

## PUBLIC WORKS DEPARTMENT

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March 15, 2017

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

Ms. 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](mailto:commentletters@waterboards.ca.gov)



### COMMENT LETTER – 2016 BAY-DELTA PLAN AMENDMENT & SED

Dear Ms. Townsend:

The purpose of this letter is to submit comments from the City of Mountain View 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, Mountain View 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 on the impacts of the SED proposal on Mountain View'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 significantly reduce surface water available for diversions, causing dramatic and potentially unavoidable impacts to water supplies and the environment. These changes are concerning to the City for the following reasons:

- The City is a wholesale customer of SFPUC, purchasing approximately 85 percent of its potable water from the San Francisco Regional Water System. Under this proposal, this supply could be reduced more than 50 percent if drought conditions persist for multiple consecutive years.
- Based on Mountain View's 2015 Urban Water Management Plan, supply reductions in excess of 40 percent would require ceasing all landscape irrigation except as needed for fire prevention, erosion control, and environmental mitigation (irrigation of public parks, playing fields, day-care centers, and school grounds would be allowed to irrigate one day per week), eventually causing loss of landscaping and trees throughout the City. If the water-saving measures were not adequate to generate needed water use reductions, additional and more severe measures would likely be adopted by the City Council,

potentially creating additional hardships and impacts to local and regional economic health.

- Mountain View purchases surface water from the Santa Clara Valley Water District (SCVWD), whose imported and local supplies would also be subject to potentially significant reductions in a drought, reducing the City's ability to offset SFPUC water supply reductions.
- Reductions in SFPUC supplies may force Mountain View to use more local groundwater. Since groundwater recharge is largely dependent on programs managed by the SCVWD, significantly increased groundwater pumping could have consequences such as groundwater overdraft, sea water intrusion, and land subsidence, which were not adequately analyzed in the SED.

In the last several years, it was necessary for California water retailers to respond aggressively to reduced water supplies and ensure adequate resources were available for all needs. The following illustrates Mountain View's commitment to reduce water use during the recent drought and plan for future water supply challenges as part of our environmental sustainability efforts.

- Mountain View's conservation programs and outreach helped reduce residential per capita water use from 83 gallons per capita per day (gpcd) in Fiscal Year 2005-06 to 57 gpcd in Fiscal Year 2015-16, a decrease of 31 percent. Additionally, total water use in 2016 decreased 28 percent from 2013, and there have been similar reductions in many BAWSCA agencies. The success of the City's water conservation programs, as well as the savings generated by regional water suppliers, demonstrate a strong commitment to reduce water use and ensure adequate supplies for all water needs.
- Mountain View has made major investments to develop new supplies. In 2009, the City placed into service a distribution system which provides recycled water to parks, a golf course, and numerous businesses in the City's North Bayshore Area. We are continuing efforts to improve the quality of our recycled water and actively working on expansion of this system to increase recycled water use.
- Mountain View is working with the SCVWD and local cities to analyze options for purifying the City's wastewater and using this supply for indirect and direct reuse projects.

Mountain View serves water to over 75,000 residents and over 3,000 commercial and industrial customers. Potential consequences of the SED proposal include health and safety concerns due to lack of potable supplies and delayed community development in Mountain View's service area, impacting the region's economic growth and ability to create needed housing. In light of these potential impacts as well as those articulated in the BAWSCA and SFPUC comment letters, the City of Mountain View requests that environmental and economic impacts of any

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shortage on the San Francisco Regional Water System be fully analyzed as part of the SWRCB's proposed flow alternatives. This analysis should be given at least equal weight with all other elements of the SWRCB's deliberations and decision making.

The City shares the SWRCB's concerns regarding the environmental health of the Delta and related water supply issues, and hopes to work collaboratively to develop a balanced solution. It is my understanding the Governor has also indicated his strong support for negotiated voluntary agreements to resolve these issues. Based on Mountain View's substantial investment in recycled water, our ongoing efforts to establish and expand the use of alternative water supplies, demonstrated success with water conservation efforts, and the Governor's support for negotiated agreements, the City of Mountain requests the SWRCB provide adequate time for a voluntary agreement to be reached amongst the stakeholders prior to final action on the SED.

I appreciate the SWRCB's consideration of Mountain View's concerns regarding this critical water supply action. Please contact me at 650-903-6311 or [mike.fuller@mountainview.gov](mailto:mike.fuller@mountainview.gov) if you have questions regarding the City's comments on this issue.

Sincerely,



Michael A. Fuller  
Public Works Director

MAF/GAH/7/PWK  
905-03-15-17L-E

cc: Ms. Nicole Sandkulla, Chief Executive Officer/General Manager,  
Bay Area Water Supply & Conservation Agency

CM, APWD – Hosfeldt