



Office of the City Manager

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CITY COUNCIL

Chris Vierra, Mayor

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April 13, 2015

Jessica Bean
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Mandatory Conservation Executive Order B-29-15; Comments on Proposed Regulatory Framework

The Governor's Call to action for all Californian's across our great state to conserve water is clearly needed.

The City of Ceres has proactively taken extensive measures to reduce our water usage and to promote water conservation since 2008 and began in earnest with the adoption of the 2010 Urban Water Management Plan, SBx7-7 and AB1420. Given our preceding conservation efforts, it is critical that the state look at our and other cities reductions prior to the 2013 baseline numbers.

We have reduced our water use by over 44% since 2008 and are currently using less water than in 1996, in spite of a population increase of over 48%. The city of Ceres will meet and surpass targeted goals for SBx7-7. With significant efforts over the past several years of drought, we have become a leader in Stanislaus County in water conservation. Furthermore, out of the 14 baseline conservation measures outlined in AB1420, The City of Ceres is currently meeting 11 of the 14 measures with a plan in place to meet the remaining three.

Although we appreciate the efforts of the state board with the current proposal, we have several concerns. Specifically, we feel that the board should consider each city's prior action, or lack of action, and urge you to make changes in the current criteria as proposed.

The experience of most agencies that have been proactive in water conservation has been that the early efforts of water meters, restricted water days, education, and enforcement often yielded the most significant and cost effective conservation

results. Therefore, for agencies such as Ceres, the proposed tier structure in essence will punish our previous efforts and reward those agencies who were less proactive and have begun conservation efforts since the established baseline of 2013.

If the current tier structure is to be retained, we would recommend a credit factor be established for an adjustment to take into account previous efforts back to 2010 or other appropriate year. Similarly, the same corrective factor should be used to add further restrictions to those agencies that did not start conservation efforts until after 2013.

Thank you for your time and consideration on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Toby Wells', with a stylized flourish at the end.

Toby Wells, P.E.
City Manager