



**City of
Santa Clara**
The Center of What's Possible

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

City Manager's Office



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

December 23, 2016

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

Dear Ms. Townsend:

The City of Santa Clara 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 Santa Clara 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 Santa Clara 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 the City provides relevant information that the SWRCB must consider in conducting its analysis of the SED's impacts:

- As a wholesale customer of SFPUC that purchases approximately 12% of its potable water supply from the San Francisco Regional Water System, water supply available to City of Santa Clara under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- The City of Santa Clara also purchases surface water from the Santa Clara Valley Water District (SCVWD), whose imported and local supplies would also be subject to potentially significant reductions in a drought.

- Such reductions in water supply from the SFPUC may force the City of Santa Clara to use more local groundwater supplies. Since groundwater recharge is largely dependent on managed programs from SCVWD, additional groundwater pumping could have potentially significant undesirable results, such as groundwater overdraft, seawater intrusion, and land subsidence, which were not adequately analyzed in the SED.
- The City of Santa Clara has made significant strides in water conservation in the past 15 years. Residential per capita water use decreased 46% from 112 gallons per capita per day (gpcd) to 60 gpcd.
- With reductions in supply from SFPUC the City of Santa Clara will begin to run a supply deficit with demand exceeding supply starting in 2035. The availability of additional groundwater and imported water from SCVWD will be negatively impacted due to increased demands from other agencies under SED.
- Given the interconnected nature of the economy within the Bay Area and BAWSCA service area, the City of Santa Clara 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 Santa Clara serves water to more than 120,000 residential customers and over 3,000 businesses and other non-residential customers. Potential consequences of the SED proposal include health and safety concerns due to lack of potable supplies, losses in job creation, slower economic growth and delayed community development in the City of Santa Clara service area, which were not adequately analyzed in the SED.
- Since outdoor use represents a relatively small proportion of the City of Santa Clara's commercial, industrial, and institutional account water demand, these customers generally have fewer opportunities to reduce water use without changing their operations or incurring significant economic impacts.

In light of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated by reference, the City of Santa Clara requests that environmental and economic impacts of any shortage on the San Francisco Regional Water System, and the associated lost jobs and potential 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.

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

Best regards,



Rajeev Batra
Interim City Manager

cc: A. Kurotori, Assistant City Manager
G. Welling, Assistant Director-Water and Sewer Utilities

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