



March 25, 2022

The Honorable Bill Quirk, Chair  
Assembly Environmental Safety and Toxic Materials Committee  
Legislative Office Building, Room 171  
Sacramento, CA 95814

**RE: AB 2811 (Bennett)—OPPOSE UNLESS AMENDED**

Dear Assemblymember Quirk:

On behalf of WaterReuse California and the California Association of Sanitation Agencies (CASA), we regretfully inform you that we must oppose AB 2811 (Bennett) unless the portion of the bill addressing onsite reuse is amended. The measure requires the State Water Resources Control Board (Water Board) by 2025 to mandate installation of onsite reuse systems for large commercial properties without the consultation or coordination with water or sanitation agencies. Consultation and coordination through the development of a local program is currently a requirement for the installation onsite reuse systems and was an important negotiated provision SB 966 (Wiener) -- the onsite reuse law of 2018.

It is expected that local programs for onsite reuse will be developed once the Water Board has finished drafting statewide onsite reuse regulations by 2023. It is premature to assume that a mandate overriding the local program provisions of SB 966 is needed or necessary.

The water community strongly supports onsite reuse and supported SB 966. The WaterReuse Association is a partner and financial supporter of the **National Blue Ribbon Commission for Onsite Reuse Nonpotable Water Systems**, which is advancing best management practices to support the use of onsite non-potable water systems at the local level. This Commission has recognized the importance of community choice and consultant with water and sewer providers as onsite reuse is implemented and expands.

California communities are all different and a variety of reuse regulations and program are needed to reflect the diverse portfolio of water uses and community needs. Some cities such as San Francisco have adopted a non-potable onsite reuse program, others like San Diego and Los Angeles are heavily invested and planning on the expansion of potable reuse, while other communities such as Irvine use "purple pipe" recycled water for almost 30% of their water supply.

More now than ever we find that coordinated water management is critical to develop sustainable supplies. With increased conservation wastewater flows have decreased steadily.

Local agencies need to plan years in advance to develop a potable reuse project or other recycled water projects. The mandate in AB 2811 will siphon off wastewater in communities and make this planning process unmanageable. This is why the consultation requirements in SB 966 is critically important.

For all these reasons we ask that you revise or remove the onsite reuse portion of AB 2811.

Sincerely,



Jennifer West  
WateReuse California  
Managing Director



Jessica Gauger  
CA Association of Sanitation Agencies  
Director of Legislative Advocacy & Public Affairs

cc: Asm. Thurston Smith, Vice Chair, Assm Environmental Safety & Toxic Materials Comm  
Members, Assembly Environmental Safety & Toxic Materials Committee  
Josh Tooker, Chief Consultant, Assembly Environmental Safety & Toxic Materials Comm.  
Gregory Melkonian, Republican Consultant  
Asm. Steve Bennett