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

March 8, 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



Dear Ms. Townsend:

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

The Alameda County Water District (ACWD) 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).

ACWD supplies drinking water to over 349,000 residents and the businesses in the cities of Fremont, Newark, and Union City in southern Alameda County. ACWD has a diversified portfolio of water supplies which includes the San Francisco Regional Water System (RWS), State Water Project, and local groundwater and surface water. In addition, through implementation of our Integrated Resources Plan, ACWD has invested over \$100M in innovative alternative water supplies and water management practices including brackish groundwater desalination, water use efficiency, conjunctive use groundwater recharge facilities, and off-site groundwater banking. ACWD was one of the founding member agencies of the California Urban Water Conservation Council and has invested heavily in water use efficiency. Over the past 10 years, ACWD's total per capita water use has decreased 33%, from 156 gallons per capita per day (gpcd) to 104 gpcd.

ACWD is also making significant investments to ensure that its operations on Alameda Creek are conducted in an environmentally sustainable manner. To accommodate restoration of a steelhead (*Oncorhynchus mykiss*) fishery on Alameda Creek, ACWD is actively implementing a comprehensive fisheries program which includes construction of three fish ladders, removal of one inflatable rubber dam, and screening of all of our diversion facilities, with total investments in fisheries restoration projects exceeding \$54M.

ACWD's water supply reliability investments have reduced its dependence on imported supplies from the Delta and the San Francisco Public Utilities Commission (SFPUC) from about 60% to currently just over 40%. Despite these significant investments, ACWD still relies on the RWS

for roughly 20% of our potable water supply on average. Additionally, because of the dry year storage provided by the RWS, ACWD's reliance on SFPUC supply is highest in dry and critically dry periods, providing upwards of 30% of potable supply utilization.

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 reduced surface water available for diversions, thereby causing significant, potentially unavoidable impacts to water supply and the environment. Based on data provided by the SFPUC, ACWD's analysis of the potential reductions in water supply resulting from the SED identifies the following, potentially significant impacts:

- Substantial increase in the frequency of supply shortfalls experienced by ACWD customers, from 1 in 16 years under current conditions to 1 in 6 years with SED.
- A doubling in the magnitude of water supply shortfall during critically dry years, from 10% to 20%
- Depletion of ACWD's groundwater bank in Semitropic, requiring the need to acquire new additional water supplies for purposes of banking to ensure water supply reliability during droughts.
- Increased reliance on local groundwater stored in the Niles Cone Groundwater Basin, a coastal aquifer, particularly during droughts. This increases the probability for saltwater intrusion and degradation of the potable aquifer, becoming even worse as Climate Change induced sea-level rise occurs.

ACWD also questions the notion within the SED that any water supply shortfall can simply be mitigated with water transfers. Water transfers are temporary in nature, unpredictable in cost and quantity, complicated to obtain and implement, and are dependent on regulatory approvals. In 2015, and despite the State Water Resource Control Board's support (which we greatly appreciated), ACWD and the Contra Costa Water District were unable to execute a transfer of 5,000 AF of our own, secured water supply. Despite having all regulatory approvals, the Central Valley Project and State Water Project Coordinated Operations were not willing to execute the transfer due to temporary and unpredictable Delta flow conditions. By the time suitable conditions returned, the permits had expired. Given the uncertainties of water transfers, ACWD does not believe that dependence on unsecured transfers is a responsible approach to meet the needs of customers during normal, dry, and multiple dry water years.

In the light of these aforementioned impacts, as well as those identified by Bay Area Water Supply & Conservation Agency (BAWSCA) and the SFPUC, ACWD requests that the environmental impacts of any shortage on the RWS, as well as the associated statewide, regional, and local economic impacts to the Bay Area and ACWD's service area, be fully and adequately analyzed and considered as part of the SWRCB's proposed flow alternatives.

Jeanine Townsend, Clerk to the Board

Page 3

March 8, 2017

Lastly, ACWD concurs with the Governor's support for negotiated voluntary agreements to resolve these issues and requests that the SWRCB provide adequate time for stakeholders prior to any SWRCB action on the SED. While ACWD certainly supports the importance of being a good steward of the environment, ACWD shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,

A handwritten signature in blue ink that reads "R. Shaver". The signature is fluid and cursive, with the first name "Robert" and last name "Shaver" clearly legible.

Robert Shaver  
General Manager

tn/tf