



City of Foster City

ESTERO MUNICIPAL IMPROVEMENT DISTRICT

610 FOSTER CITY BOULEVARD
FOSTER CITY, CA 94404-2222



February 22, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board, Cal/EPA Headquarters
1001 "I" Street, 24th Floor
Sacramento, CA 95814-0100

Subject: COMMENT LETTER – 2016 BAY-DELTA PLAN AMENDMENT & SED

Dear Ms. Townsend:

The City of Foster City/Estero Municipal Improvement District 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 Foster City/Estero Municipal Improvement District 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 Foster City/Estero Municipal Improvement District 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 of SFPUC that purchases 100% of its potable water supply from the San Francisco Regional Water System, water supply available to the City of Foster City/Estero Municipal Improvement District under the SED proposal could be reduced by more than 50% under drought conditions for multiple consecutive years.
- The City of Foster City/Estero Municipal Improvement District has made significant strides in water conservation in the past 10 years. Residential per capita water use has decreased 32.6%, from 95 gallons per capita per day (gpcd) to 65 gpcd.
- Based on the City of Foster City/Estero Municipal Improvement District's 2015 Urban Water Management Plan, this significant cut to water supply would force the City of

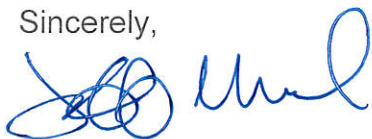
Foster City/Estero Municipal Improvement District to take a number of significant actions, including further water restrictions to water consumption such as reducing water budgets for landscape irrigation, as well as measures identified by the City in the City's Municipal Code and to minimize nonessential uses of water so that water is available for human consumption, sanitation, and fire protection.

- The City of Foster City/Estero Municipal Improvement District serves water to 37,518 residential customers, over 1,000 businesses, and approximately 15,000 non-residential employees working in Foster City. Potential consequences of the SED proposal include: health and safety concerns due to lack of potable supplies, major job losses, slower economic growth, and delayed community development in the City of Foster City/Estero Municipal Improvement District service area.
- Since outdoor use represents a relatively small proportion of the City of Foster City/Estero Municipal Improvement District's commercial, industrial, and institutional account, water demand, commercial, industrial, and institutional customers generally have fewer opportunities to reduce water use without changing their operations or incurring significant economic impacts.

In the light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, the City of Foster City/Estero Municipal Improvement District requests that environmental and economic impacts of any shortage on the San Francisco Regional Water System and the associated lost jobs and delayed development 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.

Lastly, the Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. The City of Foster City/Estero Municipal Improvement District 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 Foster City/Estero Municipal Improvement District shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,



Jeff Moneda, P.E.
Public Works Director/District Engineer
City of Foster City/Estero Municipal Improvement District

cc: Subject/Chron