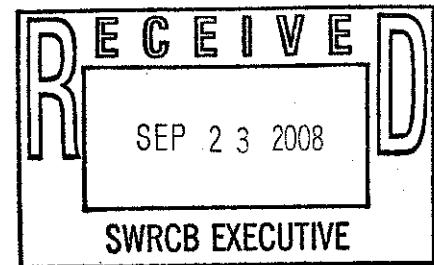




September 23, 2008

Ms. Tam Doduc, Chair
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814



**Re: Comment Letter-Proposal to Mandate
Water Conservation Management Practices**

Dear Ms. Doduc:

On behalf of the Industrial Environmental Association (IEA), we would like to provide comment on the State Water Resources Control Board's development of an urban water conservation regulatory program scheduled for workshop on October 1, 2008. We very much appreciate the significant challenges ahead and the state's leadership in addressing critical water supply shortages.

For a number of years, industrial facilities have been very serious about water conservation and have undertaken substantive water use reduction measures at their sites, including landscaping, plumbing, fixtures, showers, kitchens and water features. Many facilities have also found unique and innovative ways to recycle both their water and wastewater. Businesses with active environmental management and sustainability programs have focused on efficient water usage and reductions since water is both a cost and a natural resource.

Areas of concerns we have as the regulatory process moves forward:

*Methods for determining the efficiency of commercial, industrial and institutional (CII) water use should take into account the approach recommended by the California Urban Water Management Council;

*Establishment of a baseline year should provide a process whereby facilities which have already undertaken substantial conservation measures can demonstrate and receive credit for their reductions;

*Per connection mandatory reductions would penalize facilities that have already reduced their water usage;



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*Industrial "process" water should be considered very differently than "ancillary" or end-use water, as process water is critical to both the existing and the expansion of the state's economy; and

*Any mandatory measures undertaken must be shown to be cost-effective;

*Recycled water should not be included in the regulatory program;

*Incentives for extending the ability of water agencies to provide recycled water should be considered.

Thank you for your consideration of our comments.

Sincerely,

Patti Krebs
Executive Director