May 22, 2009

Mr. Charles Hoppin, Chair, and
Members of the State Water Resources Control Board
1001 "I" Street,
Sacramento, CA 95814

Via E-mail: 2020 comments@waterboards.ca.gov

Dear Chair Hoppin and members of the Board:

Thank you very much for the opportunity to provide comment on the 20x2020 Urban Water Conservation plan. The Industrial Environmental Association (IEA) represents a broad spectrum of industrial, high tech and life science companies throughout Southern California. We have been actively engaged with local, regional and state agencies in responding to address the state's serious water supply shortage, with particular attention to measures in any mandatory conservation programs.

IEA certainly supports moving forward with a carefully thought-out plan that will achieve the state's goal of a 20% reduction by 2020 and guide future water conservation actions.

Following are points we would like to submit for comment during the consideration of this 20x2020 plan:

Per Capita Per Day Reduction in Gallons Used:

The plan places focus on reduction in gallons per capita per day (GPCD) by geographic regions as they way to achieve the 20% reduction goal. This is not a reasonable approach in dealing with Commercial, Industrial and Institutional (CII) users. IEA would like to suggest a process that instead achieves the goal through reasonable use by every urban customer allowing flexibility for the water agencies to demonstrate how they are contributing to meeting the goal.

Establishing Baselines:

IEA is concerned whenever baselines are established that appropriate credit is given for early, voluntary water conservation actions. Water is a costly raw material for businesses that must use it and a resource that directly affects the bottom line, as well as a company's environmental and sustainability program. Water-using businesses have a strong incentive to conserve and make its water use more efficient through cost-effective operational, facility and technologically-feasible improvements. That is why industrial facilities for many years have already been very serious about water efficiency practices and have undertaken extensive and substantive water use reduction and conservation measures at their sites to address landscaping, plumbing, fixtures, showers, kitchens, water features, cooling towers, manufacturing processes and compliance with worker health and safety requirements. The establishment of baselines for water agencies should take into account regional differences and also recognize those geographic areas where extensive conservation measures have already been put into place.

Recycled Water:

While the plan references recycled water, recycled water users should be exempt from conservation mandates if they are using recycled water to the maximum extent possible. It is also important that recycled water not be burdened by new regulatory requirements which would limit or discourage its use. New and successful technologies, such as using recycled water in cooling towers, need to be tested and implemented to insure that facility infrastructure and equipment maintenance and operation are not adversely affected by the recycled water.

Best Management Practices:

During the course of the past six months, we have been actively working with one local water supplier on Best Management Practices (BMPs) for industrial facilities. This has proven to be an extraordinarily difficult and time-consuming process due to actions that have already been taken, different operations and practices across industry sectors and economies of scale. We would like to recommend that an organization, such as the California Urban Water Conservation Council (CUWCC), form a working group of core sector industries to develop reasonable, practical, achievable and cost-effective BMPs for CII users include:

*Protection of CII customers who have already implemented measures that are identified in the BMP

*Credit for prior development of recycled water projects that serve CII uses or customers

*Preference for increased efficiency (improving productivity on stable water use) as opposed to absolute reductions in water use

*Local cost-effectiveness to districts and customers, and

*Regional achievement of any performance targets.

Basic principles for addressing CII BMPs that should be included in the work of the task force:

*Metrics which are appropriate to the water use in question
*Appropriate consideration of water used for cooling in manufacturing processes
*Appropriate consideration of water used as an ingredient in manufactured goods
*Local cost-effectiveness
*Appropriate credit for use of recycled water and issues associated with quality of recycled water
*Consideration of the regional nature of projects that would provide significant recycled water supplies to CII uses
*Consideration of regional achievement of objectives
*Consideration of the need for offsite public infrastructure to provide significant recycled water supplies to CII uses.

Increase the Use of Recycled Water and Non-Traditional Sources of Water:

IEA is very supportive of all efforts to increase the use of recycled water, to seek funding to expedite the expansion of the "purple pipe" system and to devise programs for water re-use. We feel there is significant opportunity to capture, treat and reuse stormwater runoff. We would recommend developing partnerships and pilot projects between municipal stormwater agencies and industrial facilities.

Thank you for your consideration of our comments.

Sincerely,

Patti Krebs

Patti Krebs
Executive Director