

February 17, 2017

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814-0100

Dear Chair Marcus:

We would like to thank the State Water Resources Control Board for the opportunity to comment on the proposed Phase 1 updates to the San Francisco Bay/Sacramento-San Joaquin Delta Estuary Water Quality Control Plan. The health and productivity of the Estuary ecosystem, which these updates are intended to improve, is vitally important to the millions of people who live, work, and play in and around the Bay and Delta.

The Association of Bay Area Governments is the Council of Governments for the nine-county, 101 city Bay Area region that circles the San Francisco Bay-Delta Estuary. The Association is guided by a 38 voting member Executive Board comprised of city, town, and county elected officials.

In 2012 the Association passed Resolution No. 08-12 recognizing the important environmental and economic roles of the San Francisco Bay Delta Estuary. The Revised Draft Substitute Environmental Document, establishing flow objectives in the lower San Joaquin River, is a positive first step in achieving the first two principles that ABAG called for in Resolution No. 08-12:

Bay Delta Ecosystem. Recognize that protection and restoration of a healthy sustainable Bay-Delta ecosystem includes adequate water quality, outflow, and water supply, to support fisheries, wildlife and habitat in perpetuity.

Delta Outflows. Recognize that the Bay-Delta ecosystem has been in a state of “chronic drought” due to current water management practices, and ensure adequate Delta outflows to San Francisco Bay to support fisheries, wildlife, habitat, water quality and other beneficial uses.

As the State Water Resources Control Board completes Phase 1 and future updates to the Water Quality Control Plan, we continue to urge that the other principles outlined in Resolution No 08-12 be applied:

Regional Self-Sufficiency. Incorporate sustainable approaches for improved water supply, water quality and reliability through the overarching principle of regional self-sufficiency, linked specifically to reducing reliance on exports from the Delta and reducing the current impacts on the Bay-Delta ecosystem.

Bay Area Communities. Protect the economic viability of industry, recreation, tourism, fisheries, and agriculture, and the ongoing vitality of communities throughout and along the shoreline of the greater San Francisco Bay-Delta ecosystem.

Full Financial Disclosure. The multi-decade costs of restoring habitat in the Bay and the Delta are expected to be significant as would be the full costs associated with any new or modified water management facilities. Realistic cost estimates must be calculated and made clear to both taxpayers and ratepayers throughout California before any final decisions are made. A full cost-benefit analysis of any proposed project must cover all affected geographic areas, and adverse socio-economic impacts need to be minimized and fully mitigated by the beneficiaries of the project.

Fair Representation. Represent and include local governments in any new governance structures for the Delta.

Flood Protection. Support funding and implementation of urban and non-urban flood protection, at the appropriate level of protection, through rehabilitation and restoration of wetlands wherever feasible, and improvement and maintenance of flood control levees and structures where necessary.

In an effort to achieve these principles and strike a balance between beneficial uses, ABAG acknowledges the voluntary settlement conversations currently underway and supports reasonable time for these settlements to be developed.

The ABAG Executive Board wishes to recognize three speakers who presented on the complexity of the update with elegance at our February 16th Executive Board meeting:

Leslie F. Grober, Deputy Director for Water Rights, State Water Resources Control Board;

Steven Ritchie, Assistant General Manager of the Water Enterprise, San Francisco Public Utilities Commission;

Peter Drekmeier, Policy Director, Tuolumne River Trust.

