



California Construction and
Industrial Materials Association

April 22, 2015

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the Draft Emergency Regulations Implementing the 25% Water Conservation Standard

Dear Chairman Marcus,

The California Construction & Industrial Materials Association (CALCIMA) appreciates the opportunity to comment on the Draft Emergency Regulations Implementing the 25% Water Conservation Standard.

CALCIMA is a statewide trade association representing construction aggregate, ready-mix concrete and industrial materials producers in California. Our members supply the materials that build our state's infrastructure, including public roads, rail, and water projects; help build our homes, schools and hospitals; assist in growing crops and feeding livestock; and play a key role in manufacturing wallboard, roofing shingles, paint, glass, low-energy light bulbs, and battery technology for electric cars and windmills.

The construction aggregate and industrial materials industry is the state's fourth largest economic driver, generating some \$230 billion in economic activity representing 16% of our state's overall output. Our skilled employees also earn more than \$86 billion in wages and benefits annually, supporting key projects statewide that benefit millions of Californians. Our industry further contributes nearly \$14 billion in ancillary economic activity annually to other major California industries.

CALCIMA and its members have been and will continue to be responsible stewards of our state's valuable water resources. The majority of our members utilize on site recycled water as part of their day-to-day facilities operations, reducing overall water consumption. Additionally, our members' facilities are required by local agencies, including respective Air Districts, to utilize water for conformance with the Federal Clean Air Act. It is our understanding that the guidelines set forth in the Draft Emergency Regulation Implementing the 25% Water Conservation Standard will not have a material impact on our industry's need to utilize water for applicable regulatory compliance. We believe the Board should consider if water used for regulatory compliance activities to meet air rules

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should be expressly included under the permit exemption provided in Sec. 864 (a). Perhaps a discussion with the Air Resources Control Board on this would be advisable.

We would also like to encourage the State Regional Water Board, Governor Jerry Brown, Publicly Owned Treatment Works Treatment Plants (POTWS), and the state's Air Districts to work collaboratively to explore responsible uses for recycled water and dewatering water from construction projects wherever and whenever possible for all projects not requiring potable water.

CalCIMA is encouraged that the Draft Emergency Regulation implementing the 25% Water Conservation Standard does not identify water used in manufacturing processes as an end-user target for reductions. CalCIMA believes this is in recognition of the high levels of water recycling currently employed by our industry and the beneficial economic impact our industry has on California's economy. Furthermore, it does not appear that the draft regulation would adversely impact the ability of local authorities to adjust for process water, nor does it appear to create any immediate economic hardships for our industry which serves such a critical role in the rebuilding and maintenance of our state's infrastructure, a key priority strongly supported by Governor Brown and the California State Legislature.

The members of CalCIMA and our industry as a whole continue to be responsible stewards of our state's water resources. Given the significance of the Draft Emergency Regulations Implementation, we appreciate the opportunity to comment.

Thank you,

ADriscoll

Angela Driscoll
Director, Local Government Affairs