



Planning, Building and Code Enforcement

HARRY FREITAS, DIRECTOR

March 17, 2017

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

Subject: Comment Letter – Bay-Delta Plan Substitute Environmental Document (SED)

Dear Ms. Townsend:

Thank you for the opportunity to provide comments on the Substitute Environmental Document (SED) for the proposed update to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan). The City of San José is concerned with the analysis of groundwater impacts during periods of water supply shortages and drought conditions identified in the SED. Recent multiple-dry year conditions (since 2011) as well as historic drought rates in California have shown that water shortage has become more frequent and is an expected and common occurrence throughout the State.

The current water allocation in the Bay-Delta Plan has been factored into the environmental analysis for both current development being implemented and future development anticipated to occur in plans adopted by the City including the City's General Plan, the North San José Development Policy Area Plan, and other master planned areas through the year 2040. The proposed changes to water allocation in the Bay-Delta Plan Phase I will result in water stress to existing development in the north San José area as approximately 4.5 million gallons per day of water would need to be extracted from groundwater using new wells, which would result in potential adverse environmental effects to groundwater basins within Santa Clara County. The anticipated environmental effects include construction of multiple groundwater wells, land subsidence resulting from overdrawn aquifers, potential groundwater contamination, and adverse impacts to groundwater-dependent ecosystems. Therefore, the City requests that the final SED include a discussion of the environmental impacts to groundwater basins under multiple-dry year conditions, where intermittent customers like the City of San José, are not allocated water from Hetch Hetchy Reservoir.

We appreciate your consideration of our comments on the significant impacts to the City of San Jose. Please contact David Keyon, Environmental Planner, at david.keyon@sanjoseca.gov or (408) 535-7898 if you wish to discuss our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Reena Brilliot".

Reena Brilliot, Interim Environmental Planning Division Manager
Department of Planning, Building, and Code Enforcement

CC: Kerrie Romanow, Director, Environmental Services Department
City of San José City Attorney's Office
City of San José Mayor's Office