

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
commentletters@waterboards.ca.gov

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

Dear Ms. Townsend:

Coastside County Water District ("CCWD") 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, CCWD 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 impacts of the SED proposal on the CCWD'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:

- Under drought conditions, CCWD would be forced to rely more on local surface water supplies, having 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.
- CCWD has made significant strides in water conservation in the past 10 years. Per capita water use decreased 26% from 2008 to 2015, and residential use in 2016 was 55 gallons per capita per day. This increase in water use efficiency makes further reductions more difficult and increases the impacts of water shortage.
- Based on the District's 2015 Urban Water Management Plan, this significant cut to SFPUC water supply could force CCWD to implement Stage 5 – Critical Water Shortage Emergency – of its Water Shortage Contingency Plan. In addition to a moratorium on new connections, Stage 5 imposes extreme cuts and hardship on both residential and non-residential customers in order to prioritize public health,

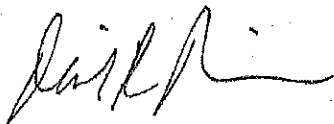
sanitation, and safety. CCWD's largest customers are water-dependent businesses (floriculture, public recreation, hotels, restaurants), many of which would be unlikely to survive with 50% of the water they currently use.

- Given the interconnected nature of the economy within the Bay Area and BAWSCA service area, CCWD 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.
- CCWD serves water to a residential population of 17,000 people and to over 600 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 the CCWD's service area.
- Since outdoor use represents a relatively small proportion of CCWD'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.

In the light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated by reference, Coastside County Water District 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. Coastside County Water District 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. CCWD shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,



General Manager
Coastside County Water District