



CITY OF MANTECA

November 19, 2016

MANTECA CITY COUNCIL
STEPHEN DEBRUM, MAYOR
VINCE HERNANDEZ, COUNCILMAN
DEBBY MOORHEAD, COUNCILWOMAN
MIKE MOROWIT, COUNCILMAN
RICHARD SILVERMAN, COUNCILMAN

Felicia Marcus, Board Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Opposition to the State Water Resources Control Board Revised Phase 1 Substitute Environmental Document

Dear Board Chair Felicia Marcus:

The Manteca City Council hereby respectfully submits the attached *Resolution Opposing the State Water Resources Control Board 2016 Revised Draft Substitute Environmental Document and Calling for Sustainable Solutions for the Stanislaus River and the Region's Economy*. On September 15, 2016, the State Water Resources Control Board (SWRCB) released the revised Phase 1 Substitute Environmental Document (SED) that proposes changes to the current Bay-Delta Water Quality Control Plan. The proposal would significantly increase the amount of "natural flow" released to the Stanislaus River, which in turn would reduce water available to the region for other beneficial uses including power generation, irrigation and municipal uses.

Flows described in the SED will create "significant and unavoidable" lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, Merced, and San Joaquin counties, which encompasses the City of Manteca. Water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture – the region's economic engine – stable. This loss of water would result in the fallowing of some of the most prime farmland in California.

The Manteca City Council strongly encourages the SWRCB to pursue a comprehensive solution, which takes into account, rather than dismisses, the impacts listed in the City's Resolution. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before requiring flow increases that would threaten the economic vitality of our region's counties, cities, and small family farms.

We thank you in advance for your consideration of the City's very serious concerns regarding the loss of flows to our South County Water Supply Program. Please contact Mark Houghton, Public Works Director, at (209) 456-8416 or Elena Reyes, City Manager, at (209) 456-8064 if you have any questions or would like additional information.

Sincerely,

Steve DeBrum, Mayor
City of Manteca

c: Manteca State Delegation
Manteca City Council
Manteca Public Works Department
San Joaquin County Board of Supervisors
San Joaquin County Public Works
San Joaquin County Groundwater Banking Authority
South San Joaquin Irrigation District
Merced County Board of Supervisors
Merced City Council
Modesto Irrigation District
Modesto City Council
Oakdale Irrigation District
Stanislaus County Board of Supervisors
State Department of Water Resources

SD/ER

RESOLUTION R2016-227

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MANTECA OPPOSING THE STATE WATER RESOURCES CONTROL BOARD 2016 REVISED DRAFT SUBSTITUTE ENVIRONMENTAL DOCUMENT AND CALLING FOR SUSTAINABLE SOLUTIONS FOR THE STANISLAUS RIVER AND THE REGION'S ECONOMY

WHEREAS, the City, along with its partner agency, the South San Joaquin Irrigation District (SSJID), utilize certain water rights on the Stanislaus River including pre-1914 appropriative rights to divert water and various post-1914 appropriative rights to store water from the Stanislaus River in various reservoirs; and

WHEREAS, the South San Joaquin Irrigation District has successfully delivered surface water to the region of Southern San Joaquin County for over 107 years, providing the area with a high-quality, reliable surface water supply that has contributed to the economic vitality and strength of the local economy; and

WHEREAS, in 1995, the Cities of Escalon, Lathrop, Manteca, and Tracy came together with the District to develop the South County Water Supply Project, culminating in the construction and operation of the Nick C. DeGroot Water Treatment Plant and the delivery of treated surface water to the region's residents; and

WHEREAS, the State Water Resources Control Board's (SWRCB's) Bay-Delta Plan, Phase 1 Draft Substitute Environmental Document (SED) issued in December 2012 proposed to require the Stanislaus, Tuolumne, and Merced rivers release 35 percent of unimpaired flows from February to June each year for environmental benefit; and

WHEREAS, a revised Draft SED was issued on September 15, 2016, and is currently being circulated for public comment; and

WHEREAS, the SWRCB, after a hearing in March 2013 and submittal of comments regarding the adequacy and sustainability of the SED, has now revised and increased the recommendations of the Draft SED to 40% unimpaired flows, with the ultimate intention of finalizing the SED and updating the Bay-Delta Water Quality Control Plan with its Board for adoption at a date to be determined; and

WHEREAS, flows described in the SED will create "significant and unavoidable" lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, San Joaquin and Merced counties; and

WHEREAS, water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture – the region's economic engine – stable. This loss of water would result in the fallowing of some of the most prime farmland in California; and

WHEREAS, groundwater impacts of flows described in the SED include increased groundwater pumping at a time when California is working to implement the landmark Sustainable Groundwater Management Act. The SED estimates additional and significant groundwater reliance in the local East San Joaquin groundwater sub-basin, a basin that is already identified as critically overdrafted in San Joaquin County. The reduced surface water deliveries proposed in the SED will severely hamper the ability to conjunctively use surface water deliveries on farms to provide adequate groundwater recharge; and

WHEREAS, power impacts of flows described in the SED include public power agencies being resigned to generating more hydropower at a time of low demand, meaning less water is available to generate hydropower in summer when power demand is at its peak. This has economic impacts to public power agencies, and such impacts bear a direct relation to local customer utility rates; and

WHEREAS, there is reasonable and significant doubt that the flows described in the SED will benefit native fish populations or promote ecosystem restoration. The SED focuses narrowly on flows as a solution to environmental concerns while ignoring non-flow alternatives such as predator suppression and fish habitat restoration. Such non-flow management measures are often less costly and more effective; and

WHEREAS, the cities of Escalon, Lathrop, Manteca, and Tracy within San Joaquin County have made significant investments in diversifying their drinking water sources to include the use of water from the Stanislaus River. With the implementation of the SED, the use of river water for drinking water is threatened, leaving local communities even more vulnerable to the impacts of drought and potentially stranding significant investments in these vital assets.

NOW THEREFORE BE IT RESOLVED AND ORDERED, the State Water Resources Control Board should pursue a comprehensive solution, which takes into account, rather than dismisses, the impacts listed above. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before requiring flow increases that would threaten the economic vitality of our region's counties, cities and small family farms.


I HEREBY CERTIFY that the foregoing Resolution was duly adopted by the City Council of the City of Manteca at a public meeting of said City Council held on the 15th day of November 2016 by the following vote:

AYES: Hernandez, Moorhead, Morowit, Silverman

NOES: None

ABSENT: DeBrum

ABSTAIN: None

MAYOR: 
RICH SILVERMAN
Mayor Pro Tempore

ATTEST: 
LISA BLACKMON
City Clerk