

September 04, 2026

California Department of Housing and Community Development
Division of Codes and Standards
2020 W. El Camino Avenue
Sacramento, CA 95833

Re: SB 597 – Draft Research and Recommendations: Rainwater Catchment System Building Standards for Newly Constructed Residential Dwellings

Dear California Department of Housing and Community Development:

The California Water Efficiency Partnership (CalWEP) appreciates the opportunity to provide comments on the Department of Housing and Community Development's (HCD) SB 597 Draft Research and Recommendations: Rainwater Catchment System Building Standards for Newly Constructed Residential Dwellings. CalWEP supported SB 597 in 2024 and continues to support efforts to better understand how these systems can contribute to California's long-term water efficiency and water supply goals.

CalWEP supports HCD's recognition that the feasibility and cost-effectiveness of rainwater catchment systems can vary significantly based on local climate, building type, system design, and intended use. California's diverse climates and rainfall patterns warrant a flexible approach that considers the benefits and costs of these systems while avoiding a one-size-fits-all requirement. As HCD finalizes the report and recommendations, CalWEP respectfully recommends additional consideration and clarification in the following areas.

Water Savings and Potable Water Demand

CalWEP encourages HCD to more clearly distinguish between the amount of rainwater that can theoretically be captured, the amount that can practically be stored and used, and the resulting reduction in potable water demand.

For example, the draft report estimates approximately 39,000 gallons of water saved per household annually based on median roof size and average statewide rainfall. However, the report also recognizes that actual savings depend on factors including roof catchment area, rainfall patterns, storage capacity, system configuration, and intended end use.

CalWEP recommends that the final report clearly characterize estimates such as the 39,000 gallons as potential rainwater capture rather than realized potable water savings unless the assumptions necessary to achieve those savings are identified. This distinction will help ensure that the benefits of rainwater catchment systems are communicated accurately and consistently.

Pre-Plumbing and Future Water Reuse Opportunities

CalWEP encourages HCD to give additional consideration to pre-plumbing and other cost-effective measures that could make newly constructed residential dwellings capable of accommodating rainwater catchment or other nonpotable water sources in the future.

The draft report finds that incorporating pre-plumbing during new residential construction can facilitate future adoption of alternative water supplies, reduce future retrofit costs, and allow greater flexibility in adopting rainwater catchment and reuse systems over time. The report also identifies pre-plumbing as a low-cost strategy for preserving future water reuse opportunities while minimizing near-term impacts on housing construction costs.

While CalWEP recognizes that requiring fully installed rainwater catchment systems statewide may not be appropriate given California's varying conditions, we encourage HCD to further evaluate whether pre-plumbing or similar future-ready design measures could provide a cost-effective opportunity to support long-term water efficiency and resiliency.

California's limited water resources continue to be strained by a changing climate. Rainwater catchment represents one of many strategies that can help diversify local water supplies and reduce potable water demand when implemented appropriately. CalWEP appreciates HCD's work to evaluate these opportunities and encourages the Department to ensure its final recommendations are flexible, cost-effective, and supported by clear and transparent water savings assumptions.

Thank you for the opportunity to provide comments on the draft report. If you have any questions, please don't hesitate to contact Tia Fleming, Executive Director, at tia@calwep.org or (916) 552-5885.

Sincerely,



Tia Fleming
Executive Director
California Water Efficiency Partnership