



To: commentletters@waterboards.ca.gov

Subject: "Comment Letter – Urban Water Conservation Workshop"

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

Thank you for the opportunity to submit these comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board.

Genentech is one of the leading biotechnology companies in the world and includes manufacturing facilities in its California locations in South San Francisco, Vacaville and Oceanside. We are in the business of delivering innovative therapies to patients with serious and life threatening diseases.

The Board's efforts to achieve increased water conservation during drought conditions through the current Emergency Regulation are appreciated. However, the regulations are creating unintended impacts.

- The current focus on achieving the state's water reduction standards solely through conservation eliminates benefits regional or local water agencies have achieved through prudent investments in water supply reliability. For example, here in San Diego County we support our local water agencies as they continue to make significant investments in developing a portfolio of sustainable water supplies specifically designed to make the region less vulnerable to droughts and water supply reductions. However, the current regulations remove drought protections these supplies provide by not allowing the water from these sources to be used toward meeting the state's emergency water use targets.

"Conservation-only" approach to comply with the state's conservation standards creates unintended impacts to the life science industry:

- Demand reduction targets as the state's primary drought response places California at a competitive disadvantage in terms of business attraction and business expansion,

especially in Biotechnology, as water is our number one commodity. Prolonged water use reduction mandates that do not take into account the availability of sustainable water supplies to meet California's economic needs creates uncertainty which can impact future life science investments in California. Life science industries need to be reassured the state and local water agencies are doing everything in their power to develop new and drought-resilient water supplies to avoid business impacts. One action the State can do now is amending the regulation to provide credits for new supply development.

It is critical to maximize the water reliability benefits of drought-resilient and sustainable water supplies during drought conditions to help support California's economy and quality of life. That is why Genentech supports modification to the Emergency Regulation to allow water agencies to meet reduction targets through a combination of conservation and investments to increase water supply reliability. This is a more balanced, more flexible approach to drought management that will help address the need to save water given our current supply challenge without endangering California's economy and quality of life.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Fitzgerald', written in a cursive style.

Don Fitzgerald
Vice President and General Manager
Product Operations, Oceanside