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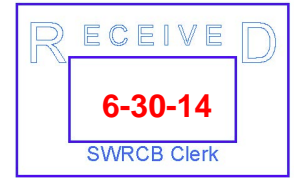
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June 30, 2014

Ms. Felicia Marcus  
Chair  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

Sent electronically: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Re: SWRCB Meeting, July 1-2, 2014 -- Comments on Agenda Item # 5  
(Consideration of a proposed Resolution regarding drought related emergency regulations for curtailment of diversions to protect senior water rights)

Dear Chair Marcus:

The California Building Industry Association (CBIA) appreciates the opportunity to comment on the proposed resolution regarding drought-related emergency regulations for curtailment of diversions to protect senior water rights.

CBIA has a long history of working with the state's urban, agricultural, and environmental water interests in pursuing a safe, clean, reliable supply of water for California. We support statewide efforts currently being considered by the Administration and the Legislature that provide critically needed funding for local, regional, and statewide projects that are also balanced with funding for environmental concerns. Additionally, we have self-funded important educational efforts with our new homeowners on issues such as water conservation and storm water management.

As the state looks for ways to conserve water during this multi-year drought, we bring to your attention the proactive measures the California homebuilding industry has been undertaking for years now to ensure that new homes are the most energy efficient and water-wise in the nation. For the past thirty-five years, the State of California together with its homebuilding partners have taken tremendous strides in reducing the overall energy-efficiency and internal water use in newly constructed homes. Through the implementation of the Title 24 residential building standards together with the CBIA-supported California Green Building Standards (CALGreen), new residential construction has slashed water consumption by 50% since the early 1980's. Consider that a typical new three-bedroom, single-family home with four occupants in California uses an estimated 46,500 gallons of water per year for internal use. This represents a savings of over 29,000 gallons of water per year from homes built in 2005 and 46,000 gallons of water per year from homes built in 1980.

We recognize that the main focus of the Resolution targets water right holders (post-1914, pre-1914, riparian) and whether or not the Board should consider a minimum health and safety needs component.

CBIA believes that in situations where municipal customers are fully dependent on a senior water right, there needs to be the inclusion of a minimum health and safety component that takes into account how water-wise that community is when making a determination.

Included along with the submittal of this letter is the California Homebuilding Foundation publication Codes and Standards Consulting – California’s Residential Indoor Water Use. It briefly summarizes and compares the level of water saved when comparing today’s home versus a home built in 2005 and prior to 1980.

In closing, we appreciate the opportunity to provide these comments and the information regarding residential indoor water use. If you are interested in additional information or ways to reduce residential indoor water use in the millions of existing homes in California, we welcome the opportunity to offer our thoughts.

Respectfully,

A handwritten signature in black ink that reads "R. Lyon". The "R" is tall and thin, the "L" is a large loop, and "Yon" is written in a cursive style.

Richard Lyon  
Senior Vice President