

Stanford University

SUSTAINABILITY AND ENERGY MANAGEMENT

February 28, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
Cal/EPA Headquarters
1001 "I" Street, 24th Floor
Sacramento, CA 95814-0100



Sent via Electronic Mail:
commentletters@waterboards.ca.gov

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

Dear Ms. Townsend:

Stanford University (Stanford) 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, Stanford 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 on the potential and unanalyzed impacts resulting from the proposed Water Quality Control Plan amendments (WQCP amendment) and the SED on Stanford and the region.

As proposed in the WQCP amendments and the SED, the State Water Resources Control Board (SWRCB) proposes substantial changes to instream flow objectives for the Tuolumne River. These changes are anticipated to result in significantly reduced surface water available for diversions and beneficial uses in the Bay Area, thereby causing significant, potentially unavoidable impacts to water supply and the environment. Below we provide some of the 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 Stanford under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- Such reductions in water supply from the SFPUC may force Stanford University and other nearby water retailers to use more local groundwater supplies, causing unknown, and potentially significant undesirable results, which were not adequately analyzed in the SED.
- Under drought conditions, Stanford may be forced to rely more on local surface water supplies, causing unknown, and potentially significant impacts; in addition, local surface water supplies would likely be greatly depleted or completely unavailable during drought conditions, which were not adequately analyzed in the SED.

- Stanford has had significant success in water conservation in the past 15 years. The success of Stanford's Water Conservation and Efficiency Program is demonstrated by decreased domestic water use from 2.7 million gallons per day (mgd) in 2001 to 2.1 mgd in 2014, despite more than 2.5 million square feet of new campus facilities added. In 2015, a new energy facility was commissioned and resulted in an additional 15% reduction in Stanford's domestic water use. These achievements leave few opportunities for further efficiency enhancements to reduce demand to the levels of water supplies estimated under the SED proposal. The conserved supply is already dedicated to Stanford's planned campus growth.
- Given the interconnected nature of the economy within the Bay Area and BAWSCA service area, Stanford will be impacted by water shortages on the San Francisco Regional Water System resulting in economic and environmental impacts to neighboring communities and the Bay Area as a whole.
- As non-essential outdoor use represents a relatively small proportion of Stanford's institutional potable water demand, Stanford has fewer opportunities to reduce water demand and use without substantial modification to campus operations and significant impact to research and educational facilities.

In light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated by reference, Stanford 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 equal consideration with other elements of the WQCP amendments and SED in the SWRCB's deliberations and decision making on the WQCP amendments and SED.

Finally, the Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. Stanford 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 the implementation of the current proposal. Stanford supports SFPUC in its commitment to participating in efforts to improve and enhance fish and wildlife conditions within the Tuolumne River and the San Joaquin Estuary. Stanford also shares BAWSCA's and SFPUC's commitment to work closely with the diverse interests and stakeholders in the Bay Area to do their part to contribute to shared solutions.

Sincerely,



Tom W. Zigterman, P.E., D.WRE
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Department of Sustainability & Energy Management
Stanford University