



April 13, 2015

Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

CHAIRMAN

David Poole
Brookfield Residential

VICE CHAIRMAN

David Stearn
Lennar Homes

TREASURER / SECRETARY

Mike Mahoney
ConAm

PAST CHAIRMAN

James Schmid
Chelsea Investment Corp.

PRESIDENT & C.E.O.

Borre Winckel

AFFILIATES

California Building
Industry Association

National Association
of Home Builders

Re: Building Industry Association of San Diego County comments on mandatory conservation framework

Dear Ms. Bean,

The Building Industry Association of San Diego County represents 700 member companies and a workforce of 65,000 men and women. We have reviewed the preliminary information regarding the state's intent to implement a 25% statewide reduction in water use and offer the following comments and recommendations.

The Building Industry has been doing its part on water conservation for years and produces the most water efficient product ever created. This commitment to efficiency has been demonstrated numerous times and especially with the implementation of the Building Industry supported adoption of the California Green Building Standards Code (CALGreen) in 2010.

As a result, a home built today uses 50% less water than most of the existing housing stock throughout California. A new, traditional 3-bedroom, single family home with four occupants uses 29,000 fewer gallons of water per year when compared to homes built in 2005 and 46,000 fewer gallons per year when compared to homes built prior to 1980.

With new home construction leading the way on water efficiency, attention must be turned to the retrofitting of the existing housing stock. Before CALGreen was implemented, more than 7.5 million single-family homes were in existence and over half of those were built prior to any water conservation standards. Millions of homes could easily improve their efficiency standards at minimal costs which makes retrofitting an extremely cost-effective and viable way

of conserving and improving our water supply. If existing homes were required to comply with the 2013 CALGreen standards, over 300 billion gallons would be conserved annually. *Therefore retrofitting must be part of the conservation discussion.*

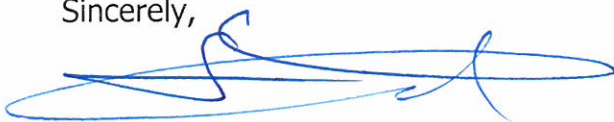
The Building Industry will continue to explore and support innovated ways to conserve water and actively support the Governor's proposal to update the State Model Water Efficient Landscape Ordinance. It is essential that any action protect the nearly 40,000 men and women employed locally in the construction industry and are a major part of the region's economic recovery.

However, we share the San Diego County Water Authority concerns with the impacts to our region by using the 2013 baseline because it fails to identify and acknowledge communities that already achieved major, sustained water conservation prior to 2013. Locally, water use in San Diego declined 20 percent from 2007 to 2013. Per capita water use in San Diego County has declined by 31 percent since 1990. By failing to account for this conservation, the proposed regulations punish those who have conserved and rewards communities that did not make such early and sustained commitments to conservation.

There is also a failure to acknowledge CWA's efforts to diversify water sources to become more self-reliant. Despite billions in investments such as the Carlsbad Desalination Project that will provide over 50,000 acre feet annually, the Governor's plan fails to give any credit to agencies that have made major water reliability investments. As has the construction industry, the CWA has walked the talk in water supply and efficiency and their effort should be recognized and taken into account.

We sincerely appreciate the Governor's leadership and action to address this crisis and his efforts to protect the state's economic well-being. We look forward to working together on realistic and comprehensive measures to ensure California's long term water supply.

Sincerely,



Borre Winckel
President and CEO