



December 2, 2015

The Honorable Felicia Marcus, Chair
The Honorable Frances Spivy-Weber, Vice Chair
The Honorable Tam Doduc, Member
The Honorable Steven Moore, Member
The Honorable Dorene D’Adamo, Member

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

COMMENT LETTER – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Water Resources Control Board,

On behalf of industrial water users, the undersigned would like to acknowledge the State Water Resources Control Board (Board) for your efforts to guide California through this period of severe drought. We recognize the enormous task you have in managing competing interests and our organizations hope to be a resource to you as you deliberate on water conservation measures moving forward.

We appreciate the opportunity to comment on the potential extension and modification of the existing Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulation) if the drought conditions persist into 2016.

It is important to note that the industrial sector has taken, and will continue to take, cost effective steps to reduce water usage. However, there are limits to the amount of water a plant can conserve and still be productive. Water is essential for many processes in facilities, including sanitation, food safety, product ingredients, product conveyance, and thermal processing. Each facility is unique and a “one size fits all” approach by the State will not work in the industrial sector. Therefore, we believe that local water suppliers must be given maximum flexibility in working with their industrial customers to establish reasonable water conservation targets.

For these reasons, we recommend that the Board maintain a focus on local agency discretion in any extension of the Emergency Regulation with regard to process water use conservation. This approach has the best chance of finding feasible water use reductions while protecting the economy. The industrial sector is a major source of state employment, income, and tax revenue. Manufacturers employ 1.2 million workers and provide \$230 billion in gross state product to California each year. By working with their local water districts, manufacturers can find the solutions that will provide regulatory certainty to control their costs and remain competitive.

We applaud the Board for including alternative compliance provisions in the current Emergency Regulation to provide flexibility to local suppliers in meeting their water use reduction mandates. We strongly recommend that these provisions continue to be included in any extension of the Emergency Regulation.

We are committed to continuing to work with you in developing thoughtful, meaningful policy options for assuring both water resilient communities and a vibrant economy in California. Thank you for your consideration.

Sincerely,

Agricultural Council of California
Almond Hullers and Processors Association
Automotive Specialty Products Alliance
California Chamber of Commerce
California Grain and Feed Association
California League of Food Processors
California Manufacturers and Technology Association
California Warehouse Association
California/Nevada Beverage Association
Chemical Industry Council of California
Consumer Specialty Products Association
Family Winemakers of California
Grocery Manufacturers Association
Industrial Environmental Association
Wine Institute

Copy to: Mr. Tom Howard, Executive Director, State Water Resources Control Board