



May 24, 2021

Vincent Gin
Deputy Operating Officer
Water Supply Division
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

Subject: Valley Water's 2020 Urban Water Management Plan – BAWSCA Comments

Dear Mr. Gin,

The Bay Area Water Supply and Conservation Agency (BAWSCA) appreciates the opportunity to provide public comment on the Santa Clara Valley Water District (Valley Water) Draft 2020 Urban Water Management Plan (UWMP). BAWSCA represents the interests of the 26 cities and water agencies in San Mateo, Santa Clara, and Alameda Counties that purchase approximately two thirds of their water from the San Francisco Public Utilities Commission (SFPUC). Eight BAWSCA member agencies lie in Santa Clara County and have a relationship with and/or are provided water by Valley Water.

The SFPUC's Draft 2020 UWMP¹ assumes the Bay-Delta Plan Amendment, as adopted in 2018, will be fully implemented in 2023. Under this scenario, the SFPUC's supply reliability modeling shows system-wide shortages between 30 and 49 percent in single and multiple dry years. These shortages translate to cutbacks between 36 and 54 percent to the SFPUC's wholesale customers. If such cutbacks occur, the cities and water agencies that also rely on Valley Water will most likely request to increase their purchases from Valley Water or increase groundwater pumping to meet demand.

BAWSCA requests that Valley Water's 2020 UWMP acknowledge this possible scenario by modifying the following paragraph from Chapter 6 as follows:

*Retailers with SFPUC contracts currently use less than their Individual Supply Guarantees and are projected to increase their use of this source of supply. The SFPUC normal year supply projection in Table 6-1 is based on projections by SFPUC wholesale customers. These projections do not account for potential decreases in supply allocations by the SFPUC during dry years. The total supply projection increases modestly through the planning horizon and remains below the sum of Individual Supply Guarantees for the county. **If SFPUC supplies available to its wholesale customers are cut back significantly, the retailers with SFPUC contracts may request increase their use of Valley Water supplies or increase groundwater pumping.***

Thank you for considering this request. Please contact Tom Francis, Water Resources Manager, at tfrancis@bawasca.org with any questions.

¹ SFPUC Draft 2020 UWMP: <https://www.sfpuc.org/sites/default/files/documents/UWMP%20Public%20Review%20Draft%2004012021%20FINAL.pdf>

Mr. Vincent Gin
May 24, 2021
Page 2 of 2

Sincerely,



Nicole Sandkulla
CEO/General Manager

cc: Jing Wu, Valley Water
Samantha Greene, Valley Water
Metra Richert, Valley Water
BAWSCA Board of Directors
BAWSCA Water Management Representatives
Allison Schutte, Hanson Bridgett