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ORANGE COUNTY'S GROUNDWATER AUTHORITY

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May 20, 2021

Sent via email: WUEStandards@water.ca.gov

Water Use Efficiency Branch
Department of Water Resources, P.O. Box 942836
1416 9th Street
Sacramento, CA 95814

RE: Public Review Draft Report to the Legislature on Results of the Indoor Residential Water Use Study – Comment Letter

Dear Water Use Efficiency Branch,

Thank you for the opportunity to comment on the California Department of Water Resources (DWR) *Public Review Draft Report to the Legislature on Results of the Indoor Residential Water Use Study (Study)*. Orange County Water District (OCWD) manages the local groundwater basin in Orange County, California. OCWD serves 2.5 million residents residing in 13 cities, five retail water districts, and one investor-owned water utility. These nineteen agencies include the cities of Anaheim, Buena Park, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Palma, Newport Beach, Orange, Santa Ana, Seal Beach, Tustin, and Westminster along with the East Orange County Water District, Irvine Ranch Water District, Mesa Water District, Serrano Water District, Yorba Linda Water District, and the Golden State Water Company.

The OCWD Board of Directors has taken a unanimous position in opposition to the findings in the Study based upon the rationale enumerated in this letter. DWR should focus on creating additional water supply versus arbitrarily and unnecessarily cutting the human right to water in our homes.

In the Study, DWR proposes to reduce the indoor residential water use standards from the current levels that were established in 2018 through negotiated policy bills that were enacted by the California Legislature, Assembly Bill 1668 (Friedman D-Glendale) and Senate Bill 606 (Hertzberg D-Van Nuys). More specifically, the DWR Study proposes to reduce the indoor residential water use standards from 52.5 gallons per capita per day (GPCD) in 2025 to 47 GPCD; and further reduces the standards in 2030 from 50 GPCD to 42 GPCD.

OCWD has four primary comments on the Study:

1. There is no analysis nor sufficient time to consider the possible impact to local reuse projects;
2. DWR has not honored their agreement to follow the statutory collaborative process in AB 1668 (Friedman D-Glendale) in preparing the Study;
3. There is no analysis nor sufficient time to consider the possible impact to local wastewater system infrastructure; and
4. DWR should focus on creating additional water supplies versus arbitrarily and unnecessarily cutting human water consumption in the home.

As background, OCWD is the home to the Groundwater Replenishment System (GWRS), the world's largest potable reuse facility, which creates a new local supply of water that we use to replenish the groundwater basin. The basin, a regional asset, provides 77% of the drinking water for north and central Orange County. OCWD, along with our project partner, the Orange County Sanitation District (OC San), is constructing the final expansion of the GWRS to increase production from 100 million gallons of water per day (mgd) to 130 mgd— enough water for 1 million people. Local rate payers will have invested \$920 million once the GWRS final expansion project is complete.

The new standards DWR has promulgated could result in insufficient flows being available to the GWRS that would prevent the treatment of 130 mgd of wastewater and result in a reduction in available local water supply. A significant amount of reuse infrastructure could become stranded resulting in the wasting of large amounts of rate payer money. OCWD could now be penalized for proactively working to reuse local wastewater. The estimated potential impact to the GWRS and other reuse projects throughout the state should be analyzed and provided in the DWR report.

OCWD would also like to point out that DWR's current efforts do not meet the intended legislative requirements to collaborate with, and include input from, water and wastewater agencies. AB 1668 (Friedman D-Glendale) requires:

“The studies, investigations, and report described in paragraph (1) shall include collaboration with, and input from, a broad group of stakeholders, including, but not limited to, environmental groups, experts in indoor plumbing, and water, wastewater, and recycled water agencies.”

Input from water, wastewater, and recycled water agencies before the recommendation for indoor residential water standards was made by DWR was missing. Essentially DWR staff has made an analysis on its own and is now in the process of defending its work. This is not what AB 1668 intended.

OCWD's third comment is regarding the potential impact to local wastewater collection systems. Reduced wastewater flows could limit the ability of flows to naturally flush the OC San collection system line which would increase stagnation of wastewater in the

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pipeline, increase corrosion and odors and could result in a higher wastewater strength which can have unintended consequences and impact the treatment facilities, including the GWRS. The estimated potential impact to the OC San collection system and other wastewater systems throughout the state should be analyzed and provided in the DWR report.

We respectfully request the DWR delay sending the Study to the Legislature until the above-mentioned issues are addressed. Should you have any questions or comments, please contact OCWD General Manager Michael Markus at mmarkus@ocwd.com or (714) 378-3305.

Sincerely,



Stephen R. Sheldon
Board President

cc:

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