



April 13, 2015

State Water Resources Control Board
P. O. Box 100
1001 I Street
Sacramento, CA 95812

Attn: Jessica Bean
Drought Emergency Mandatory Regulations

The California Chamber of Commerce is the largest broad-based business advocate to government in California. Membership represents one-quarter of the private sector jobs in California and includes firms of all sizes and companies from every industry within the state. Nearly three-fourths of CalChamber members are companies with 100 or fewer employees.

We offer these comments in response to the State Water Resources Control Board's (Board) request for feedback on the draft regulatory framework.

The business community is concerned that conservation measures all ready in place will not be given proper consideration. As a part of the 2009 water package, urban and agricultural water suppliers were to implement measures to reduce 20 percent per capita of their usage by 2020. To achieve those reductions, the business and agricultural communities were asked by many districts to evaluate their usage and conserve where possible. Many businesses undertook a variety of improvements to reduce their water use.

We ask that these previous water conservation efforts be given consideration.

There are situations that lead some businesses to use water based on strategies to meet health and safety regulations. For instance, the food industry must meet stringent sanitation standards like the requirement that employees wash their hands for a set amount of time to insure cleanliness and to limit spreading diseases, and that all surfaces must be cleaned and rinsed, and utensils be washed at a certain temperature. Institutional settings like hospitals, medical and dental facilities all have stringent requirements for cleanliness that use water and may not easily find alternatives.

Then there are businesses that reducing water usage would equate to reducing product lines and therefore would result in lost jobs. Beverage manufacturers, bottlers, coffee shops, industries like micro chip processors and food processors for example would be put in jeopardy if 25 percent of their water usage were cut or if they had to pay significantly more for their water. Also, there are a number of businesses that purchase water under contract from districts for a set amount of time commonly a year or more at a time. What happens to those contracts? What, if any, provisions will be made for the instances where the business owner does not have control over the water used such as in apartment complexes that do not have individual meters per apartment or are in rent controlled cities that don't include the ability to raise rents to cover water usage?

We would seek clarity and guidance on these issues from the Board.

Sincerely,

Valerie Nera
Policy Advocate