

Purissima Hills Water District



March 13, 2017

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

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



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

Dear Ms. Townsend:

Purissima Hills Water District (PHWD) 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, PHWD 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 PHWD's service area and the region.

PHWD is supportive of the State Water Resources Control Board's (SWRCB) efforts to update the Bay-Delta Plan for the protection of fish and wildlife and recognizes the difficult challenge of trying to balance the beneficial uses of water in the Bay-Delta. However, PHWD has serious concerns with the SWRCB's current proposal to substantially change the flow objectives for the Tuolumne River and the adequacy of the Draft SED to fully consider and analyze the potentially significant and unavoidable impacts the SWRCB's proposal would have on the water customers that rely on water from the San Francisco Regional Water System operated by the SFPUC.

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 PHWD under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.


Based on PHWD's recent experience, this significant cut to water supply would force PHWD to take a number of significant actions including, but not limited to, implementing a moratorium on new development in the service area, importing water, and minimizing nonessential uses of water so that water is available for human consumption, sanitation, and fire protection.

- PHWD serves water to over 6,000 residential customers and over 10 businesses and other non-residential customers, including Foothill College. 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 PHWD's service area as well as SFPUC' Regional Water System's service area.

In the light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, PHWD 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. PHWD 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. PHWD 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 "Patrick Walter". The signature is fluid and cursive, with the first name "Patrick" and last name "Walter" clearly distinguishable.

Patrick Walter
General Manager