

## LAST CHANCE TO SUMBIT COMMENTS ON INDOOR RESIDENTIAL USE STANDARDS

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In 2018, after months of negotiation, the Legislature passed a package of bills that expanded on existing law that required water providers to reduce their overall consumption by 20% by 2020. AB 1668 and SB 606 updated this by requiring a new urban "water use objective" that combines indoor residential water use, outdoor residential water use, outdoor irrigation of landscape areas with dedicated irrigation meters in connection with Commercial, Institutional, and Industrial (CII) water use, and a volume for distribution system water loss. MWDOC believed that moving to an objective water use standard was sound policy as a more sustainable approach over time rather than continuing with arbitrary percent reductions. Each section of the bill

package was the product of difficult negotiations that sought to balance impacts to existing water treatment facilities and investments in infrastructure for recycling.

The indoor piece was heavily negotiated and agreed upon by the bill's author, Assemblywoman Laura Friedman, and water suppliers to be set at 55 gallons per capita per day (GPCD) until 2025, 52.5 GPCD until 2030, and 50 GPCD beyond 2030. The legislation also required that the Department of Water Resources (DWR), coordinating with the State Water Board, provide a joint recommendation to the Legislature by January 1, 2021 on the indoor water use standard and allow for stakeholder input on the findings. The report was late, and in response, Assemblywoman Friedman introduced AB 1434 to incrementally lower the indoor water use standard starting in January 1, 2023 to 40 gallons per capita daily (GPCD) starting in 2030. The water community felt that while the DWR report was late, this bill was premature and its numbers were not based in any scientific fact.

DWR has recently issued its report and Assemblywoman Friedman has pulled AB 1434 for consideration this year. However, concerns remain about the report. DWR held a day-long workshop on May 21 in response to concerns raised regarding collaboration with stakeholders. However, the numbers were presented before collaboration occurred. Stakeholders did not have an opportunity to provide input to inform the draft standard prior to its release. Of larger concern, the DWR report did not include a quantitative analysis of the benefits and impacts of how the changing standard for indoor residential water use will impact water and wastewater management, including potable water usage, wastewater, recycling and reuse systems, infrastructure, operations, and supplies as required by AB 1668. Before DWR moves forward with recommending a changed standard, it must conduct meaningful quantitative analysis on the impacts of a changed standard.



Other concerns remain including cost impacts, feasibility, affordability and impacts to disadvantaged communities, and changes in population and impacts of the COVID pandemic including telecommuting. We are submitting a comment letter and encourage other stakeholders to do the same. Feedback is due by Friday, June 4 and can be sent to:

WUEStandards@water.ca.gov.