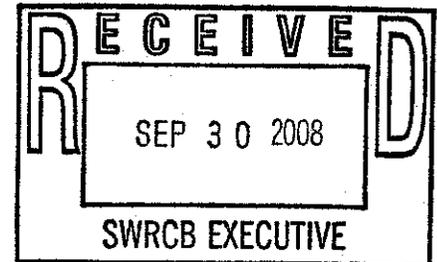


September 30, 2008

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



**Subject: Comments on the Development of an Urban Water Conservation Regulatory Program**

Dear Members of the State Water Resources Control Board:

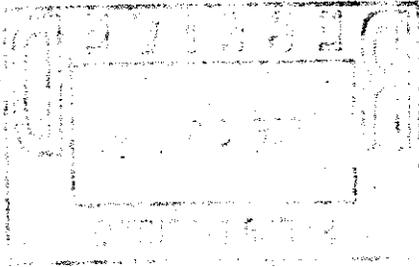
This letter transmits comments from the City of San José Municipal Water System (Muni Water). Muni Water is an urban water retailer whose service area includes a population of approximately 112,000 in San José. We have been a signatory to the California Urban Water Conservation Council (CUWCC) Memorandum of Understanding (MOU) since 1995.

Since 1987, we have been implementing successful conservation programs including complying with the CUWCC best management practices (BMPs). As a result of our efforts and other water agencies in Santa Clara County, since 1987 total water use countywide has remained roughly the same while population has grown by approximately 30%. Of this total water use, per capita indoor water use within the San Jose-Santa Clara metropolitan area has decreased by more than 20% since 1987.

We believe that the voluntary approach for water conservation thus far has achieved significant urban water savings in our region. For this reason, we urge the State Water Resources Control Board (State Water Board) to defer consideration of a regulatory approach for water conservation.

In addition, there are several on-going processes that will lead to more efforts and more results in conservation savings in the next few years. This includes the CUWCC update to revise and strengthen the BMPs and the possibility of requiring BMP compliance for state funding; the statewide process to develop targets to reduce urban per capita water use by 20 percent in 2020; and the implementation of AB 32 which includes a strong emphasis on conservation in the water sector.

We urge the State Water Board to defer development of an urban water conservation regulatory program. In the meantime, allow us and other water agencies to demonstrate through the revised CUWCC BMP program and the 20x2020 program that additional water can be conserved.



**THANKS** Sincerely, **ET ALI**

Mansour Nasser  
Deputy Director, Water Resources  
Environmental Services Department