



December 1, 2015

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:

On behalf of Biocom, I am writing to submit comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board. Biocom leads the advocacy efforts of the Southern California life science community, representing over 700 member companies. Our members depend on a reliable, constant source of water for everyday business activities.

The current regulation's focus on achieving the state's water reduction standards solely through conservation does not recognize the long-term investments regional or local water agencies have made to stabilize and diversify their water supply reliability – investments in self-reliance that are consistent with Governor Brown's Water Action Plan.

Biocom has historically supported a number of practical ways to diversify the region's water supply, including indirect potable reuse and desalination. In San Diego County, water agencies have made billions of dollars in investments in developing a portfolio of sustainable water supplies specifically designed to make the region less vulnerable to droughts and devastating water supply cutbacks. The current regulations limit the region from benefitting from these investments.

Adequate access to water is a major factor for companies as they consider whether to locate research and manufacturing facilities in this region. If the trend of global companies choosing to locate in California is to continue, we must persist in promoting water independence and access to reliable sources of water at competitive rates. Businesses in our industry seek reassurance that the state is doing everything in its power to develop new and drought-resilient water supplies. One of the things the state can do now is amend 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's why we support modifications to the Emergency Regulation to allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies, such as desalination and potable reuse. This balanced, flexible approach to drought management will help save water now given our current supply challenge and better prepare California for future droughts.

Sincerely,

Joe Panetta, President and CEO
Biocom

