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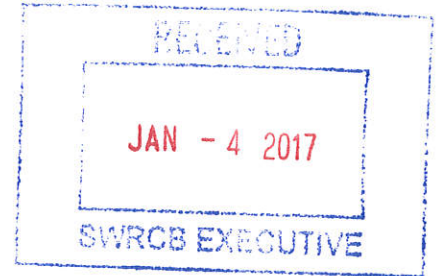
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Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

December 28, 2016

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



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

Dear Ms. Townsend:

The North Coast County Water District (NCCWD) 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, NCCWD 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 NCCWD 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 NCCWD under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- NCCWD has made significant strides in water conservation since 2000. Residential per capita water use decreased 32% from 85.35 gallons per capita per day (gpcd) to 57.9 gpcd.

Based on NCCWD's 2015 Urban Water Management Plan, this significant cut to water supply would force NCCWD to take a number of significant actions including, instituting

Stage 4 rationing that would limit per capita water use to approximately 30 gallons per person per day. At this usage level, NCCWD customers would face extreme hardship. At 30 gallons per person per day, all NCCWD customers would need to install rainwater cisterns and graywater systems to simply water any plants, flush toilets, or wash pets. This is unacceptable when alternatives exist to prevent such hardship.

- Since outdoor use represents a relatively small proportion of NCCWD'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, NCCWD strongly 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.

Last, the Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. NCCWD requests that the SWRCB provide adequate time for a 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. NCCWD shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,

Joshua Cosgrove
President

A handwritten signature in blue ink, appearing to read "Joshua Cosgrove", is written over the typed name and title. The signature is fluid and cursive, with a long horizontal stroke extending to the right.