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May 18, 2017

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**Ben Metcalf**  
Director  
California Department of Housing and Community Development  
2020 West El Camino Avenue  
Sacramento, CA 95833

**Re: AB 366 (Oberholte): Water Supply: New Residential  
Development-Building Permits (Oppose)**

Dear Dr. Smith:

The California Conference of Local Health Officers (CCLHO) voted at the CCLHO Semiannual Conference Business Meeting on May 3, 2017 to take an Oppose recommendation on AB 366 (Oberholte), a bill that would allow the issuance of a building permit for the construction of one detached single-family new residential unit on parcels without water supply connections, if the development meets certain criteria, including a parcel that existed before January 1, 2017, and if the water provided to those parcels will be obtained from a legal source and delivered by a licensed water hauler.

This bill, if enacted, would allow permitting of new residential housing stock that relies on an unsustainable source of water. Although water haulers are permitted to provide safe drinking water in California, their services should only be used as a last resort, when existing residential housing and water systems can no longer provide sufficient safe drinking water. Over time, this new housing stock may be inhabited by vulnerable communities, who will rely on more expensive, less reliable, hauled or bottled water.

This bill would also create new residential housing that may not have sufficient water for firefighters to protect homes and families threatened by fire, despite efforts to limit the size of parcels and existing firefighter response time. To protect public health and promote public safety, CCLHO recommends a position of oppose on AB 366.

CCLHO was established in statute in 1947 to advise the California Department of Health Services (now the California Department of Public Health), other departments, boards, and commissions, as well as officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

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This position of oppose is consistent with CCLHO's strategic priority of providing advice and scientific expertise on public health matters, and its legislative priority of providing recommendations on population-based issues that affect the health of vulnerable populations.

If you have any questions, please feel free to contact me at [Ken.Cutler@co.nevada.ca.us](mailto:Ken.Cutler@co.nevada.ca.us) or at 530-265-7154.

Sincerely and on behalf of the CCLHO membership,

*Original signed by Dr. Ken Cutler*

Ken Cutler, MD, MPH  
President, California Conference of Local Health Officers

cc: Glen Campora, California Department of Housing and Community Development  
Karen L. Smith, MD, MPH, Director, California Department of Public Health