

DEPARTMENT OF WATER RESOURCES

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SACRAMENTO, CA 94236-0001
(916) 653-5791



September 12, 2017

Leah Brown
Water Conservation Specialist
City of Merced
1776 Grogan Avenue
Merced, California 65340

RE: Urban Water Management Plan Advisory Letter

Dear Ms. Brown,

The Department of Water Resources (DWR) has reviewed City of Merced's (City) 2015 Urban Water Management Plan (UWMP) received on June 27, 2016. The California Water Code (CWC) directs DWR to report to the Legislature once every five years on the status of submitted plans. In meeting this legislative reporting requirement, DWR reviews all submitted plans.

DWR's review of the City's 2015 UWMP has determined the following required element has not been addressed in accordance with the CWC:

DWR's review of the City's 2015 UWMP has determined the following required element has not been addressed in accordance with the CWC:

CWC 10632(a) Water Shortage Contingency Plan (WSCP). The WSCP and the City Ordinance do not include adequate prohibitions to address a 50% reduction in water use nor do they present a staged response to increasing levels of water shortage.

Additionally, there are minor corrections which should be addressed in the amendment for the item noted above.

Population

- SBX7-7 table 2, in Appendix C of the UWMP and within DWR's database, the method selected should be Method 4 "Other", rather than "Method 1 DOF" to reflect that the service area population is a combination of DOF data and UC Merced population.

- The language on page 6-9 should be modified to reflect that UC Merced is a separate part of the distribution system, rather than not being a part of the distribution system. Please modify this language to improve clarity.

Wastewater and Recycled Water Reporting. Please resolve these items:

- Treated wastewater is either recycled or discharged, not both. Yet DWR Table 6-3 (UWMP Table 6.6) reports wastewater as both.
- Water discharged to Hartley Slough should not be considered recycled water use, but should be reported as discharged water. See DWR Table 6-3 (UWMP Table 6.6), DWR Table 6-4. Numbers in UWMP Table 6.7/ WUEdata Table 6-4 and UWMP Table 6.6/WUEdata 6-3 should agree.
- Agricultural Irrigation. There is a discrepancy in the volume reported for agricultural irrigation for 2015 – DWR Tables 6-4 and 6-5 report 5,323 AF, but UWMP Tables 6.7 and 6-8 report 2,670AF with an additional category of Agricultural Irrigation/Environmental (Hartley Slough) 2,653 AF.
- Note that any changes made to the recycled water reporting in the tables mentioned above may also affect recycled water reporting in DWR Tables 4-3 and 6-8 (UWMP Tables 4.4 and 6.11).

This letter is to advise the City of these issues and to recommend that the City amend its 2015 UWMP to address these required elements. The City has 120 days from the date of this letter to submit an amended UWMP before DWR registers the status of this UWMP as “Requirements Not Addressed”. The City may request additional time to submit an amended UWMP, and if deemed reasonable by DWR, the status of the review will remain “Advisory Letter Sent” until the agreed upon date.

DWR encourages water suppliers to send drafts of the revised sections to DWR for review before adopting the revised plan. Please note that revised plans must be adopted by the City’s governing board following the public process specified in the UWMP Act.

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Please feel free to contact Gwen Huff at (916) 651-9672 if you have any questions or would like to discuss the review of 2015 Urban Water Management Plans.

Sincerely,



Vicki Lake
Unit Chief
Urban Water Use Efficiency
Department of Water Resources
(916) 651-0740

Electronic cc:
Ryan Orgill