



March 3, 2017

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

Public Works

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:

We are submitting 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, we 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 our Menlo Park Municipal Water District (MPMWD) 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 the MPMWD under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- MPMWD has made significant strides in water conservation in the past 10 years. Total water use decreased 31.5% from 3.25 million gallons per day (MGD) to 2.23 MGD.
- Based on our 2015 Urban Water Management Plan, a 50% cut to water supply would force MPMWD to take a number of significant actions including developing water budgets for all water accounts and notifying account holders, and not approving new potable water connections, new temporary meters or permanent meters, except under special circumstances.
- MPMWD serves water to 3,600 residential customers and over 250 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 our service area.

- Since outdoor use represents a relatively small proportion of our 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.
- MPMWD relies 100% on SFPUC water. MPMWD's only other emergency supply is via interconnections with adjacent water agencies. However, these adjacent water agencies also rely primarily on SFPUC water, so a 50% cut to SFPUC water would be detrimental to our system's ability to provide water to our customers.

In the light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, the MPMWD 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. We request 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. We share BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

If you have any questions about this letter, please do not hesitate to contact me by phone at (650) 330-6725 or by email at jicmurphy@menlopark.org.

Sincerely,



Justin Murphy
Public Works Director