

PUBLIC WORKS DEPARTMENT

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July 20, 2021

Therese McMillan  
Executive Director  
MTC and ABAG  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
Via email: [eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov)

Dear Ms. McMillan:

The City of Mountain View (Mountain View) 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 (proposed Plan), a long-range plan for the San Francisco Bay Area. Mountain View's water service area currently supports approximately 80,000 residents and 99,000 jobs—served through more than 18,000 water service connections.

Mountain View acknowledges that the proposed Plan's goal is to make the Bay Area more affordable, connected, diverse, healthy, and vibrant for all residents, while also achieving regional greenhouse gas emissions reduction targets established by the California Air Resources Board. However, the approach taken neglects adequate consideration of the impacts of the proposed Plan on the region's water supply reliability and ability to accommodate projected increased population and housing.

Specifically, the Draft EIR 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,<sup>i</sup> that will directly impact Mountain View's water supply during droughts.** The Bay-Delta Plan requires the release of 30% to 50% 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 (Regional Water

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<sup>i</sup> [https://www.waterboards.ca.gov/plans\\_policies/docs/2018wqcp.pdf](https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf)

System), Mountain View'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 Mountain View's customer needs during single and multiple dry years. As indicated on Page 8-6 of the San Francisco Public Utilities Commission's (SFPUC) 2020 Urban Water Management Plan (UWMP), analysis by the SFPUC indicates that during single dry years, there would be systemwide shortages of 30% to 40%, and during multiple dry years, there would be systemwide shortages of 30% to 49%<sup>ii</sup>

- **Account for the requirements of relicensing 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 Don Pedro Reservoir relicensing may require additional water to be released for the preservation of aquatic species in the lower Tuolumne River, potentially affecting Regional Water System dry-year supplies by reducing the balance of SFPUC's 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).<sup>iii</sup> On January 15, 2021, the State Board released the WQC for the Don Pedro project, which includes the 40% unimpaired flow objective from the Bay-Delta Plan amendment, as well as additional conditions that, if incorporated into FERC licenses, would severely impact Regional Water System water supplies.<sup>iv</sup> These related FERC regulatory requirements will significantly reduce drought water supply availability from the Regional Water System, Mountain View's primary source of water supply. The Draft EIR fails to account for these impacts and the adequacy of existing water supplies to accommodate planned growth, and to meet Mountain View's customer needs during single and multiple dry years.
- **Evaluate, as part of the impact analysis, how the region will respond to water supply shortages** resulting from implementation of the Bay-Delta Plan, the Don Pedro FERC relicensing, the WQC (e.g., increased groundwater pumping, increased use of local surface water, tree deaths, displaced growth to areas with available water, etc.) and subsequent environmental 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**

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<sup>ii</sup> SFPUC Adopted 2020 UWMP: [https://sfpuc.org/sites/default/files/programs/local-water/SFPUC\\_2020\\_UWMP2020\\_%20FINAL.pdf](https://sfpuc.org/sites/default/files/programs/local-water/SFPUC_2020_UWMP2020_%20FINAL.pdf)

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

<sup>iv</sup> [https://www.waterboards.ca.gov/docs/dplg\\_fwqc\\_complete\\_20210105.pdf](https://www.waterboards.ca.gov/docs/dplg_fwqc_complete_20210105.pdf)

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**of the Bay-Delta Plan, the Don Pedro FERC relicensing, and the WQC.** The State 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 prevent water supply impacts resulting from the Bay-Delta Plan, the Don Pedro FERC relicensing, and the WQC.

- **Be updated to include the current information detailed in Mountain View's 2020 UWMP in the proposed Plan's water supply analysis.** The Draft EIR uses outdated information from Mountain View's 2015 UWMP. Mountain View's adopted 2020 UWMP can be found at [www.mountainview.gov/uwmp](http://www.mountainview.gov/uwmp).

As a wholesale customer of SFPUC, Mountain View purchases 87% of its potable water supply from the Regional Water System. Under the adopted Bay-Delta Plan, Mountain View's primary supply could be reduced by up to 54% in the event of a multi-year drought. This significant cut to Mountain View's main water supply would require significant response actions, including: increasing groundwater production and mandating customer demand reductions—particularly in the irrigation sector. Tree canopy, a valuable asset in Mountain View for both aesthetics and the environment, will be at risk.

Mountain View requests that these aforementioned impacts and inadequacies of the Draft EIR be addressed before any further consideration of EIR certification or Plan adoption.

Sincerely,



Dawn S. Cameron  
Public Works Director

DSC/EF/2/PSD  
703-07-20-21L

cc: Nicole Sandkulla, Bay Area Water Supply and Conservation Agency