

Julie –

I have been the Landscape Planner for the City of Manteca Parks Department for 14 years. In addition to Parks responsibilities, I have administered the MWELO for the Public Works Department the last 3-4 years. Attached are my comments regarding the MWELO update.

The City of Manteca has already reduced water consumption by 34% in the month of May by comparison to that of 2013. In addition the City is enforcing the Governor's drought declarations and started a "Lawn to Garden" lawn replacement program. The MWELO has actively been applied for parks projects, commercial projects and model homes. Developers, even with lots under the 2,500 SF threshold have already complied with the MWELO voluntarily as a BMP, reduced turf to 25% of the front yard area and are using drip in planters and high efficiency low-volume heads in the remaining turf. The parks, although considered a "special landscape area", have also reduced by at least 25% even though most are on irrigation wells. Parks is also implementing additional measures even to reduce the turf in parks to "areas of active play" even though it appears it will not be required with the MWELO update. My point is that the City is exceeding the intent of the MWELO already on a broader basis.

Lowering the MWELO threshold to 500 SF (a mere 20' x 25' area) will increase the amount of plan reviews and enforcement required by cities. This, at a time of economic recovery when some Cities are still under furloughs or operating at reduced staff levels due to the recession. This seems an excessive requirement that homeowners will have to meet, excessive to the landscape industry and an excessive burden to Cities.

On the Parks Department side, I mentioned that most of our Parks are watered using Irrigation wells and non-potable water. Since parks are actively used areas we try to limit our watering windows to hours when not in use. This is typically at night. If heads are running during the day, they are subject to getting kicked over and damaged. If operating a well for irrigation, you want that equipment to water as much as possible at one time to avoid extended runtime and wear to the system. For all of these reasons we want to water as many stations as we can as quick as possible. Using higher volume rotors in the turf areas is the best way to apply the water quickly within the watering window. Rotors are the most efficient and practical way to water large areas of turf, but it is impractical to expect that they will meet a .92 efficiency. Since parks typically contain a larger portion of turf this cannot be expected on a site wide basis either. This efficiency is not reasonable and Irrigation Auditors that audit park areas agree.

Under 492.5 Soil Management Report 1 (B) The soils analysis "may" include: Please change may to SHALL! All these things are needed and required. How can I verify load tickets and the correct qty. of amendment per 1000 SF, if this is not required? How can you design and irrigation system or good plant selection without infiltration rates? If the soil is high in salts, how is the designer going to know to use salt tolerant plants? Please change to SHALL!

492.7(1) (A) 2. If you are going to require meters, then they need to be from the water purveyor a privately owned meter will not be monitored or readings conveyed to the City so it will be worthless. If it is considered private this could prevent the purveyor from taking readings. Isn't the meter there so the purveyor can compare the water use against the MAWA??

Thank you for requiring master valves and flow sensors.

Thank you for requiring third part irrigation audits.

- Katie



Kathryn Reed
Landscape Planning Technician
City of Manteca