

CITY OF SAN BRUNO
PUBLIC SERVICES DEPARTMENT

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



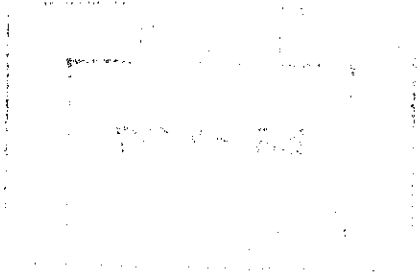
Re: Comment Letter – 2016 Bay-Delta Plan Amendment & SED

Dear Ms. Townsend:

The City of San Bruno 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 City of San Bruno 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 City of San Bruno 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 50% of its potable water supply from the San Francisco Regional Water System, water supply available to the City of San Bruno under the SED proposal could be reduced up to 50% under drought conditions for multiple consecutive years.
- Such reductions in water supply from the SFPUC may force the City of San Bruno to use more local groundwater supplies, having unknown, and potentially significant undesirable results, such as groundwater overdraft, sea water intrusion, and land subsidence, which were not adequately analyzed in the SED.



- The City of San Bruno has made significant strides in water conservation in the past 10 years. Residential per capita water use has decreased to 47 gallons per capita per day (gpcd) in 2017.
- Based on the City of San Bruno's 2015 Urban Water Management Plan, this significant cut to water supply would force the City of San Bruno to take a number of significant actions including, but not limited to, implementing a moratorium on new development in the service area, importing water, reliance on local supply, and to minimize nonessential uses of water so that water is available for human consumption, sanitation, and fire protection. The City of San Bruno would need to adjust mandatory allotments and reductions from stage 3 of our Water Shortage Contingency Plan as necessary to reach a City-wide water use reduction of 50 percent. The City may prohibit all water use except as required for public health and safety. Increased enforcement mechanisms would be instituted to enforce the stage 4 cutbacks to meet the reduction.
- Given the interconnected nature of the economy within the Bay Area and BAWSCA service area, the City of San Bruno 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.
- The City of San Bruno serves water to 10,500 residential customers and over 900 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 City of San Bruno service area.
- Since outdoor use represents a relatively small proportion of the City of San Bruno'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, the City of San Bruno 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. The City of San Bruno 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. The City of San Bruno shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jimmy Tan', with a stylized flourish extending to the right.

Jimmy Tan, P.E.
Public Services Director, City Engineer
City of San Bruno

