



500 S. Main Street, Suite #410, Orange, CA 92868 | P: (714) 953-1300 | F: (714) 953-1302 | www.ACCOC.org

May 26, 2017

The Honorable Laura Friedman
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0043

RE: AB 1669 (Friedman – D) Urban water conservation standards and use reporting. – OPPOSE

Dear Assembly Member Friedman:

The Association of California Cities – Orange County (ACC-OC) would like to express its opposition to the proposed legislation Assembly Bill 1669 (Friedman). This bill would require the State Water Resources Control Board, in consultation with the Department of Water Resources, to adopt long-term standards for urban water conservation and water use by May 20, 2021. The bill would authorize the board, in consultation with the department, to adopt interim standards for urban water conservation and water use by emergency regulation.

Existing law requires the state to achieve a 20% reduction in urban per capita water use in California by December 31, 2020. Existing law requires each urban retail water supplier to develop urban water use targets and an interim urban water use target. This bill would require the board, before adopting an emergency regulation, to provide at least 60 days for the public to review and comment on the proposed regulation and would require the board to hold a public hearing. AB 1669 would also authorize a court or public entity to hold a person civilly liable in an amount not to exceed \$10,000 for a violation of a regulation adopted under these provisions, unless the regulation provides otherwise. Further, AB 1669 would also authorize the board to issue a regulation or informational order requiring a distributor of a public water supply to submit information relating to water production, water use, or water conservation

These mandates would be unnecessarily burdensome to our municipalities. Adopting an emergency framework that would create better all-around drought planning and preparation, with flexibility for local governments is a much more effective model. It would encourage local investment in resilient water supplies, creating greater overall water security and drought resilience. California's recent drought demonstrated the pressing need for improvements in how we plan for and respond to exceptionally dry conditions. Water agencies across the state agree that smart, thoughtful enhancements to the state's drought planning laws can make California more drought resilient, unfortunately AB 1669 is not the best option to accomplish these goals.

The well-being of California's cities is of paramount importance to the ACC-OC. For this and the reasons described above, the Association of California Cities – Orange County opposes AB 1669. Should you have any questions about our position or about the ACC-OC, please



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contact Diana Coronado, ACC-OC's Legislative Affairs Director, at (714) 953-1300 or at dcoronado@accoc.org.

Sincerely,

Heather Stratman
Chief Executive Officer
Association of California Cities – Orange County

CC:

Orange County State Legislative Delegation
ACC-OC Board of Directors