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June 2, 2021

Karla Nemeth
Director
California Department of Water Resources
1416 9th Street,
Sacramento, CA 95814

Re: DWR Indoor Water Use Standards

Dear Ms. Nemeth:

The Orange County Sanitation District (OC San) provides wastewater collection, treatment, and recycling for approximately 2.6 million people in central and northwest Orange County. OC San’s primary mission is to protect public health and the environment through its services. As such, we would like to comment on the joint Department Water Resources and Water Board proposed recommendations for indoor water use standards as they relate to previously established standards set forth in AB 1668 (Friedman, 2018).

Throughout the years, Californians have increasingly become water efficient continuing to conserve more and more water. The proposed standard of 47 GPCD in 2025 and 42 GPCD in 2030 can have unforeseen circumstances for Wastewater Agencies such as OC San.

As well intended as the proposed standards are, reduced wastewater flows could limit the ability to self-clean and flush the collection system line, which will increase stagnation of wastewater in the pipeline, blockages, increase corrosion and odors and will result in a higher wastewater strength which can have unintended consequences and impact the treatment facilities. This could increase how often we clean and require us to add more chemicals to address odor concerns, both of which would increase costs to the ratepayers. Our facilities are sized to handle peak wet weather flow events, not GPCD (which is dry weather flows). Through our robust CIP, we plan to invest nearly \$3 billion over the next 10 years to maintain and upgrade our infrastructure at both our Plants in Huntington Beach and Fountain Valley and our collections system throughout our service area in Orange County, California.

Wastewater treatment is a biological process with demand for oxygenation, and physical processes with chemical usage related to solids concentration of the wastewater. While average wastewater flows may decrease, our facilities are sized to handle peak wet weather flow events. Operating and maintaining facilities that are sized to handle these infrequent events as well as decreasing average wastewater flows is a great challenge to OC San and other wastewater agencies. Most equipment cannot handle such wide range of flows efficiently.

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- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District

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Furthermore, some equipment and process tanks are left unused during normal dry weather flows which could lead to their inability to perform when needed during wet weather flow events.

OC San has worked in partnership with the Orange County Water District (OCWD) to fund and operate the Groundwater Replenishment System (GWRS), which works to purify and reuse approximately 70 percent of the wastewater being received by OC San currently. When the Final Expansion of the GWRS is completed in 2023, 100 percent of the wastewater received by OC San that is reclaimable will be recycled by the GWRS. That water is then pumped back into the groundwater basin to be re-used as indirect potable drinking water. In order for the GWRS to operate at full capacity, OC San needs to continue to see existing levels of flow from wastewater sources. Reducing the water consumption of this region could have contrary effects to the efforts of the GWRS and could leave unused capacity in treatment and storage facilities. The proposed standards do not address organizations such as OC San and OCWD that have the foresight of creating a reliable and sustainable water source for their service areas by recycling wastewater from various sources including indoor water use for drinking water.

For these reasons, the Orange County Sanitation District respectfully opposes the proposed changes to the indoor water use standards. Please do not hesitate to contact Jennifer Cabral, OC San's Administration Manager at (714) 593-7581 or via email at jcabral@ocsan.gov should you have any questions.

Sincerely,



David John Shawver
Board Chairman