



# City of Millbrae

621 Magnolia Avenue, Millbrae, CA 94030

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Councilman

December 13, 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](mailto:commentletters@waterboards.ca.gov)



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

Dear Ms. Townsend:

The City of Millbrae is 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, the City of Millbrae 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 City of Millbrae 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 is 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 City of Millbrae under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.
- The City of Millbrae has made significant strides in water conservation in the past 10 years. Residential per capita water use decreased 36% from 81 gallons per capita per day (gpcd) to 52 gpcd.

- Based on the City of Millbrae 2015 Urban Water Management Plan, this significant cut to water supply could force the City of Millbrae to take a number of significant actions including, but not limited to, implementing a moratorium on new water meters and developments, evaluating sources for importing water, implementing water use reduction allocations, and prohibiting or minimizing nonessential uses of water so that water is available for human consumption, sanitation and fire protection.
- The City of Millbrae serves water to approximately 22,000 residential customers and over 300 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 Millbrae service area.
- Since outdoor use represents a relatively small proportion of the City of Millbrae'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 included in the BAWSCA and SFPUC comment letters incorporated here by reference, the City of Millbrae 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 Millbrae 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 City of Millbrae shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.

Sincerely,



Ray Chan  
Public Works Director