

May 6, 2022

To: Orange County Assemblymembers

**RE: SB 1157 (Hertzberg) – OPPOSE UNLESS AMENDED**

Dear Assemblymembers Chen, Choi, Daly, Davies, Nguyen, Quirk-Silva, and Petrie-Norris,

Orange County Business Council (“the Business Council”), the leading voice of business in Orange County, acknowledges that a reliable water supply is integral to the state’s economic health. The business community supports cost-effective, fair, comprehensive solutions to California’s water challenges, including efforts to help Orange County manage its water supplies as efficiently as possible<sup>1</sup>. However, SB 1157 (Hertzberg) is unworkable for water districts and does not reasonably balance its costs and benefits as currently written. **With great respect for the author, the Business Council must oppose SB 1157 (Hertzberg) unless amended in accordance with those requested by the water agency coalition.**

SB 1157 would codify the indoor residential water use objectives as outlined by a study conducted and released by the Department of Water Resources (DWR). This would change the standards for indoor residential water use beginning in 2025 to 47 gallons per capita daily (gpcd) and beginning in 2030 to 42 gpcd. Before this ambitious target is set, the Business Council joins the water agency coalition in asking that a quantitative analysis is performed to better understand the impacts the 2030 standard would have on water agencies, water affordability and the environment. The study conducted by DWR provided informative qualitative information, but the lack of a quantitative component casts serious concern on its reliability as evidence for the 2030 standard.

According to the California Water Efficiency Partnership, the total cost range for complying with the bill’s proposed 2030 standard is likely between \$2.8 and \$4.6 billion, meaning that water agencies would need to make substantial investments to reduce indoor residential use, for an estimated benefit of conserving only 354,000 acre feet of water more annually than the current 2030 standard set by SB 606 and AB 1668 (2018)—approximately half a percent of statewide water use. Secondary costs to wastewater and recycled water providers would also require significant investments. While the Business Council agrees with the author that there is tremendous value in water use efficiency programs that reduce urban runoff and over-watering<sup>2</sup>, these standards must be both based on the best available science and demonstrate cost-effectiveness.

Unless SB 1157’s 2030 standard is delayed to allow a quantitative analysis to be conducted, this bill risks eschewing evidenced-based policy and could be detrimental to water affordability without providing proportionate environmental benefits. **For these reasons, the Business Council respectfully asks you to vote NO on SB 1157 if the bill is heard in your Committee or on the Assembly Floor.**

Sincerely,



Jennifer Ward  
Senior Vice President of Advocacy and Government Affairs

cc: The Honorable Robert Hertzberg

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<sup>1</sup> See Orange County Business Council’s [Legislative Action Guide](#), page 37.

<sup>2</sup> Ibid., WS-19, page 39.