



CITY OF MANTECA

PUBLIC WORKS DEPARTMENT

April 22, 2015

State Water Resources Control Board

1001 I Street

Sacramento, CA 95814

Attn: Jessica Bean

Re: Comments on draft water regulations.

The City of Manteca has been planning for the wise use and conservation of water resources for many years. As one of the few communities in the region that has continued to grow through the recession, we have been proactive in planning for adequate water resources to continue to support economic growth and prosperity. A major part of this planning included the diversification of our water supply to insure a long term sustainable water supply consisting of ground water and surface water. In addition the City is currently half way through the planning process for a new reclaimed water system that will be able to irrigate all of our parks and public space. We have already invested the resources to construct and operate a water reclamation plant that produces high quality reclaimed water. However, we are still cognizant of the drought and its impact upon the entire state economy. For that reason we support the states issuance of water conservation regulations in principle. However, we have a few comments that we would like considered prior to adoption of new regulations.

- Timing for implementation of new standards.
While there is no question that significant steps are needed, the proposed cuts will force public agencies and citizens to react quickly and may result in significant negative impacts from lost landscape. The SB7x approach to phasing in water conservation allowed time for planning and implementing appropriate water conservation measures. Now you are asking that we exceed those standards in two months. Would you consider a phased approach? That would allow us to respond more appropriately and avoid rash decisions that will backfire if the drought abates next year.

- One size fits all approach
The state of California has very diverse geographic, demographic, economic and hydrologic conditions. While there is no justification for wasting water anywhere, there needs to be more allowance for areas that have proven sustainable supplies. Climatic conditions should also be accounted for. Coastal and desert communities with limited or no local water supply obviously shouldn't be supporting lawns and large turf areas and hence should have applicable GPCD targets/regulations. Inland areas that have sustainable water supplies should be provided some allowance to reflect the different supply and use factors. Imposing statewide GPCD levels will have a disproportionate effect on valley communities, many of which have adequate and sustainable water supplies.
- Implementation of Groundwater regulations
Last year the state finally adopted laws to regulate the use of groundwater. However, to be of any real value they need to be implemented much sooner than currently scheduled. In the current drought, wells continue to be over pumped and groundwater problems will be exacerbated in many areas.
- Credit for water conservation measures & open reporting
Last year our City reduced water use by 16%. This year the regulation doubles that to 32%. The states calculation of our GPCD doesn't seem to be correct and other agencies in the region report significantly different numbers. Please make sure that all reporting is consistent and transparent. Consistency in application of rules and accounting needs to be considered and carefully established especially if the state is headed toward imposing any penalties.

Conclusion

Hopefully this is the last year of the drought but it is quite possible this could go on for longer. The City of Manteca is committed to providing it's citizens with a long term reliable water supply but can only do that if laws are fairly imposed and enforced. We look forward to working with the State to provide a safe reliable water supply for our community and helping protect California's greatest resource.

Sincerely,



Mark Houghton

Director of Public Works

Via email to Jessica.Bean@waterboards.ca.gov