



## City of Riverbank

6707 Third Street · Riverbank, CA 95367-2305

Phone: (209) 869-7101 · Fax: (209) 869-7100

April 21, 2015

Ms. 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**

Dear Ms. Bean:

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

The City of Riverbank appreciates the efforts of the state board with the current proposal; however we have several concerns. Specifically, we ask that the board consider each city's prior action, or lack of action, and urge you to make changes in the current criteria as proposed. The City of Riverbank has proactively taken measures to reduce water usage and to promote water conservation since 2010. It is critical that the state evaluate the reductions that were made in Riverbank, as well as those of other cities, prior to the 2013 baseline numbers.

Most agencies that have been proactive in water conservation experienced the most significant and cost effective conservation results closely following the installation of water meters, restricted watering days, and education. In Riverbank, this effort started long before 2013. Therefore, for agencies such as Riverbank, 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 regarding this matter.

Sincerely,

Jill Anderson  
City Manager