

## Lockey, Heather@CNRA

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**From:** Tegio, Mark <MTegio@sdcwa.org>  
**Sent:** Thursday, March 15, 2018 4:53 PM  
**To:** CEQA Guidelines@CNRA  
**Cc:** NMcGinnis@sandiego.gov; troy@sdcwa.org; Chadwick, Don  
**Subject:** Proposed Guidelines Amendments  
**Attachments:** Letter on CEQA Guidelines re Water Supply Analysis-signed.pdf

Please accept the San Diego County Water Authority's comments, in the attached pdf file, on the proposed CEQA Guidelines amendments.

Thank you,

*Mark V. Tegio, Sr.*  
Sr. Water Resources Specialist



**San Diego County Water Authority**

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# San Diego County Water Authority

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March 15, 2018

Mr. Christopher Calfee  
Deputy Secretary and General Counsel  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, California 95814

VIA E-MAIL

CEQA.Guidelines@resources.ca.gov

MEMBER AGENCIES

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- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
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- Lakeside Water District
- Olivenhain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
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- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
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- Yuima Municipal Water District

OTHER REPRESENTATIVE

County of San Diego

Re: Proposed Guidelines Amendments: §15155 Water Supply Analysis

Dear Mr. Calfee:

The San Diego County Water Authority (Water Authority) has some concern about some of the proposed amendments regarding water supply analysis found in §15155. While the Water Authority supports the renewed emphasis on long term planning for water supplies, and the addition of language to accurately identify water supply sources into the future and the associated environmental impacts, we suggest the analysis of water supply be made consistent with Water Code §10910(c)(4) and local management plans, which require a 20-year threshold for supply forecasting. Our concern is the proposed revisions may be interpreted to imply forecasting may be required beyond this threshold (i.e., the life of all phases of a project), which is outside the mandated scope of Urban Water Management Plans, and therefore cannot be reasonably foreseeable.

The Water Authority provides the following recommended edits to Section 15155(f):

(f) The degree of certainty regarding the availability of water supplies will vary depending on the stage of project approval. A lead agency should have greater confidence in the availability of water supplies for a specific project than might be required for a conceptual plan (i.e., general plan, specific plan). An analysis of water supply in an environmental document may incorporate by reference information in a water supply assessment, urban water management plan, or other publicly available sources. The analysis shall include the following:

- (1) Sufficient information regarding the project’s proposed water demand and proposed water supplies to ~~permit~~ allow the lead agency to evaluate ~~the pros and cons of~~ supplying the amount of water that the project will need during the 20-year projection under Water Code section 10910(c)(4).
- (2) An analysis of the reasonably foreseeable environmental impacts of supplying water ~~throughout the life of all phases of~~ for the project during the 20-year projection under Water Code section 10910(c)(4).

*A public agency providing a safe and reliable water supply to the San Diego region*

Mr. Christopher Calfee

March 15, 2018

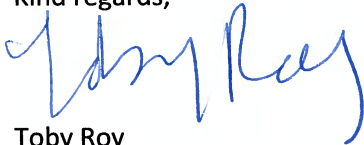
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(3) An analysis of circumstances affecting the likelihood of the water's availability during the 20-year projection under Water Code section 10910(c)(4), as well as the degree of uncertainty involved. Relevant factors may include but are not limited to, drought, saltwater intrusion, regulatory or contractual curtailments, and other reasonably foreseeable demands on the water supply.

(4) If the lead agency cannot determine that a particular water supply will be available, it may consider alternative sources and an analysis of the ~~shall conduct an analysis of alternative sources, including at least in general terms the environmental consequences of using those alternative sources, or alternatives to the project that could be served with available water.~~

We appreciate your attention to this matter. If you have any questions, please do not hesitate to contact me at (858) 522-6743 or TRoy@sdewa.org.

Kind regards,



Toby Roy  
Water Resources Manager