

PUBLIC WORKS DEPARTMENT



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

February 23, 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



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

Dear Ms. Townsend:

The City of Redwood 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, Redwood 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 of the SED proposal's impact on Redwood City'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 result in significantly reduced surface water available for diversions, thereby causing significant, potentially unavoidable impacts to water supply and the environment. 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 Redwood City under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- Redwood City has made significant strides in water conservation in the past 16 years. Residential per capita water use decreased 44% from 91 gallons per capita per day (r-gpcd) to 51 r-gpcd, and gross per capita potable water use has decreased 45% from 139 gpcd to 76 gpcd.

- Based on Redwood City's 2015 Urban Water Management Plan, this significant cut to water supply would force Redwood City to take a number of significant actions including, but not limited to; prohibiting outdoor irrigation with potable water, a moratorium on new water connections and development, reducing water system pressure, suspending all flushing activities, implement mandatory water allocations with severe penalties including reducing residential and commercial uses more than 50%, and to minimize nonessential uses of water so that water is available for human consumption, sanitation, and fire protection.
- Redwood City serves water to 87,000 residential customers and over 2,500 businesses and other non-residential customers. 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 Redwood City's service area. It is likely that further environmental impacts will result due to the displacement of jobs and residents to other parts of California should Redwood City not have the water resources to continue to support our community, and Redwood City feels these impacts should be evaluated as well.
- In Chapter 22 of the current draft of the SED it states several water supply management alternatives for urban water suppliers in response to reduced surface water supplies including; expanding ground water pumping and recharge in place of surface water use, developing recycled water sources, purchasing water from other parties, and water conservation. Redwood City has invested heavily in water conservation, and recycled water to increase our supplies of drinking water, and there may not be much room for growth beyond what is currently planned for these sources. Redwood City has also investigated the use of groundwater as a domestic supply, finding that the aquifer and groundwater quality within our jurisdiction would require considerable treatment with relatively small amounts of supply. Additionally, Chapter 22 appears to focus on the impacts to the areas directly affected by the San Joaquin River and its tributaries, and does not include environmental impacts that would be realized when Water Suppliers like Redwood City must find new sources of domestic water supplies.
- Since outdoor use represents a relatively small proportion of Redwood City's commercial, industrial, and institutional water demand, commercial, industrial, and institutional customers generally have fewer opportunities to reduce water use without changing their operations or incurring significant economic impacts.

In light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, Redwood City 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. Redwood City 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. Redwood City 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 "Ramana". The signature is written in a cursive style and is underlined with a blue line.

Ramana Chinnakotla
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