



July 28, 2016

Ms. Karen Guz, Presiding Chair
Water Conservation Advisory Council
c/o Texas Water Development Board
1700 North Congress Avenue
Austin, Texas 78701

RE: Draft Water Conservation Advisory Council Report to the 85th Texas Legislature

Dear Ms. Guz:

On behalf of the Texas Association of Manufacturers (TAM), I am writing to express concern with the Draft Water Conservation Advisory Council (WCAC) Report to the 85th Texas Legislature as it pertains to manufacturing water conservation.

TAM represents over 500 large and small companies from every manufacturing sector, employing more than 894,000 Texans with an average compensation of \$79,350 a year (the highest in the private sector). Manufactured goods account for 94.6 percent of all Texas exports, and Texas has held the distinction as the number one exporting state in the United States for several consecutive years.

TAM agrees with WCAC's assessment that water conservation is the most-effective water management strategy to meet the state's water needs. That said, TAM believes that WCAC's proposed recommendation that "all industrial water users consider completing a water audit to identify and document all water coming into the facility and how and when that water is consumed on site" is misguided. First, the draft report does not recommend that any other category of water user perform an audit, and TAM does not support the manufacturing sector being singled out for this purpose. Second, for the Texas manufacturing sector, the best form of water conservation is based on best management practices appropriate for each facility, which *may* include evaluating cooling and process water practices, water audits, or sub-metering, but none of those options should be mandated in legislation since a one-size-fits-all approach is not appropriate in this context. Furthermore, because the sustainability of the Texas manufacturing sector is so highly dependent on water, TAM members already closely track and manage their water usage, file the required water conservation plans, complete the Texas Water Development Board's annual water use survey, and seek out opportunities to conserve water on a consistent basis.

TAM urges WCAC to better understand the best management practices already utilized by the Texas manufacturing sector prior to making recommendations to the Texas Legislature on how the sector can better conserve the state's water. Thank you for your consideration of these comments. If you have any questions or need any additional information, please do not hesitate to contact me.

Yours respectfully,

A handwritten signature in black ink that reads "Richard A. Bennett". The signature is written in a cursive style with a large, stylized initial "R" and "B".

Richard A. Bennett
President
Texas Association of Manufacturers