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January 6, 2016

Kathy Frevert  
State Water Resources Control Board  
Submitted via email - [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

**RE: Comments on Proposed Regulatory Framework**

Dear Ms. Frevert:

On behalf of the San Diego Regional Chamber of Commerce (Chamber), I am writing to express remaining concern in the State Water Resources Control Board Proposed Regulatory Framework (Framework). With approximately 2,500 members representing an estimated 300,000 employees, the Chamber is dedicated to promoting a business-friendly environment and growing the local economy. The Chamber understands the importance of water supply, reliability and cost, and have identified it as a top Chamber public policy priority.

While we are appreciative that the proposed Framework begins to address the inequities of the regulatory policy, we believe it continues to undervalue investments made in supply reliability. For example, conservation reduction could fully reflect investments in drought-resilient sources such as the Carlsbad Desalination Plant, potable-reuse and long-term agriculture-to-urban water transfers. To equitably reflect regional investments, the regulations should provide credit for pre-2013 supply development. This is not the first time Californians have been asked to cut back on use of water. Here in San Diego, conservation and supply development are top priorities of the San Diego County Water Authority, our water retailers, our business community, and residents. Our region has a long history of responding to droughts both by conserving and by diversifying water sources including substantial investments in drought-proof water supplies.

In addition, we respectfully request that the Framework be modified so the State Water Board can revisit the regulation by April 2016 to reflect then-current water supply conditions.

If you have any questions, please do not hesitate to contact Sean Karafin, Executive Director of Policy and Economic Research, at (619) 544-1352 or [skarafin@sdchamber.org](mailto:skarafin@sdchamber.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'J Sanders', is written over a white background.

Jerry Sanders  
President & CEO  
San Diego Regional Chamber of Commerce