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William L. Martin

Plan Bay Area 2040

c/o Metropolitan Transportation Commission/Association of Bay Area Governments

375 Beale Street, Suite 800

San Francisco, CA 94105

(415) 778-6757

info@PlanBayArea.org

RE: Plan Bay Area 2040

Thank you for this opportunity to give my views on the current draft of Plan Bay Area 2040.

I will begin with a review of some recent events, which are highly pertinent to Plan Bay Area:

1. In June 2016, Bay Area voters approved Measure AA by a vote of 69% to 31%. This measure imposed an annual parcel tax of \$12 on Bay Area real estate to fund San Francisco Bay wetlands restoration. We can conclude from this vote that a healthy Bay-Delta estuary is important to Bay Area voters.
2. In September 2016, the State Water Resources Control Board (SWRCB) released a Draft Supplementary Environmental Document (SED) for Phase 1 of their updated Bay-Delta Plan. The Draft SED calls for a doubling of unimpaired flows through the Stanislaus, Merced and Tuolumne Rivers, the three major tributaries to the San Joaquin River. Please note that the SWRCB is following state law in releasing this update. Among other things, those laws require that state water policy regarding the San Francisco-San Joaquin Delta follow the co-equal goals of water supply reliability and ecosystem protection and restoration. The Draft proposals calls for an increase in unimpaired flows from the current approximate level of 20% to a future range of 30-50%.
3. Droughts. The most recent drought occurred from approximately 2009-2016, depending on where and how one measures it. Previous droughts have occurred throughout California's history.

In late 2017 or early 2018, the SWRCB will release its Draft SED for Phase 2 of their update to the Bay-Delta Plan. Phase 2 will include analyses and proposals for the Sacramento River and for Delta outflows. Given the SWRCB's proposals in Phase 1, it is not idle speculation that Phase 2 will also require increased flows into and through the Delta.

These events – voter-approved environmental initiatives, droughts, government-mandated increases to river flows – are risks to the Bay Area’s future water supplies. These risks are barely addressed, if at all, in the current Plan Bay Area.

Plan Bay Area needs to mandate a shift to water-neutral development. That means requiring both economic and population growth without using more water. The City of Los Angeles has been doing this for decades.

Tools for doing this include:

- more multiunit housing (apartments or condos), which have less landscaping and thus less demand for water. California can no longer afford new projects with big thirsty lawns.
- Builders can design projects or retrofit existing development to retain more rainwater on site, either with porous surfaces that allow water to soak into the ground, or with cisterns (like rain barrels) to store roof runoff for later use.
- Offsets are another tool. Some water agencies are already requiring new development to provide offsets for the added demand. An offset might involve swapping out old, inefficient toilets, or rerouting graywater from showers and laundry to landscaping rather than to the sewer.

Plan Bay Area needs to take a strong leadership position in updating the Bay Area’s collective Urban Water Management Plans.

Entrenched interests are not motivated to conserve:

- Agricultural corporations are driven by crop prices.
- Water agencies depend on customers using high levels of water to generate revenue.
- Water banks profit when drought is the worst.
- Groundwater users still aren’t fully regulated.
- Real estate developers are more interested in selling homes and apartments.

The Urban Water Management Plans used by water agencies to plan water use over five years under various scenarios must be updated to take into account these realities.

Plan Bay Area, working with other government agencies such as the City of Los Angeles, can lead by building a new model for how economic & population can be managed without new water supplies. In fact, it will have to, because there simply isn’t enough water otherwise.

Thank you.

William L. Martin