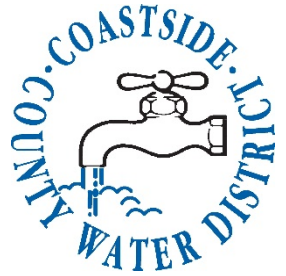


July 12, 2021



Re: Comment Letter – Draft EIR for Plan Bay Area 2050 (SCH# 2020090519)

Therese McMillan, Executive Director
MTC and ABAG
Attn: Draft EIR Comments
375 Beale Street, Suite 800
San Francisco, CA, 94105

Sent via email: eircomments@bayareametro.gov

Dear Ms. McMillan,

Coastside County Water District (“Coastside CWD”) submits the following comments to the Metropolitan Transportation Commission / Association of Bay Area Governments (MTC / ABAG) regarding the Draft Environmental Impact Report (Draft EIR) (SCH# 2020090519) for Plan Bay Area 2050 (Plan). In addition, Coastside CWD would like to incorporate by reference separate comments submitted by the Bay Area Water Supply and Conservation Agency (BAWSCA) that provide more detail about the proposed Plan’s impacts on the communities that are provided water by BAWSCA’s member agencies.

Coastside CWD is supportive of the proposed Plan’s strategies to make the Bay Area more affordable, connected, diverse, healthy, and vibrant for all Bay Area residents. Adequate potable water supply is necessary to meet these goals. However, the DEIR fails to adequately consider the impacts of the proposed Plan on the region’s water supply reliability and ability to accommodate projected increased housing water supply needs.

Specifically, the proposed Plan should:

- **Account for Phase 1 of the State Water Resources Control Board’s (State Board) San Francisco Bay/Sacramento-San Joaquin Delta Estuary Water Quality Control Plan Bay-Delta Plan (Bay-Delta Plan), which is an adopted regulation as of December 12, 2018,¹ that will directly impact Coastside CWD’s water supply during droughts.** The Bay-Delta Plan requires the

¹ https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf

release of 30-50 percent of the “unimpaired flow” on the three tributaries to the San Joaquin River from February through June, which will significantly impact water supply availability from the Tuolumne River and the San Francisco Regional Water System (RWS), Coastside CWD’s primary source of water supply. The Draft EIR fails to account for the adopted Bay-Delta Plan, the resulting impacts, and adequacy of existing water supplies to accommodate planned growth and to meet Coastside CWD’s customer needs during single and multiple dry years. As indicated on page 8-6 of the San Francisco Public Utility Commission’s (SFPUC) 2020 Urban Water Management Plan (UWMP), analysis by the SFPUC, which operates the RWS, indicates that during single dry years, there would be system-wide shortages between 30 percent and 40 percent, and during multiple dry years, there would be shortages ranging from 30 percent to 49 percent.²

- **Account for the requirements of re-licensing of the Don Pedro Reservoir on the Tuolumne River by the Federal Energy Regulatory Commission (FERC) (FERC Project Nos. 2299 and 14581) and associated Clean Water Act section 401 Water Quality Certification (WQC).** The re-licensing of the Don Pedro Reservoir by FERC may require additional water to be released from the reservoir for the preservation of aquatic species in the lower Tuolumne River, potentially affecting the dry year water supply yield of the RWS by reducing the balance of water stored in the water bank at Don Pedro Reservoir. The Final Environmental Impact Statement for the Don Pedro project was released by FERC on July 7, 2020 (FERC/EIS-0293F, July 2020).³ On January 15, 2021, the State Board released the WQC for the Don Pedro project, which includes the 40 percent unimpaired flow objective from the Bay-Delta Plan amendment, as well as additional conditions that, if incorporated into FERC licenses would severely impact RWS water supplies.⁴ In the City and County of San Francisco’s petition for reconsideration of the WQC dated February 16, 2021, data presented denotes that if the WQC were to be enacted, required rationing during single-year and extended periods of drought would range between 75 and 90 percent under present and future demand levels.⁵ These related FERC regulatory requirements will significantly reduce water supply

² SFPUC Adopted 2020 UWMP: https://www.sfpuc.org/sites/default/files/programs/local-water/SFPUC_2020_UWMP_2020_%20FINAL.pdf

³ <https://elibrary.ferc.gov/eLibrary/idmws/common/OpenNat.asp?fileID=15576184>

⁴ https://www.waterboards.ca.gov/docs/dplg_fwqc_complete_20210105.pdf

⁵ City and County of San Francisco's Petition for Reconsideration of 401 Water Quality Certification, submitted to the State Water Resources Control Board on February 16, 2021.

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availability during drought periods from the RWS, Coastside CWD's primary source of water supply. The Draft EIR fails to account for these impacts and the adequacy (or not) of existing water supplies to accommodate planned growth, and to meet Coastside CWD's customer needs during single and multiple dry years.

- **Evaluate, as part of the impact analysis, how BAWSCA member agencies, will respond to the water supply shortages.** The impact analysis should include water shortages resulting from implementation of the Bay-Delta Plan, the Don Pedro FERC re-licensing, the WQC, climate change, and subsequent environmental and economic impacts.
- **Reconsider the effectiveness of mitigation measures PUF-1 and PUF-2 to account for the drastic water supply impacts resulting from the regulatory requirements of the Bay-Delta Plan, the Don Pedro FERC re-licensing, and the WQC.** The State Water Resources Control Board intends to implement the Bay-Delta Plan in 2022. However, it is estimated that new (alternative) water supplies may take as long as 20 plus years to be in place, which will not be in time to address the water supply impacts resulting from the Bay-Delta Plan, the Don Pedro FERC re-licensing, and the WQC. And as noted in the DEIR, for Coastside CWD new or expanded infrastructure requires additional review and approval from the California Coastal Commission. Additional review and limitations on water infrastructure expansion, may easily increase the planning and permitting phase of water infrastructure on the San Mateo Coast to 30 plus years.
- **Be updated to include the current information detailed in Coastside County Water District's 2020 Urban Water Management Plan (UWMP) in the proposed Plan's water supply analysis.** This update should also reflect information regarding the adequacy of existing water supplies to accommodate planned growth and to meet Coastside CWD's customer needs during single and multiple dry years as detailed in the 2020 UWMP. The Draft EIR uses outdated information from SFPUC's 2015 UWMP. Coastside CWD's adopted 2020 UWMP can be found at [\[https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf\]](https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf).

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- As a wholesale customer of the SFPUC Coastside CWD's reliance on imported water varies year to year. On average, Coastside CWD purchases 73 percent of its potable water supply from the SFPUC RWS. Total water supply available to Coastside CWD under the adopted Bay-Delta Plan and current drought allocation methodology could result in a 59 percent shortage of water supplies to Coastside CWD customers.
- This significant cut to water supply would force Coastside CWD to take significant actions to reduce water demand, as outlined in the Coastside CWD's Water Shortage Contingency Plan, which can be found in appendix J of the [Coastside County Water District 2020 UWMP](#).
- Potential consequences of the proposed Plan include health and safety concerns due to lack of potable supplies during droughts, and major job losses during times of drought. It will also impact the recreational uses of coastal resources during times of drought.

Coastside CWD respectfully requests that the draft EIR be revised to address the concerns listed in this comment letter and be recirculated.

Sincerely,



Mary Rogren
General Manager
Coastside County Water District

Cc: Nicole Sandkulla, Chief Executive Officer and General Manager, BAWSCA