



CITY OF BRISBANE  
Department of Public Works  
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(415) 508-2130



January 30, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
Cal/EPA Headquarters  
1001 "I" Street, 24th Floor  
Sacramento, CA 95814-0100  
*sent electronically to "commentletters@waterboards.ca.gov"*

**Re: Comment Letter – 2016 Bay-Delta Plan Amendment & SED**

Dear Ms. Townsend:

The City of Brisbane submits the following comments regarding the *Recirculated Draft Substitute Environmental Document in Support of Potential Changes to the Water Quality Control Plan for the San Francisco Bay-Sacramento/San Joaquin Delta Estuary: San Joaquin River Flows and Southern Delta Water Quality* (SED). In addition, the City of Brisbane would like to incorporate by reference separate comments submitted by the Bay Area Water Supply and Conservation Agency (BAWSCA) and the San Francisco Public Utilities Commission (SFPUC) that provide more detail of the SED proposal's impact on the City of Brisbane's service area and the region.

Under the SED, the State Water Resources Control Board (SWRCB) proposes substantial changes to flow objectives for the Tuolumne River. These changes are anticipated to result in significantly reduced surface water available for diversions, thereby causing significant, potentially unavoidable impacts to water supply and the environment. Below we provide relevant information that the SWRCB must consider in conducting its analysis of the SED's impacts.

As a wholesale customer that purchases 100% of its potable water supply from the SFPUC's San Francisco Regional Water System, water supply available to the City of Brisbane under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.

The City of Brisbane has been known for our low water consumption since our incorporation in 1961. **Residential gallons per capita per day (R-GPCD) is presently fifty (50). A 50% reduction would lower that number to twenty-five (25) R-GPCD. This reduced value is approximately 95 liters per person per day! Please note that 100 liters per person per day is considered "... necessary to provide for some minimum acceptable quality of life ..."**<sup>1</sup> in water-scarce regions.

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<sup>1</sup> M. Falkenmark, quoted in "Basic Water Requirements for Human Activities: Meeting Basic Needs", by Peter Gleick, page 87 of *Water International*, Vo. 21, No. 2 (1996)

Without exaggeration, a case can be made that the reduced surface water available under the SED could force the City of Brisbane residential water customers to lower their usage to values defined as the bare minimum for basic human rights in developing countries.

Notwithstanding the important objectives of the Bay Delta Plan to establish water requirements to protect fish and wildlife uses of the Bay-Delta's waters, knowingly imposing flow regimes on the Tuolumne River that during drought periods will mandate a R-GPCD of 25 for the City of Brisbane water customers is unacceptable, and would abdicate responsibility for establishing an appropriate Bay-Delta objective for human uses of its waters.

In light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, the City of Brisbane requests that the environmental, economic, and human impacts of any shortage on the San Francisco Regional Water System be fully and adequately analyzed as part of the SWRCB's proposed flow alternatives. Such full and adequate analysis should be given at least equal weight with all other elements of the SWRCB's subsequent deliberations and decision-making.

Last, the Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. The City of Brisbane requests that the SWRCB provide adequate time for voluntary agreements to be reached amongst the stakeholders prior to any action on the SED. Please give this settlement process a chance for success instead of expediting implementation of the current proposal. The City of Brisbane shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,

A handwritten signature in black ink, appearing to read "Clayton L. Holstine". The signature is fluid and cursive, with the first letter of the first name being a large, prominent capital 'C'.

Clayton L. Holstine  
City Manager