



UTILITIES DEPARTMENT

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

December 22, 2016

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 Palo Alto (Palo Alto) 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, Palo Alto 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 Palo Alto'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 Palo Alto under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- Palo Alto has made significant strides in water conservation in the past 10 years. Residential per capita water use decreased 40% from 200 gallons per capita per day (gpcd) to 121 gpcd.
- Based on Palo Alto's 2015 Urban Water Management Plan, this significant cut to water supply would force Palo Alto to take a number of drastic actions including, but not limited to, a potentially costly increase in incentive-based demand side management programs, escalated information, outreach and education programs, and more rigorous and resource intensive enforcement activities. In addition to a suite of water use restrictions



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required in less severe water shortages, Palo Alto would place a moratorium on new water service connections (unless the customer pays for sufficient offsetting conservation measures to be applied elsewhere in the service territory), prohibit ornamental landscape and turf irrigated, prohibit washing of vehicles, and prohibit sprinkler irrigation to ensure nonessential uses of water are minimized so that water is available for human consumption, sanitation, and fire protection. Protection of Palo Alto's valuable urban canopy will be of concern during such severe restrictions.

- Palo Alto serves water to more than 25,000 residential customers and more than 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 Palo Alto's service area.
- Since outdoor use represents a relatively small proportion of Palo Alto's commercial, industrial, and institutional account water demand, commercial, industrial, and institutional customers generally have fewer opportunities to reduce water use without changing their operations or incurring significant economic impacts.
- Such reductions in water supply from the SFPUC may force Palo Alto to use emergency local groundwater supplies, having unknown, and potentially significant undesirable results, such as groundwater overdraft, sea water intrusion, and subsidence, which were not adequately analyzed in the SED.

In the light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, Palo Alto 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. Palo Alto requests that the SWRCB provide adequate time for a voluntary agreement 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. Palo Alto shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,



Ed Shikada  
Assistant City Manager / General Manager of Utilities