



CITY OF DALY CITY

333-90TH Street
DALY CITY, CA 94015-1895
PHONE: (650) 991-8000



February 15, 2017

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

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

Dear Ms. Townsend:

The City of Daly City (Daly City) 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, Daly City 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 the Daly City service area and the region.

Daly City is a wholesale customer of the SFPUC that on average purchases 55% of its potable water supply from the San Francisco Regional Water System, with the remaining 45% from local groundwater supplies from the Westside Basin Aquifer. Under the SED proposal, the State Water Resources Control Board (Board) proposes substantial changes to flow objectives for the Tuolumne River, and these changes are anticipated to result in significantly reduced surface water available for diversion. Daly City is also one of 26 member agencies of BAWSCA, and BAWSCA is on record stating it "will work with other stakeholders to protect water quality in the Bay Delta for humans, fish and other wildlife." Daly City will partner with BAWSCA as it also recognizes that the Bay Delta ecosystem is not sustainable.

However, a path forward as envisioned by the Board under the SED process is itself not sustainable. The City of Daly City has serious concerns over the adequacy of the Board's reliance on the environmental document which fails to fully address a number of significant impacts affecting local water supplies with an amended 40% unimpaired flow (February to June) on the San Joaquin River annually and resulting consequences to local land use planning.

Locally, Daly City continues to face a structural budget deficit as it has yet to come out from the economic recession of 2008. To address this deficit, local land use planning is focused on diversification of retail, commercial and expanded housing as a means to recover from impacts associated with the economic downturn. Most of Daly City's available "new water" to meet this local demand is a result of conserved water, used to bolster an existing surface water Individual Supply Guarantee from the San

Francisco Regional Water System of 4.292 million gallons a day assuming Regional Deliveries of 184 million gallons a day. Daly City enjoys among the lowest per person water use in the Bay Area, which does not seem to engender much recognition within the current public discourse. Before this most recent drought, Daly City residents used 63 gallons per person per day, which is over one-third of the average Daly City residential use before the 1976 drought of 104 gallons per person per day. For calendar year 2016, Daly City retained a 4% mandated conservation target, and the community achieved just over 11% in savings from its 2013 baseline usage with a resulting per person use of 52 gallons per person per day.

Yet under the SED proposal, Daly City residents would be subject to upwards of 40% mandated cutbacks in dry years and be exposed to a three-fold increase in drought frequency. If the unimpaired flow regime under SED comes to reality, it would place added burdens on residents who can justly claim a strong conversation ethic. This impact to local supplies places an uncertainty on economic development in Daly City such that locally anticipated projects may not go forward as planned. Such impact has not been adequately addressed part of the Board's analysis presented in the SED.

It is precisely the inherent uncertainty upon water supplies that is inadequately addressed under the environmental review before the Board, coupled with a reliance on flow regime when the issues confronting Delta restoration are far more complex, that is the basis for Daly City's concerns posed in this letter. There are other fishery management options, gravel enhancement, predatory fish removal, and habitat restoration, just to name a few, than just a singular focus on flows. A flawed environmental analysis will simply lead to lengthy court battles by one party or another and will do nothing to achieve policies to restore the Bay-Delta estuary.

Daly City concurs with a settlement approach, as advocated by BAWSCA and SFPUC, as a rational way forward because there is too much at stake and too much uncertainty associated with the SED proposal. Allowing all stakeholders to craft a negotiated settlement provides for a strategic process for all parties on how to share the river better and enhance ecologic sustainability sought by all. It is an approach Daly City hopes the Board will endorse.

Sincerely,



Patricia E. Martel
City Manager