



Transmitted Via Email

November 8, 2017

The Hon. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Phase II Bay-Delta Plan Input from BAWSCA

Dear Chair Marcus,

The Bay Area Water Supply and Conservation Agency (BAWSCA) submits the following comments related to the State Board's notice of October 4, 2017 regarding input on the development of the program of implementation for the Phase II update of the Bay-Delta Plan. BAWSCA understands the difficult task faced by the State Board and supports the objectives of the Bay-Delta Plan and is committed to working with other stakeholders to protect water quality in the Bay-Delta for humans, fish, and other wildlife.

BAWSCA is a special district formed as a result of State legislation that has the sole authority to represent the interests of twenty-four cities and water districts and two private utilities that are long term purchasers of wholesale water from the City and County of San Francisco's (CCSF) Regional Water System (RWS), including water originating on the Tuolumne River.^[1] BAWSCA's governing board includes appointed representatives from each of its twenty-six member agencies. Through the BAWSCA member agencies, the water purchased from CCSF is redistributed to over 1.78 million people and over 40,000 businesses and community organizations in Alameda, Santa Clara and San Mateo counties. BAWSCA, the BAWSCA member agencies, and the 1.78 million customers relying on the RWS have a clear interest, individually and collectively, in a reliable water system and in the Bay-Delta Plan update.

On March 17, 2017 BAWSCA submitted comments to the *Draft Revised 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* (hereinafter referred to as "2016 Draft SED" or "SED"). BAWSCA's primary concern with Phase II development is its consistency with the Phase I process, proposed updates, and what was analyzed in the SED. There is overlap between the input sought by the State Board related to the Phase II proceedings and the same issues in Phase I. There should be consistency in the process and outcomes of Phase I and Phase II, and in the overall update of the Bay-Delta Plan.

In particular, the issue of Delta outflows raised in issues 3, 4, and 5 from the October 4, 2017 notice should be consistent with, and take into account, flows from Phase I. Likewise, flood plain inundation to benefit native species (issue 6), the structure of adaptive management (issue 7) and drought measures (issues 8, 9 and 10) have similar issues in the proposed Phase I

^[1] Wat. Code, § 81300 *et seq.*

State Water Resources Control Board

November 8, 2017

Page 2 of 2

changes, and should be considered globally to ensure consistency. Importantly, any voluntary plan incorporating cold water habitat objectives (issues 1.a. and 1.b.), non-flow measures (issue 8) and voluntary drought measures (issue 11), must consider, and be consistent with, any voluntary plan or settlement in the Phase I process addressing these issues.

Thank you for the opportunity to comment.

Sincerely,



Nicole Sandkulla

CEO/General Manager