



Councilmember Bill Zoslocki
City of Modesto
1010 Tenth Street, Suite 6200
Modesto, CA 95354
bzoslocki@modestogov.com

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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100
Via Email to: commentletters@waterboards.ca.gov

Subject: 2016 BAY DELTA PLAN AMENDMENT & SED

Dear Board,

Food

I'm sure you are aware that California is the nation's leading producer agriculture products. In 2012 California's farms and ranches accounted for \$42.6 billion in economic output, with milk production being California's largest agricultural industry.

Across the dairy products sectors, milk, butter, cheese, evaporated products and frozen desserts, dairy processing directly accounted for \$3.37 billion in value added.

California's grape production, the State's second largest account for \$3.65 billion in direct value added.

Fruit and vegetable canning, pickling, and drying; and soft drink and ice manufacturing sectors were responsible \$6.58 billion in direct valued added sales.

In terms of employment these sectors accounted for more than 220,000 jobs. These are statewide figures, but each and every one of these sectors is largely representative of the businesses operating directly in and around Modesto. The food and beverage processing industry in Stanislaus County employs approximately 25,000 people and adds a value of over \$2.3 billion to the local economy.

Why this is important is the proposed State Water Resources Control Board action by implementing the 2016 Bay Delta Plan Amendment & SED will have significant negative effect on the long-term viability of the local food and beverage industries. Many of the food processing industries in the Modesto area will experience the devastating economic consequences, as well as nearly every family living in Stanislaus County. If adopted as proposed, there will be smaller crop production, increased water cost, and a reduced competitive market in the local, national, and world markets.

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The 1995 Water Quality Control Plan designates beneficial uses and it does recognize Municipal & Industrial use as an important beneficial use. The SED will undervalue the municipal uses and fails to strike an appropriate balance among the competing uses of the water. That means urban water users will not be a priority when considered by SED against environmental uses.

For decades, Modesto has aggressively been planning and building an environmentally, eco-friendly, conjunctive reliable water supply. The just completed \$200 million "phase 2" Modesto surface water treatment plant combined with "phase 1" will ultimately produce approximately 60,000 AF of drinking water to supply water to Modesto, and perhaps other communities for the next 40 years.

Additionally, when completed this fall/winter 2017, the \$100 million dollar recycled water project will produce ultimately 35,000 AF of water a year for agricultural use. All told, the surface, aquifer and recycled water programs are a model for integrated water management. What a significant accomplishment for a city in California, but now the expected rewards of smart environmental planning have turned, in part, to liabilities, especially to cities such as Modesto with a conjunctive water system.

The mandated water reductions of the State Water Board in 2016 on municipal water users combined with severe flows restrictions expected in the SED on the lower San Joaquin Tributaries will have a crippling effect on Modesto's water system. The SED rules do not consider beneficial use or credit for recycle water.

First consider the economic impacts already realized during state mandated drought restrictions.

Modesto completed significant reductions by the end of 2010. In 2016 mandated drought restrictions, unfairly imposed to municipal systems, caused fixed operations rate increases to customers of 25%. Had volumes restriction not been imposed the inflationary increase would have been spread out to a modest 2-3% increase.

With the SED unimpaired flows caused reductions and concurrent increased fixed costs, Modesto municipal water customers will be burdened with a larger fixed cost, and likely idle up to 50% the surface water treatment plant.

None of this was considered remotely possible when planning Modesto's future water supply with its water supplier Modesto Irrigation District back 1995.

Shared Burden

Modesto has been environmentally conscious with water use and continues to improve on its system and conservation, as is evident by the current investment for the future. My question is can the State make the same claim?

California transfers water from the Delta. This includes water from the Stanislaus, Tuolumne, Merced, and San Joaquin rivers in the south, and the Sacramento, American, Feather, and many others rivers in the north. This allows the State Water project to deliver 2.4 million AF of water each year from the Banks Pumping Plant.

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The Central Valley Project is a federal water management project. On average, the Central Valley Project delivers 5.6 million AF of water each year, and both the State Water Project and the Central Valley Project sell water for agricultural, wildlife, management, and municipal use!

On average, California and the Federal Government serve easily the needs of more than 210 California cities through their municipal water systems (Table 1).

Included in Table 1 is information from the State Water Resources Control Board combined with information from the Water Education Foundation. Though this information is not complete in the sense of in-depth study, but an analysis indicates the information in the table is accurate. Because complete information is not available, the table indicates there is a large volume of water not being accounted for.

The conclusion from this information is that 2,221,431 AF per year is the average annual possible water demand for the 221 cities receiving water from the rivers that flow through the Delta or the Delta itself. Coincidentally, nearly all cities in this table **did not** maintain a reduction in their water consumption using the State mandated self-certification stress test for conservation last year. Conversely, the SED proposes that some cities, including Modesto, not only will be required to maintain significant conservation by the stress test methodology, but additionally, along with all of those relying on water from tributaries of the San Joaquin, bear the brunt of the devastating consequences from the unimpaired flow restrictions.

My point is that the State and Federal Government are pumping too much water from the Delta to begin with! If each of the 221 cities listed herein would reduce their urban water use by less than 14%, it would clearly meet the goals of about delivering 300,000 AF per year of unimpaired flows proposed by the SED.

However, the SED wants to put the entire burden on those in the southern San Joaquin River tributaries. This clearly is not correcting the problem, which is that the state and federal government are taking too much water from the Delta. What's next 60% of unimpaired flows or 70% of unimpaired flows? Shouldn't the issue be everyone needs to share in the sacrifice? Isn't this an issue that everyone needs to be part of the solution?

Sincerely,



Bill Zoslocki
Modesto City Council Member

Table 1 ⁱⁱ

	Supplier Name (Number)	Water Project	"Stress test" Conservati on Standard	Average Annual Potable Water Demand (acre-feet) ⁱⁱⁱ
1	Agoura Hills	State Water Project		
2	Alameda County Water District (403)	Other Major Water Systems	0%	45,403
3	Albany	Other Major Water Systems		
4	Alhambra City of (636)	State Water Project	0%	10,998
5	American Canyon City of (537)	State Water Project	0%	3,435
6	Anaheim City of (324)	State Water Project	0%	66,173
7	Antioch City of (516)	Central Valley Project	0%	17,754
8	Arcadia City of (699)	State Water Project	0%	16,933
9	Artesia (701)	State Water Project	0%	5,662
10	Avenal	Central Valley Project		
11	Azusa City of (635)	State Water Project	3%	20,185
12	Bakersfield City of (1007)	State Water Project	9%	42,779
13	Baldwin	State Water Project		
14	Bell	State Water Project		
15	Bell-Bell Gardens (703)	State Water Project	0%	5,107
16	Bellflower-Somerset Mutual Water Company (557)	State Water Project	20%	5,374
17	Belmont	Other Major Water Systems		
18	Benicia City of (510)	State Water Project	0%	5,824
19	Berkley	Other Major Water Systems*		
20	Beverly Hills City of (640)	State Water Project	0%	12,115
21	Brea City of (494)	State Water Project	15%	11,270
22	Brentwood City of (563)	State Water Project	0%	11,637
23	Buena Park	State Water Project		
24	Burbank City of (388)	State Water Project	0%	18,800
25	Burlingame City of (303)	Other Major Water Systems*	0%	4,324
26	Calaveras County Water District (376)	CC Water District	0%	5,259
27	California City	State Water Project		
28	Camarillo City of (390)	State Water Project	3%	9,256
29	Campbell	State Water Project, Central Valley Project & Other Major Water Systems*		
30	Canyon Lake	State Water Project		
31	Carlsbad Municipal Water District (650)	State Water Project	0%	17,832

32	Carpinteria Valley Water District (656)	State Water Project	0%	1,800
33	Carson	State Water Project		
34	Cerritos City of (586)	State Water Project	0%	9,257
35	Chino City of (352)	State Water Project	0%	15,733
36	Chino Hills City of (660)	State Water Project	0%	15,861
37	Chula Vista	State Water Project		
38	Claremont (702)	State Water Project	0%	11,328
39	Clayton	Central Valley Project		
40	Coalinga City of (1049)	Central Valley Project	5%	4,545
41	Commerce	State Water Project		
42	Compton	State Water Project		
43	Concord	Central Valley Project		
44	Contra Costa Water District (337)	Delta	0%	31,634
45	Corona City of (385)	State Water Project	0%	34,755
46	Coronado	State Water Project		
47	Costa Mesa	State Water Project		
48	Covina City of (1010)	State Water Project	12%	5,926
49	Cudahy	State Water Project		
50	Culver City (770)	State Water Project	0%	5,712
51	Cupertino	State Water Project, Central Valley Project & Other Major Water Systems*		
52	Cyprus	State Water Project		
53	Daly City City of (320)	Other Major Water Systems*	4%	7,326
54	Dana Point	State Water Project		
55	Danville	Other Major Water Systems*		
56	Diamond Bar	State Water Project		
57	Redding City of (1034)	Central Valley Project	0%	27,010
58	Downey City of (542)	State Water Project	0%	16,221
59	Duarte	State Water Project		
60	Dublin San Ramon Services District (307)	State Water Project	0%	9,899
61	East Bay Municipal Utilities District (291)	Other Major Water Systems*	0%	200
62	East Palo Alto	Other Major Water Systems*		
63	El Cajon	State Water Project		
64	El Cerrito	Other Major Water Systems*		
65	El Monte City of (532)	State Water Project	0%	2,267
66	El Segundo City of (1001)	State Water Project	2%	8,237
67	Fairfield City of (1014)	State Water Project	0%	20,917
68	Encinitas	State Water Project		
69	Escondido City of (380)	State Water Project	0%	23,983
70	Folsom City of (351)	Central Valley Project	0%	20,157

71	Vacaville City of (534)	State Water Project & Other Major Water Systems*	0%	17,193
72	Fortuna City of (525)	State Water Project	0%	1,353
73	Foster City	Other Major Water Systems*		
74	Fountain Valley City of (564)	State Water Project	0%	9,845
75	Fremont	State Water Project, Other Major Water Systems*		
76	Fresno City of (587)	Central Valley Project	0%	138,513
77	Citrus Heights Water District (302)	Central Valley Project	0%	13,338
78	Fullerton City of (723)	State Water Project	0%	29,232
79	Garden Grove City of (568)	State Water Project	0%	25,989
80	Gardena	State Water Project		
81	Glendale City of (768)	State Water Project	0%	27,133
82	Glendora City of (728)	State Water Project	20%	14,014
83	Goleta	State Water Project		
84	Hawthorne City of (405)	State Water Project	0%	4,495
85	Hermosa/Redondo (467)	State Water Project	0%	12,418
86	Highland	State Water Project		
87	Huntington Beach City of (375)	State Water Project	0%	30,306
88	Huntington Park City of (652)	State Water Project	0%	4,777
89	Imperial Beach	State Water Project		
90	Inglewood City of (776)	State Water Project	5%	9,842
91	Irvine Ranch Water District (340)	State Water Project	0%	64,771
92	La Canada Flintridge	State Water Project		
93	La Habra City of Public Works (579)	State Water Project	0%	10,082
94	La Mesa	State Water Project		
95	La Mirada	State Water Project		
96	La Palma City of (603)	State Water Project	0%	2,141
97	La Puente	State Water Project		
98	La Verne City of (722)	State Water Project	0%	8,338
99	Laguna Beach County Water District (591)	State Water Project	0%	3,839
100	Laguna Hills	State Water Project		
101	Laguna Niguel	State Water Project		
102	Laguna Woods	State Water Project		
103	Lake Elsinore	State Water Project		
104	Lake Forest	State Water Project		
105	Lakewood City of (657)	State Water Project	0%	8,134
106	Lancaster	State Water Project		
107	Lawndale	State Water Project		
108	Lemon Grove	State Water Project		
109	Lindsay	Central Valley Project		
110	Livermore	State Water Project		

111	Lomita City of (663)	State Water Project	0%	2,347
112	Lompoc	State Water Project		
113	Long Beach City of (295)	State Water Project	0%	58,735
114	Los Alamitos	State Water Project		
115	Los Altos/Suburban (473)	State Water Project	0%	14,152
116	Los Angeles	State Water Project		
117	Los Gatos	Central Valley Project		
118	Lynwood City of (658)	State Water Project	0%	5,827
119	Malibu	State Water Project		
120	Manhattan Beach City of (654)	State Water Project	0%	5,428
121	Martinez City of (531)	Central Valley Project	0%	4,736
122	Maywood	State Water Project		
123	Mid-Peninsula Water District (318)	Other Major Water Systems*	0%	3,188
124	Milpitas City of (313)	State Water Project	0%	10,253
125	Mission Viejo	State Water Project		
126	Monrovia City of (668)	State Water Project	12%	7,826
127	Montclair	State Water Project		
128	Montebello Land and Water Company (552)	State Water Project	0%	3,438
129	Moorpark	State Water Project		
130	Moreno Valley	State Water Project		
131	Morro Bay City of (292)	State Water Project	0%	1,227
132	Mountain View City of (513)	State Water Project	0%	11,461
133	Murrieta	State Water Project		
134	Napa City of (397)	State Water Project	0%	14,587
135	National City	State Water Project		
136	Newark	State Water Project		
137	Newport Beach City of (619)	State Water Project	0%	16,561
138	Norwalk (706)	State Water Project	0%	4,830
139	Norwalk City of (727)	State Water Project	0%	2,176
140	Oceanside	State Water Project		
141	Oceanside City of (409)	State Water Project	0%	28,727
142	Lincoln City of (548)	Central Valley Project	0%	9,903
143	Ontario City of (374)	State Water Project	0%	35,809
144	Orange City of (626)	State Water Project	0%	31,609
145	Oxnard City of (575)	State Water Project	0%	25,704
146	Palos Verdes (491)	State Water Project	0%	21,152
147	Paramount City of (743)	State Water Project	0%	6,575
148	Pasadena City of (745)	State Water Project	0%	32,678
149	Perris City of (1031)	State Water Project	0%	2,555
150	Pittsburgh	Central Valley Project		
151	Placentia (651)	State Water Project	0%	7,552
152	Pleasant Hill	Central Valley Project		

153	Pleasanton City of (331)	State Water Project	0%	15,668
154	Pomona City of (643)	State Water Project	0%	22,875
155	Port Hueneme City of (558)	State Water Project	0%	2,148
156	Poway City of (734)	State Water Project	0%	12,197
157	Rancho Cucamonga	State Water Project		
158	Rancho Santo Margarita	State Water Project		
159	Ranchos Palos	State Water Project		
160	Redlands City of (463)	State Water Project	0%	27,201
161	Redondo Beach	State Water Project		
162	Riverside City of (335)	State Water Project	0%	70,169
163	Rohnert Park	Other Major Water Systems*		
164	Rohnert Park City of (554)	State Water Project	0%	4,873
165	Rosemead	State Water Project		
166	S Arcadia (662)	State Water Project	0%	3,579
167	Oroville (422)	State Water Project	0%	2,987
168	San Bernardino	State Water Project		
169	San Bernardino City of (470)	State Water Project	0%	44,098
170	San Clemente City of (633)	State Water Project	0%	10,033
171	San Diego City of (426) adj to 17%	State Water Project	0%	33,629
172	San Dimas (666)	State Water Project	0%	12,300
173	San Fernando	State Water Project		
174	San Francisco Public Utilities Commission (368)	Other Major Water Systems*	0%	80,810
175	San Gabriel (771)	State Water Project	0%	2,676
176	San Jacinto City of (688)	State Water Project	0%	2,894
177	San Jose City of (344)	State Water Project	0%	20,547
178	San Jose Water Company (348)	Other Major Water Systems*	2%	139,043
179	San Juan Capistrano City of (691)	State Water Project	0%	8,714
180	San Marcos	State Water Project		
181	San Marino	State Water Project		
182	San Rafael	Other Major Water Systems*		
183	Santa Ana City of (690)	State Water Project	0%	39,209
184	Santa Barbara	State Water Project		
185	Santa Clarita	State Water Project		
186	Santa Fe Springs City of (685)	State Water Project	0%	6,340
187	Santa Madera	State Water Project		
188	Santa Maria	State Water Project		
189	Santa Maria City of (378)	State Water Project	0%	14,376
190	Santa Monica City of (333)	State Water Project	0%	14,033
191	Santa Rosa City of (315)	Other Major Water Systems*	0%	19,933
192	Santee	State Water Project		
193	Saratoga	State Water Project		
194	Seal Beach City of (632)	State Water Project	0%	3,792

195	Signal Hill	State Water Project		
196	Simi Valley (710)	State Water Project	0%	7,322
197	Solano Beach	State Water Project		
198	South Gate City of (460)	State Water Project	0%	8,231
199	South Pasadena City of (752)	State Water Project	0%	4,458
200	Stanton	State Water Project		
201	Suisun City	State Water Project		
202	Suisun-Solano Water Authority (609)	State Water Project	0%	3,991
203	Sunnyvale	State Water Project		
204	Sunnyvale City of (523)	State Water Project	5%	20,290
205	Temecula	State Water Project		
206	Temple City	State Water Project		
207	Thousand Oaks City of (638)	State Water Project	0%	12,304
208	Torrance City of (753)	State Water Project	0%	20,457
209	Tustin City of (629)	State Water Project	0%	12,187
210	Union City	State Water Project		
211	Upland City of (708)	State Water Project	0%	21,324
212	Vallejo City of (1043)	State Water Project	0%	17,296
213	Vista Irrigation District (395)	State Water Project	0%	19,456
214	Walnut	State Water Project		
215	Walnut Creek	Central Valley Project		
216	West Covina	State Water Project		
217	West Hollywood	State Water Project		
218	Westminster City of (317)	State Water Project	0%	12,400
219	Yorba Linda Water District (294)	State Water Project	0%	21,905
220	Yucaipa Valley Water District (469)	State Water Project	20%	12,026
221	Yucca Valley	State Water Project		
Total				2,221,431
Percentage				0.135
Unimpaired Flow Saving				300,782

ⁱ page 5.3.4-2 PEIR on SFPUC Water System Improvement Program / 203287

ⁱⁱ Information derived from www.waterboards.ca.gov/water_issues/programs/...reg/uw_self-cert_submittals.xlsx
Aug 16, 2016 - 1, 379 Self-Certifications received by the State Water Board, "Stress test and Water Education
Foundation <http://www.watereducation.org/where-does-my-water-come>

ⁱⁱⁱ Blanks fields totals are a result of unknown volume or included in other agencies totals.

