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February 27, 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:

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The Mid-Peninsula Water District (MPWD) 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, the MPWD 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 the MPWD 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 MPWD under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- The MPWD has made significant strides in water conservation in the past 10 years. Residential per capita water use decreased from an average baseline of 126 gallons per capita per day (gpcd) over the 5-year period between 2003 and 2007 to 85 gpcd in 2015.
- Based on the MPWD's 2015 Urban Water Management Plan, this critical cut to water supply would force the MPWD to take a number of significant actions including, but not limited to, implementation of a rationing program, eliminate line flushing, modify rate structures and/or implement rationing surcharges, impose a moratorium or net zero demand increase on new service connections, prohibit landscapes, issue fines/penalties, utilize flow restrictors, and/or rely on water use

surveys to minimize nonessential uses of water so that water is available for human consumption, sanitation, and fire protection.

- The MPWD serves water to a total of 7,977 connections—70% residential customers and 30% businesses, commercial/industrial/institutional, 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 the MPWD service area.
- Since outdoor use represents a relatively small proportion of the MPWD'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.
- There are no alternative groundwater sources or local water supplies available within the MPWD service area.

In the light of these aforementioned significant impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, the MPWD 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.

In conclusion, the Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. The MPWD 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. The MPWD shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,



Tammy A. Rudock
General Manager

cc: Nicole Sandkulla, P.E., CEO/General Manager @ BAWSCA