders have not yet seen draft study results or recommendations from DWR or the State Board.

The new indoor use standards in this bill are not based on robust findings and an analysis of the benefits and impacts of how the changing standard will impact water and wastewater management, including potable water use, wastewater, recycling and reuse systems, infrastructure, operations, and supplies.

For these reasons, we oppose this bill and respectfully requests your “No” vote when it is heard in the Assembly Committee on Water, Parks & Wildlife. Please do not hesitate to contact me or OCWD Legislative Liaison Alicia Dunkin at [adunkin@ocwd.com](mailto:adunkin@ocwd.com) or (714) 477-3750 if you have any questions and/or if we may be of any assistance on water policy issues in the coming year.

Sincerely,



Michael R. Markus, P.E., D.WRE  
General Manager

cc:

Senator Dave Min, 37<sup>th</sup> District  
Senator Patricia Bates, 36<sup>th</sup> District  
Senator Tom Umberg, 34<sup>th</sup> District  
Senator Bob Archuleta, 32<sup>nd</sup> District  
Senator Josh Newman, 29<sup>th</sup> District

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Members, Assembly Committee on Water, Parks & Wildlife  
Pablo Garza, Chief Consultant, Assembly Committee on Water, Parks & Wildlife