SUPPLEMENTAL RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

SFPUC Alameda Creek Recapture Project

Volume 5

PLANNING DEPARTMENT
CASE NO. 2015-004827ENV
STATE CLEARINGHOUSE NO. 2015062072
APRIL 1, 2020

Draft EIR Publication Date:	November 30, 2016
Draft EIR Public Hearing Date:	January 5, 2017
Draft EIR Public Comment Period:	November 30, 2016 — January 30, 2017
Responses to Comments Publication Date:	June 7, 2017
Final EIR Certification Hearing Date:	June 22, 2017
Board of Supervisors Action Reversing Certification:	September 19, 2017
Publication Date of Recirculated Portions of Draft EIR:	December 4, 2019
Public Hearing Date on Recirculated Portions of Draft EIR:	January 9, 2020
Comment Period on Recirculated Portions of Draft EIR:	December 5, 2019 — January 21, 2020
Supplemental Responses to Comments Publication Date	April 1, 2020
Final EIR Certification Date	April 16, 2020

SAN FRANCISCO
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	Final EIR Certification Date	April 16, 2020

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CHAPTER 16

Introduction to Supplemental Responses to Comments

16.1 Purpose of the Supplemental Responses to Comments Document

This Supplemental Responses to Comments document is Volume 5 of the environmental impact report (EIR) on the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project (ACRP or proposed project). It contains written responses to comments on the Recirculated Portions of the Draft EIR (Volume 4) published by the San Francisco Planning Department on December 4, 2019. The comments were submitted to the planning department during the public review period from December 5, 2019 through January 21, 2020, either in writing or in public testimony during the public hearing on January 9, 2020. The purpose of this document is to complete the Final EIR on the ACRP in compliance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code sections 21000 et seq.), CEQA Guidelines (California Code of Regulations, Title 14, sections 15000 et seq.), and San Francisco Administrative Code Chapter 31.

The San Francisco Planning Department, as lead agency responsible for administering the environmental review for projects under the jurisdiction of the City and County San Francisco, published the Draft EIR (Volumes 1 and 2) on the proposed project on November 30, 2016, and the Responses to Comments document (Volume 3) on June 7, 2017. With the addition of Volumes 4 and 5 — which augments and in some cases supersedes portions of Volumes 1, 2, and 3 — the Final EIR on the SFPUC's ACRP is now comprised of Volumes 1 through 5, consistent with CEQA Guidelines section 15132. See Section 16.4, below, for a description of the overall contents and organization of the Final EIR on the ACRP.

This Supplemental Responses to Comments document contains the following: (1) a list of persons, organizations, and public agencies commenting on the Recirculated Portions of the Draft EIR; (2) copies of comments received on the Recirculated Portions of the Draft EIR; (3) written responses to those comments; and (4) revisions to the Recirculated Portions of the Draft EIR to clarify or correct information in that document.

The ACRP is a component of the SFPUC's Water System Improvement Program (WSIP), which the SFPUC adopted in 2008, and the ACRP EIR is a project-level EIR that tiers off of the WSIP

Program EIR[1] in accordance with CEQA Guidelines section 15168(c). The Final EIR has been prepared in compliance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. It is an informational document for use by (1) governmental agencies and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding their potentially significant impacts; and (2) the SFPUC prior to making a decision to approve, disapprove, or modify the proposed project. If the SFPUC approves the proposed project, CEQA requires that the SFPUC adopt the CEQA findings as well as the ACRP Mitigation Monitoring and Reporting Program (MMRP) to ensure that mitigation measures identified in the Final EIR will be implemented as part of the project. See Section 16.2, below, for further description of the environmental review process.

16.2 Environmental Review Process

The environmental review process for the ACRP EIR complies with CEQA Guidelines sections 15080 through 15090, and it includes multiple phases involving notification and input from responsible agencies and the public. The process is summarized in this section, and the reader is referred to the more detailed descriptions of each phase of the ACRP environmental review process that are included in: Volume 1, Chapter 2; Volume 3, Chapter 9; and Volume 4, Chapter 13.

16.2.1 Chronology of ACRP CEQA Process

The chronology of events constituting the environmental review process for the ACRP EIR are summarized in **Table 16-1** below, which updates Table 13-1 in Chapter 13 of the recirculated portions of the Draft EIR.

16.2.2 June 2017 EIR and Appeal

As shown in Table 16-1, the San Francisco Planning Department initiated the ACRP environmental review process on June 24, 2015 by issuing a Notice of Preparation (NOP) to governmental agencies, organizations, and persons interested in the proposed project, followed by conducting a public scoping meeting on July 9, 2015. On November 30, 2016, the planning department published the Draft EIR (Volumes 1 and 2), and circulated it to local, state, and federal agencies and to interested organizations and individuals. The planning department then conducted a public hearing to receive oral comments on the Draft EIR on January 5, 2017. On June 7, 2017, the planning department published the Responses to Comments document (Volume 3) that provided written responses to all substantive comments received on the Draft EIR. Two weeks later, on June 22, 2017, the San Francisco Planning Commission found the Final EIR (which at that time consisted of Volumes 1, 2, and 3, and is referred to hereinafter as the "June 2017 EIR") to be adequate, accurate, and objective and certified it in compliance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

[1] San Francisco Planning Department, *San Francisco Public Utilities Commission's Water System Improvement Program, Final Program Environmental Impact Report*, File No. 2005.0159E, State Clearinghouse No. 2005092026, Certified October 30, 2008. Available online at http://www.sf-planning.org/index.aspx?page=1829.

TABLE 16-1
SUMMARY OF ACRP EIR CEQA PROCESS

CEQA Process	Date	Location
Original Draft EIR		
Notice of Preparation, publication	June 24, 2015	—
EIR Scoping Period	June 24, 2015 to July 27, 2015	—
EIR Scoping Meeting	July 9, 2015	Sunol, CA
Draft EIR, publication	November 30, 2016	—
Draft EIR Public Review Period	November 30, 2016 to January 30, 2017	—
Public Hearing on Draft EIR	January 5, 2017	San Francisco, CA
Responses to Comments Document on Original Draft EIR		
Responses to Comments Document, publication	June 7, 2017	—
EIR Certification Hearing on the Final EIR before the San Francisco Planning Commission	June 22, 2017	San Francisco, CA
San Francisco Planning Commission Motion No. 19952 certifying the Final EIR	June 22, 2017	
EIR Appeal		
Appeal Letter from Alameda County Water District	July 24, 2017	—
Appeal Hearing before the San Francisco Board of Supervisors	September 5, 2017	San Francisco, CA
San Francisco Board of Supervisors Motion No. M17-148 reversing the Planning Commission's certification	September 19, 2017	
Recirculated Portions of the Draft EIR		
Agency Scoping Meeting on recirculated portions of the Draft EIR	October 3, 2017	Santa Rosa, CA
Notice of Preparation of recirculated portions of the Draft EIR, publication	October 18, 2017	—
Scoping Period, recirculated portions of the Draft EIR	October 18, 2017 to December 6, 2017	—
Scoping Meeting, recirculated portions of the Draft EIR	December 6, 2017	San Francisco, CA
Agency Coordination Meeting on recirculated portions of the Draft EIR	May 30, 2018	Santa Rosa, CA
Presentation to the Alameda Creek Fisheries Restoration Workgroup	September 12, 2019	Livermore, CA
Recirculated portions of the Draft EIR, publication	December 4, 2019	—
Public Review Period on the recirculated portions of the Draft EIR	December 5, 2019 to January 21, 2020	—
Public Hearing on recirculated portions of the Draft EIR	January 9, 2020	San Francisco, CA
Supplemental Responses to Comments on Recirculated Portions of the Draft EIR and Final EIR		
Supplemental Responses to Comment Document on Recirculated Portions of the Draft EIR, publication	April 1, 2020	—
Final EIR Certification Hearing	April 16, 2020	San Francisco, CA

On July 24, 2017, the Alameda County Water District (ACWD) filed an appeal to the San Francisco Board of Supervisors requesting that the Board overturn the certification of the June 2017 EIR. The major points in the ACWD appeal related to the analysis of impacts of project operations on steelhead fish in Alameda Creek. On September 19, 2017, the San Francisco Board of Supervisors adopted findings reversing the certification of the June 2017 EIR and directed the planning department to provide additional information and analysis to determine whether the proposed project would result in operational impacts on steelhead fish in the lower watershed as a result of project-induced effects on streamflow in Alameda Creek. The Board also directed that in conducting such additional environmental analysis, the planning department enlist an independent third-party expert to review the groundwater/surface water analysis used in the EIR to determine if the analysis adequately and accurately supports the fisheries impact analysis as required by CEQA. The Board determined that with respect to all other issues, the June 2017 EIR is adequate, accurate, and objective, and no further analysis is required.

16.2.3 Recirculated Portions of the Draft EIR

On December 4, 2019, the planning department published the Recirculated Portions of the Draft EIR (Volume 4) in fulfillment of the Board of Supervisors' resolution and consistent with CEQA Guidelines section 15088.5. The Recirculated Portions of the Draft EIR presented the revisions to portions of the project description, revisions to portions of the impact analysis, and results of the third party review of the groundwater/surface water analysis. The planning department then conducted a public hearing to receive oral comments on the Recirculated Portions of the Draft EIR on January 9, 2020. A court reporter present at the public hearing transcribed the oral comments verbatim and prepared a written transcript. See Appendix PH2 of this Supplemental Responses to Comments document for the public hearing transcript. During the public review period on the Recirculated Portions of the Draft EIR from December 5, 2019 through January 21, 2020, the planning department received comments from two public agencies, and these comments are reproduced in Appendix COM2. Section 16.3, below, lists the names and agencies of persons commenting on the Recirculated Portions of the Draft EIR.

16.2.4 Supplemental Responses to Comments Document and Final EIR

On April 1, 2020, the planning department published this Supplemental Responses to Comments document (Volume 5) and distributed it for review to the San Francisco Planning Commission and to those persons who submitted comments on the Recirculated Portions of the Draft EIR, in compliance with CEQA Guidelines section 15088. The planning commission will hold a public hearing on April 16, 2020 at San Francisco City Hall to consider the adequacy of the Final EIR (now comprised of Volumes 1 through 5) in complying with the requirements of CEQA. If the planning commission finds that the Final EIR complies with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, the commission will then certify the Final EIR.

If the Final EIR is certified, the SFPUC will then review and consider the certified Final EIR before making a decision to approve the proposed project. If the SFPUC decides to approve the project, it will adopt CEQA findings, including adopting or rejecting mitigation measures and alternatives to

avoid or reduce significant impacts, and a mitigation monitoring and reporting program (MMRP) (CEQA Guidelines sections 15091 and 15092). Consistent with CEQA Guidelines section 15097, the MMRP is a program designed to ensure implementation of the mitigation measures identified in the Final EIR to reduce or avoid the project's significant environmental effects, and which the SFPUC has adopted as part of the conditions of project approval.

Because the ACRP EIR does not identify any significant adverse impacts that cannot be mitigated to less-than-significant levels, the project approval findings for this project will not need to include a statement of overriding considerations if identified mitigation measures or alternatives are adopted that mitigate all significant effects (CEQA Guidelines section 15093[b]).

16.3 List of Persons Commenting

Table 16-2 is a complete list of the persons who submitted comments on the Recirculated Portions of the Draft EIR. For each commenter, Table 16-2 identifies the person's name, agency, comment format, comment date, and the first part of the comment code. All comments are coded the same way as was done for responses to comments on the Draft EIR in Volume 3 of the ACRP EIR. For each comment letter (or public hearing transcript of an oral comment), this document assigns a unique comment code for each comment on a separate topic in order to facilitate cross-referencing of the written responses with the comment letter in Chapter 17. The bracketed comments and corresponding comment codes are shown in the margins of the comments in Appendices COM2 and PH2 of this document.

TABLE 16-2
PERSONS COMMENTING ON THE RECIRCULATED PORTIONS OF THE ACRP DRAFT EIR

Comment Code	Name of Person and Agency Submitting Comments	Comment Format	Comment Date
Public Agencies			
A-ACWD3	Robert Shaver, General Manager, Alameda County Water District	Letter	12/18/2019
A-ACWD4	Robert Shaver, General Manager, Alameda County Water District	Letter	12/31/2019
A-ACWD5	Robert Shaver, General Manager, Alameda County Water District	Letter	01/02/2020
A-ACWD6	Robert Shaver, General Manager, Alameda County Water District	Letter	01/21/2020
A-Zone7	Elke Rank, Alameda County Flood Control and Water Conservation District, Zone 7	Letter	01/21/2020
Public Hearing Comments			
PH-Hidas	Laura Hidas, Manager of Water Resources, Alameda County Water District	Transcript	01/09/2020
PH-Fung	Commissioner Frank Fung	Transcript	01/09/2020

As shown in Table 16-2, the Alameda County Water District submitted four comment letters on the Recirculated Portions of the Draft EIR, which are coded as A-ACWD3, A-ACWD4, A-ACWD5, and A-ACWD6 in this document. This is because the district previously submitted two comment letters on the Draft EIR, which are coded as A-ACWD1 and A-ACWD2 in Volume 3, and responses to the comments in those letters are included in that same volume. This coding system ensures that all comments in the Final EIR have a unique code.

16.4 Final EIR Document Organization

The overall organization and content of the Final ACRP EIR is summarized below.

Volume 1, Original Draft EIR, published November 30, 2016

- **Chapter 1, Summary.** This chapter presents a summary of the project as proposed as of November 2016, includes a table of all environmental impacts and mitigation measures, and describes the alternatives considered in this EIR. It also addresses areas of controversy and issues to be resolved.
- **Chapter 2, Introduction and Background.** This chapter provides project background information and describes the purpose and organization of the EIR, as well as the environmental review process.
- **Chapter 3, Project Description.** This chapter describes the project as proposed as of November 2016, including the project objectives, project components, project construction, and project operations. The chapter also lists required permits and approvals. Please see Volume 4, Chapter 14, for the updated portions of the project description.
- **Chapter 4, Plans and Policies.** This chapter describes applicable land use plans and policies and their relevance to the project, and then discusses the project's consistency with those plans.
- **Chapter 5, Environmental Setting, Impacts, and Mitigation Measures.** This chapter is divided into sections covering each environmental resource topic. Each section describes the environmental and regulatory setting, the criteria used to determine impact significance, and the approach to the analysis for that resource topic. The section then presents an analysis of potential environmental impacts and the project-specific mitigation measures that have been developed to address significant and potentially significant impacts. Each resource section also includes an evaluation of cumulative impacts with respect to that resource topic. The criteria used to determine the significance of project impacts are based primarily on the San Francisco Planning Department's Initial Study Checklist,[2] which in turn, is based on CEQA Guidelines Appendix G. In order to address the specific hydrologic issues pertinent to the ACRP, the Planning Department included one additional criterion to address the potential for ACRP operations to affect downstream water users in a manner that would result in adverse environmental effects. This chapter contains the following sub-sections and environmental resource topics:

[2] San Francisco Planning Department, 2015. *Environmental Review Guidelines, Appendix B: Initial Study Checklist.* Revised August 10, 2015.

5.1 Impact Overview	5.11 Recreation
5.2 Land Use	5.12 Utilities and Service Systems
5.3 Aesthetics	5.13 Public Services
5.4 Population and Housing	5.14.1 Terrestrial Biological Resources
5.5 Cultural Resources	5.14.5 Fisheries Resources
5.6 Transportation and Circulation	5.15 Geology and Soils
5.7 Noise and Vibration	5.16 Hydrology and Water Quality
5.8 Air Quality	5.17 Hazards and Hazardous Materials
5.9 Greenhouse Gas Emission	5.18 Mineral and Energy Resources
5.10 Wind and Shadow	5.19 Agriculture and Forestry Resources

Please also see Volume 4, Chapter 15, Recirculated Portions of Environmental Setting, Impacts, and Mitigation Measures, for updated portions of selected analyses.

- **Chapter 6, Other CEQA Issues.** This chapter discusses growth-inducing effects, summarizes the cumulative impacts, identifies the significant environmental effects that cannot be avoided if the proposed project is implemented, and describes the significant irreversible impacts.
- **Chapter 7, Alternatives.** This chapter describes the alternatives to the proposed project and compares their impacts to those of the proposed project. This chapter also identifies the environmentally superior alternative and summarizes the alternatives that were considered but screened from further analysis.
- **Chapter 8, EIR Authors and Consultants.** This chapter lists the EIR authors, consultants, project sponsors, and organizations and persons consulted.

Volume 2, Appendices to Original Draft EIR, published November 30, 2016

- **Draft EIR Appendices.**
  - **Appendix NOP.** Notice of Preparation and Scoping Report for November 2016 publication. See Volume 4, Appendix NOP2 for the Notice of Preparation for Recirculated Portions of the EIR.
  - **Appendix WSIP.** WSIP PEIR Mitigation Measures, Applicability to the Proposed Project
  - **Appendix AQ.** Emissions Calculations for Air Quality and Greenhouse Gas Emissions Analyses
  - **Appendix BIO1.** Terrestrial Biological Resources Supporting Documentation
  - **Appendix BIO2.** Alameda Creek Fisheries Habitat Assessment Report. See Volume 4, Appendix BIO2-R for updates to this report.
  - **Appendix HYD1.** Surface Water Hydrology Report. See Volume 4, Appendix HYD1-R for the revised version of this report.

- **Appendix HYD2.** Groundwater/Subsurface Water Interactions Technical Memorandum. See Volume 4, Appendix HYD2-R for the revised version of this report.

Volume 3, Responses to Comments document, published June 7, 2017

- **Chapter 9, Introduction to Responses to Comments.** This chapter describes the purpose of the Responses to Comments document, the environmental review process, and the organization of the entire EIR.
- **Chapter 10, List of Persons Commenting.** This chapter lists the persons, agencies, and organizations that submitted comments on the Draft EIR and describes the coding and organization of comments.
- **Chapter 11, Responses to Comments.** This chapter presents the substantive comments received on the Draft EIR together with responses to those comments. The comments and responses in this chapter are organized by topic, covering several of the environmental topics addressed in Chapter 5 of the EIR. Similar comments on the same topic received from multiple commenters are grouped together, for which a single comprehensive response is provided.
- **Chapter 12, Draft EIR Revisions.** This chapter presents changes and revisions to the Draft EIR. The Planning Department has made changes and revisions to the Draft EIR either in response to comments received on the Draft EIR and/or as necessary to clarify statements and conclusions made in the Draft EIR. In all cases, changes are provided to clarify or correct content in the Draft EIR or to add information received after the release of the Draft EIR. None of the changes and revisions in Chapter 12 affect the analysis or conclusions presented in the Draft EIR.
- **Responses to Comments Appendices.**
  - **Appendix COM**. Written Comments on November 2016 Draft EIR, Coded
  - **Appendix PH.** Public Hearing Transcripts from January 5, 2017 hearing, Coded

Volume 4, Recirculated Portions of the Draft EIR, published December 4, 2019

- **Chapter 1A, Summary of Recirculated Portions of the EIR.** As required by CEQA Guidelines section 15088.5, this chapter summarizes the revisions made to the previously circulated Draft EIR using the same format as the previous summary. It includes a summary table of all impacts and mitigation measures discussed in the Recirculated Portions of the Draft EIR. This chapter augments and supersedes portions of EIR Volume 1, Chapter 1, Summary.
- **Chapter 13, Introduction to Recirculated Portions of the EIR.** This chapter explains the purpose of the recirculated portions of the EIR, and it includes summaries of all comments made during the appeal process relevant to the recirculated portions of the EIR as well as during the scoping period for the recirculated portions of the EIR. For each comment, this chapter directs the reader to the section of the EIR that addresses the comment.
- **Chapter 14, Revisions to Project Description.** This chapter describes the changes in proposed project operations that the SFPUC developed subsequent to and in response to

the appeal process. It replaces and supersedes Section 3.6, Project Operations, in EIR Volume 1, Chapter 3.

- **Chapter 15, Recirculated Portions of Environmental Setting, Impacts, and Mitigation Measures.** This chapter augments and supersedes portions of Chapter 5 in EIR Volume 1. As directed by the San Francisco Board of Supervisors, it specifically addresses operational impacts on steelhead fish in the lower watershed as a result of project-induced effects on streamflow in Alameda Creek. This chapter also addresses the impacts, if any, of the revisions to the project description on the resource topics analyzed in EIR Chapter 5.

- **Appendices.** Supporting appendices for the recirculated portions of the EIR include the following:

  - **Appendix BOS**. San Francisco Board of Supervisors Motion Regarding Recirculation
  - **Appendix APC**. Appeal Process Comments Related to Steelhead Impacts
  - **Appendix NOP2.** Notice of Preparation for Recirculated Portions of the EIR, Scoping Comments, and Public Hearing Transcripts
  - **Appendix TPR**. Third Party Review of the Groundwater/Surface Water Analysis Used in the EIR
  - **Appendix ACFRW**. Alameda Creek Fisheries Restoration Meeting, September 12, 2019
  - **Appendix BIO2-R**. Revised Alameda Creek Fisheries Habitat Assessment Report (updates Appendix BIO2 in EIR Volume 2)
  - **Appendix HYD1-R**. Revised Surface Water Hydrology Report (replaces and supersedes Appendix HYD1 in EIR Volume 2)
  - **Appendix HYD2-R**. Revised Groundwater/Surface Water Interactions (replaces and supersedes Appendix HYD2 in EIR Volume 2)

Volume 5, Supplemental Responses to Comments document, published April 1, 2020

- **Chapter 16, Introduction to Supplemental Responses to Comments Document.** This chapter explains the purpose of this document, summarizes the environmental review process, and describes the Final EIR that now includes the recirculated portions of the EIR. It provides a list of all persons and agencies that submitted comments on the recirculated portions of the EIR.

- **Chapter 17, Responses to Comments on the Recirculated Portions of the Draft EIR.** Similar to Chapter 11 in Volume 3, this chapter presents written responses to all substantive comments received on the Recirculated Portions of the Draft EIR. The responses are organized by topic, with all comments coded to facilitate cross-referencing to the source of the comment.

- **Chapter 18, Revisions to Recirculated Portions of the Draft EIR.** Similar to Chapter 12 in Volume 3, this chapter provides presents changes and revisions to the Recirculated Portions of the Draft EIR. The Planning Department has made changes and revisions to the Recirculated Portions of the Draft EIR either in response to comments received and/or as

necessary to clarify statements made in the Draft EIR. In all cases, changes are provided to clarify or correct content in the Recirculated Portions of the Draft EIR. None of the changes and revisions in Chapter 18 affect the analysis or conclusions presented in the Recirculated Portions of the Draft EIR.

- **Supplemental Responses to Comments, Appendices.**
  - **Appendix COM2.** Written Comments on the Recirculated Portions of the Draft EIR, Coded
  - **Appendix PH2.** Public Hearing Transcripts from January 9, 2020 hearing, Coded

CHAPTER 17
Supplemental Responses to Comments

17.1 Introduction

This chapter presents the written responses prepared by the San Francisco Planning Department to the substantive comments received on the Recirculated Portions of the Draft EIR on the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project (ACRP or proposed project). It supplements the responses to comments contained in Volume 3, Chapter 11, and like that chapter, it is organized by topic, with comments on the same topic grouped together followed by a comprehensive response on that topic.

As stated in Volume 3, Chapter 11, substantive comments are those comments that relate to the proposed project, the adequacy or accuracy of the EIR, or the environmental review process, and do not include comments such as a description of an agency or organization's mission or a reiteration of the ACRP project description. All comments and written materials submitted during the public review period, however, are considered by the planning department and are provided to the decision-makers for their consideration. The substantive comments contained in the letters and public hearing transcript have been bracketed and numbered, as shown in Appendices COM2 and PH2 in the margins of the letters and hearing transcript, and are also reproduced in this chapter.

The topic codes and corresponding response codes used in this chapter also follow the same format used in Chapter 11. For example, for topics related to the environmental review process, Chapter 11, Section 11.2 addressed topic codes ERP-1 through ERP-8, so this chapter continues the same sequential numbering such that the first comment on the Recirculated Portions of the Draft EIR related to the environmental review process is addressed in this chapter under topic code ERP-9 and under response ERP-9. The topics addressed in this chapter are as follows:

17.2 Environmental Review Process (ERP)
17.3 Project Description (PD)
17.4 Hydrology (HY)

As appropriate, the responses also provide clarification of the information presented in the Recirculated Portions of the Draft EIR and may also include revisions or additions to that text. Revisions to the Recirculated Portions of the Draft EIR are shown as indented text. New or revised text is <u>underlined</u>; deleted material is shown in strikethrough (~~strikethrough~~). Chapter 18 of this document presents all changes and revisions to the Recirculated Portions of the Draft EIR, including those made as part of a response to comments.

17.2 Environmental Review Process (ERP)

The comments and corresponding responses in this section address comments related to the environmental review process. This section responds to comments on the following topics, which follows the sequential numbering of Responses ERP-1 through ERP-8, which were included in Volume 3, Section 11.2:

- ERP-9: Data Request
- ERP-10: Updated Contact Information

17.2.1 Data Request (ERP-9)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-ACWD3-1

---

1. "As indicated in the Board of Supervisors' motion (Appendix BOS) the purpose of the REIR is to further analyze how the proposed project would affect low flow levels in Alameda Creek, with specific regard to impacts on steelhead. In order to determine the sufficiency of the analysis, it is necessary to review the daily flow data from the modeling.

   Accordingly, ACWD is requesting the daily data from the post-processed ASDHM, as described in HYD1-R, Section 4, Analytical Methods of the recirculated portions of the draft. We would like to receive the data as soon as possible, to aid in our timely review of the recirculated EIR.

   Specifically, we would like data from all five (5) of the scenarios described in the recirculated portions of the draft EIR:

   - Pre-2001 conditions
   - Existing conditions
   - with the Calaveras Dam Replacement Project (with CDRP)
   - CDRP with ACRP ("With-Project")
   - CDRP BO

   Please include in the data, at a minimum, the following data for each of the daily times steps in the modeled period:

   - The flow at each modeled node in ASDHM, as post-processed
   - The flow to Pit F-2
   - Pit F-2 elevation
   - Pit F-2 storage
   - ACRP pumping rate
   - Volume of bypassed and released water available for recapture (as described in Section 14.3.1.1. This volume is limited by unused storage capacity in Calaveras Reservoir)
   - Accounting of water credits and withdrawals (as described in Section 14.3.1.2) (if different from above)"

   (*Robert Shaver, General Manager, Alameda County Water District, letter, December 18, 2019 [A-ACWD3-1]*)

Response ERP-9: Data Request

The commenter is requesting data to aid in ACWD's review of the analysis in the Recirculated Portions of the Draft EIR. The San Francisco Planning Department maintains copies of all reference materials and data used in the ACRP EIR analysis, any and all of which is available for review at the planning department, 1550 Mission Street, Suite 400, San Francisco, California under Case No. 2015-004827ENV.

In specific response to this request, the planning department responded directly to the commenter by email on December 19, 2019, January 9, 2020, and January 16, 2020[1] and has provided the available requested data to ACWD.

17.2.2 Updated Contact Information (ERP-10)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-Zone7-6

"In an effort to ensure that mailed notices and referrals from your agency make their way to the appropriate staff at Zone 7 in a timely manner, we are requesting that your databases / mailing lists are updated to reflect the following points of contact, specifically for routine development referrals and for CEQA / environmental reviews."

CEQA / environmental review:	**For development review / referral:**
Zone 7 Water Agency **Attn: CEQA Review / Elke Rank** 100 North Canyons Parkway Livermore, CA 94551 ceqa@zone7water.com Staff contact: Elke Rank, erank@zone7water.com	Zone7 Water Agency **Attn: Dev Referral / Steven Ellis** 100 North Canyons Parkway Livermore, CA 94551 reviewers@zone7water.com Staff contact: Steven Ellis, sellis@zone7water.com

(*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-6]*)

Response ERP-10: Updated Contact Information

In response to this request to update contact information, the San Francisco Planning Department has updated the CEQA files for ACRP to reflect this information. The planning department has also forwarded this information to the SFPUC for their use in communicating with the Zone 7 Water Agency.

[1] Chris Kern, Principal Planner, San Francisco Planning Department. Emails to Robert Shaver and Gina Markou regarding Alameda Creek Recapture Project, dated December 19, 2019, January 6, 2020, and January 16, 2020.

17.3 Project Description (PD)

The comments and corresponding responses in this section address topics related to the revisions to the project description, which are discussed in Chapter 14 of the Recirculated Portions of the Draft EIR. This section responds to comments on the following topics:

- PD-1: Revised Project Description
- PD-2: Additional Monitoring Requirements
- PD-3: Additional Changes to the Project Description

17.3.1 Revised Project Description (PD-1)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-ACWD4-1

"We at the Alameda County Water District are continuing our analysis of the Recirculated EIR (REIR) for the proposed Project. Based on this analysis of the updates in the REIR, the changed Project description and operating parameters describe a Project that is more protective of steelhead and downstream water supplies than the previously proposed Project, provided that SFPUC fully complies with the project description and operating protocols set forth in the REIR.

Section 14.1.1 on page 14-2 of the REIR restates that:

> Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. SFPUC would recover water that passively percolates or seeps into Pit F2. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.
>
> The key objectives of the ACRP are: (1) to recapture the water that would have otherwise been stored in Calaveras Reservoir due to the release and bypass of flows from Calaveras Dam and the ACDD, respectively, to meet instream flow requirements, thereby maintaining the historical annual transfers from the Alameda Watershed system to the SFPUC regional water system in accordance with the CCSF's existing water rights; and (2) to minimize impacts on water supply to the SFPUC's wholesale and retail customers during droughts, system maintenance, and in the event of water supply problems or transmission disruptions in the other parts of the SFPUC regional water system.

More specifically, section 14.2 provides a revised construction schedule, and section 14.3 describes the revised project operations, including recapture volumes and operating parameters. Figure 14-2 provides a schematic of the revised ACRP operations set forth in the REIR compared to the operations described in the June 2017 Environmental Impact Report, demonstrating that the revised project operational protocols set forth in the REIR have a reduced operational pumping period and higher Pit F2 water levels below

which pumping is not permitted." *(Robert Shaver, General Manager, Alameda County Water District, December 31, 2019, A-ACWD4-1)*

Response PD-1: Revised Project Description

The commenter describes the revisions to the proposed project consistent with what is presented in the Recirculated Portions of the Draft EIR and indicates that the revised project is more protective of steelhead and downstream water supplies than the project described in the Draft EIR. The planning department acknowledges and agrees with the commenter. Please see also Response PD-2 below, which describes additional revisions to the project description that the SFPUC has added in response to comments received on the Recirculated Portions of the Draft EIR.

17.3.2 Additional Monitoring Requirements (PD-2)

Issues Raised by Commenters

This response addresses all or part of the following comments, which are quoted below:

A-ACWD4-3	A-ACWD5-1	A-ACWD6-1	A-Zone7-2
PH-Hidas-1	PH-Fung-1		

"As long as SFPUC implements the Project as described above and in the REIR and commits to monitoring and reporting on the implementation of the Project as described below, ACWD will not submit any comments in opposition to the REIR. Accordingly, ACWD respectfully requests that the following monitoring and reporting procedures be incorporated into the project description and made a condition of project approval and included in the mitigation monitoring and reporting program (MMRP), so that compliance with the Project operating protocols will be monitored and confirmed:

- Daily pit level monitoring for Pit F2 and any other pits and ponds potentially affected by the Project[ii]
- Daily pumping volumes for water pumped from Pit F2
- Daily accounting of the proposed "accounting system" for water credits and withdrawals, as well as a detailed description of how the accounting is performed
- Hourly pumping rates from Pit F2 to Sunol Valley Water Treatment Plant and San Antonio Reservoir
- Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam
- Installation and operation of a USGS stream gage downstream of the project and upstream of the confluence with Arroyo de la Laguna
- Routine, open sharing of data with stakeholders and interested parties
- Annual presentation and reporting to the Alameda Creek Fisheries Workgroup and other interested stakeholders on project operations and accounting.

ACWD believes that what we are asking for is reasonable- specifically, that SFPUC should 1) commit to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019. and in the REIR; and 2) perform monitoring and provide compliance data to all the stakeholders in the watershed to ensure that the Project is operated as described in the REIR."

[ii] Section 3.4 of Appendix HYD1-R, on page 37, states that "[because] the proposed ACRRP would affect water levels in Pit F2 and could affect water levels in other pits and ponds, the SFPUC has been measuring

water surface elevation in four SMP-24 quarry pits — Pit F2, Pit F3-West, and the Ready Mix Pond — since early 2011." (*Robert Shaver, General Manager, Alameda County Water District, letter, December 31, 2019 [A-ACWD4-3]*)

"Based on our initial analysis of the updates in the REIR, the revised Project description and operating parameters will result in a Project that is more protective of steelhead and downstream water supplies than the previously proposed Project, provided that SFPUC fully complies with the project description and operating protocols set forth in the REIR.

Accordingly, ACWD has requested specific commitments for monitoring and operations reporting to be incorporated into the Project and included in the mitigation monitoring and reporting program (MMRP) in a letter to Chris Kern, dated December 31, 2019.

ACWD considers our requests to be reasonable- SFPUC should 1) commit to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019, and in the REIR; and 2) perform monitoring and provide compliance data to all the stakeholders in the watershed to ensure that the Project is operated as described in the REIR.

ACWD believes that responsible and transparent monitoring and data sharing can help to build greater trust among all the stakeholders in the Alameda Creek watershed who share the common goal of improving environmental conditions for steelhead.

Most importantly, ACWD will not oppose the REIR if the Project can include the requested Project monitoring and reporting. We are making these initial requests prior to the comment deadline to promote coordination and to allow adequate time for any discussions or clarifications concerning our requests during the REIR comment period. Again, ACWD appreciates the continued coordination from staff at the San Francisco Planning Department, and we thank you for your consideration of ACWD's requests." (*Robert Shaver, General Manager, Alameda County Water District, letter, January 2, 2020 [A-ACWD5-1]*)

"ACWD already has provided comments on the REIR in our letter dated December 31, 2019, in which ACWD requested that certain monitoring and reporting procedures be incorporated into the project description and made a condition of project approval. San Francisco Planning Department and SFPUC staffs have been responsive to consider that request, and ACWD and SFPUC have cooperatively discussed how the project description in the REIR can be modified to address ACWD's comments. The attached document, a redline markup of Chapter 14, Revisions to the Project Description, shows the addition of Section 14.3.1.3. ACWD understands that the San Francisco Planning Department and the SFPUC are making these revisions to the EIR.

ACWD finds SFPUC's revisions to Chapter 14, as shown in the attached document, to be acceptable in addressing the comments raised in our previous letter regarding monitoring and coordination.

ACWD applauds SFPUC staff for these revisions, as they reinforce the SFPUC's commitments to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019, and in the REIR. Moreover, these changes will better inform all the stakeholders in the watershed." (*Robert Shaver, General Manager, Alameda County Water District, letter, January 2, 2020 [A-ACWD6-1]*)

In general, any GSP [Groundwater Sustainability Plan] requires groundwater sustainability indicators, including factors such as: groundwater levels, groundwater storage, groundwater quality, land subsidence, and surface water-groundwater interaction. In order to monitor these indicators, a thoughtful system of regular data collection is required. That system of data collection then would feed into a performance standard that would prevent the long-term decline of groundwater levels in the basin. Such long-term decline, of course, is one of the "undesirable results" that SGMA [2014 Sustainable Groundwater Management Act] is intended to prevent and that are inconsistent with a sustainable groundwater basin. We recommend the following data to be collected as part of this project:

1.) Accounting System. Daily recording of the proposed "accounting system" for water credits and withdrawals. This should include a detailed description of how the accounting will be performed and account for loss within the system, such as evaporation and groundwater recharge. This system should include:

   a. Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam;
   b. Daily pit level monitoring for the extraction pit, Pit F2, and any other pits and ponds that may be hydrologically connected to the extraction pit, Pit F2;
   c. Daily pumping volumes for water pumped from the extraction pit, Pit F2;
   d. Daily estimated evaporation from the extraction pit, Pit F2. Zone 7 recommends using the pan evaporation station located at Lake Del Valle, or equivalent, as a proxy for evaporation at the project site;
   e. Daily estimated groundwater recharge from released flows should be included in the accounting system as a loss. Until further information is known about the characteristics of the stream system in this area, Zone 7 recommends using the estimates provided in the McBain & Trush report referenced in HYD1-R — *Dhakal A.S., Buckland E., and McBain S., 2012. Overview of Methods, Models, and Results to Develop Unimpaired, Impaired and Future Flow and Temperature Estimates along Lower Alameda Creek for Hydrologic Year 1996-2009. Draft Technical Memorandum for the Alameda Creek Fisheries Workgroup. April 24, 2012;*
   f. Any water inputs to Pit F2 from local quarry operations; and
   g. Monthly groundwater levels from surrounding monitoring wells

2.) Gauging and Flow Metering. Installation and operation of a stream gauge and flow meter downstream of the project and upstream of the confluence with Arroyo de la Laguna, which meets USGS standards and provides access to the data." (*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-2]*)

"…we appreciate that staff has been responsive to our requests for information as we continue to review the Recirculated EIR. Based on our initial analysis, the revised project description and operating parameters will be more protective of steelhead and downstream water supplies than the previous proposal, as long as SFPUC fully complies with the project description and operating protocols described in the Recirculated EIR.

In the December 31st letter to Planning Staff, ACWD requested that specific commitments for monitoring and reporting be incorporated into the project and a mitigation monitoring and reporting program. ACWD considers its requests to be reasonable, and we ask that the Planning Department, the Planning Commission, and Staff include commitments in the EIR to implement and operate the project as described to the Fisheries Workgroup and in the Recirculated EIR and perform monitoring and provide compliance data to all watershed stakeholders to ensure the project is operated as described.

ACWD believes that transparent monitoring and data sharing can help build greater trust among all stakeholders who share the common goal of improving conditions for steelhead. Most importantly, ACWD will not oppose the Recirculated EIR if the project can include the requested monitoring and reporting." (*Laura Hidas, January 9, 2020 [PH-Hidas-1]*)

"This monitoring program would be a mitigation, then?" (*Commissioner Fung, January 9, 2020 [PH-Fung-1]*)

Response PD-2: Additional Monitoring Requirements

These comments all relate to a request for additional clarification and commitment for the project to include specific monitoring and reporting requirements. The commenters indicate that these requirements should be included in the mitigation monitoring and reporting program (MMRP) for the project.

Under CEQA Guidelines section 15097, the MMRP is a program designed to ensure implementation of the mitigation measures identified in the Final EIR to reduce or avoid the project's significant environmental effects. If the Final EIR is certified and the SFPUC decides to approve the project, the SFPUC will also be required to adopt the MMRP as part of the conditions of project approval. In addition, under CEQA Guidelines section 15126.4, an EIR shall describe mitigation measures that would minimize a significant adverse impact of the project. CEQA Guidelines section 15126.4 further specifies that mitigation measures are not required for effects that are not found to be significant, and that there must be an essential nexus (i.e., connection) between mitigation measures and a legitimate government interest. With respect to the ACRP, neither the Draft EIR nor the Recirculated Portions of the Draft EIR identified a significant adverse impact that would be mitigated through any of the monitoring or reporting requested by the commenters. Therefore, no additional mitigation measures — such as the monitoring and reporting requirements suggested by the commenters — are required to be included in the EIR. Consequently, the MMRP for the proposed project will include only the mitigation measures identified in the Final EIR.

However, in response to these comments, the SFPUC has contacted both ACWD and the Zone 7 Water Agency to discuss the suggested monitoring and reporting. As a result, the SFPUC has agreed to incorporate specific monitoring and reporting requirements into the ACRP project description. The following text is added to page 14-11 of the Recirculated Portions of the Draft EIR (new text is underlined):

14.3.1.3 Operations Monitoring and Reporting

The SFPUC has developed the following monitoring and reporting protocols to track operating parameters of the ACRP. They are:

- Daily pit level monitoring for Pit F2 and any other pits and ponds potentially affected by the ACRP
- Daily pumping volumes for water pumped from Pit F2
- Daily recording of the accounting system for credits and withdrawals, described in Section 14.3.1.2
- Hourly pumping rates from Pit F2 to Sunol Valley Water Treatment Plant and San Antonio Reservoir
- Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam

- Continued operation and maintenance to USGS standards of a stream gage downstream of the ACRP site and upstream of the confluence with Arroyo de la Laguna
- Routine, open sharing of data with stakeholders and interested parties
- Annual presentation and reporting to the Alameda Creek Fisheries Restoration Workgroup and other interested stakeholders on project operations and accounting.

The additions to the project description do not affect the analysis or conclusions of the EIR.

These additions to the project description respond directly to all of the specific items requested by ACWD (comments A-ACWD4-3, A-ACWD5-1, A-ACWD6-1, and PH-Hidas-1), and to most of the items requested by the Zone 7 Water Agency (comment A-Zone7-2). The remaining items requested by the Zone 7 Water Agency include: daily estimated evaporation from Pit F2; daily estimated groundwater recharge from released flows; water inputs to Pit F2 from local quarry operations; and monthly groundwater levels from surrounding monitoring wells. The SFPUC has contacted Zone 7 Water Agency and agreed to discuss SFPUC's ongoing work and monitoring in Sunol Valley with their staff. With respect to water inputs to Pit F2 from local quarry operations, there would be none under the proposed project; see Response PD-3 below for revised text additions that clarify this stipulation.

17.3.3 Additional Changes to Project Description (PD-3)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-ACWD6-2

"Additionally, based on discussions between ACWD and SFPUC staffs over the last several days, ACWD has confirmed that the Project relies on water that passively seeps into Pit F2 and does not include any active pumping of water into Pit F2 from other pits or other potential sources. Therefore, we request that the text be clarified in the Final EIR to reflect exactly how the project will operate. Accordingly, ACWD requests revision of the two sections below (at a minimum) where Pit F2 is referenced. ACWD recognizes that the Planning Department may also revise references related to Pit F2 operations throughout the Chapter. ACWD's suggested revisions are shown in italics:

Page 14-2, second paragraph:

Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. SFPUC would recover water that passively percolates or seeps into Pit F2 *and not from pumping from other pits or other sources.* In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2

would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

Page 14-11, last paragraph:

Any excess water in Pit F2 would be managed by the quarry operators as under existing conditions. If needed to create a dry work area for aggregate extraction, the quarry operators remove water that seeps into the active pits by pumping it into inactive pits, inactive areas of active pits, and other storage ponds. The quarry operator's general practice is to conserve water within the pits for use in aggregate processing and discharge water to the creek only when absolutely necessary. *However, under ACRP operations, Pit F2 will not be used to store and manage water to support quarry operations, as Pit F2 will not receive water pumped from other pits or other sources.*

Based on the revisions in the attached document and the clarification that the Project does not include pumping of water into Pit F2, which should be revised for clarity in the Final EIR, ACWD does not plan to oppose the Project." (*Robert Shaver, General Manager, Alameda County Water District, letter, January 21, 2020 [A-ACWD6-2]*

Response PD-3: Additional Changes to Project Description

In response to this request to revise specific text of the project description, the SFPUC has agreed to make the changes shown below.

The following revision is made to page 14-2 of the Recirculated Portions of the Draft EIR (deleted text is shown as ~~strikethrough~~ and new text is underlined):

> Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. ~~SFPUC~~ The ACRP would recover water that naturally or passively percolates or ~~seeps~~ enters into Pit F2 and not from pumping from other pits. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

The above revision does not affect the analysis or conclusions of the EIR.

The following revision is made to page 14-11 of the Recirculated Portions of the Draft EIR (new text is underlined):

> Any excess water in Pit F2 would be managed by the quarry operators as under existing conditions. If needed to create a dry work area for aggregate extraction, the quarry operators remove water that seeps into the active pits by pumping it into inactive pits,

inactive areas of active pits, and other storage ponds. The quarry operator's general practice is to conserve water within the pits for use in aggregate processing and discharge water to the creek only when absolutely necessary. Under ACRP operations, Pit F2 would not receive water that is pumped from other pits or storage ponds. The quarry operators will continue, as under current practice, to discharge unused Pit F2 water to Alameda Creek when necessary.

The above revision does not affect the analysis or conclusions of the EIR.

17.4 Hydrology (HY)

The comments and corresponding responses in this section address topics related to hydrology, which was first discussed and presented in Volume 1, Chapter 5, Section 5.16, and was then augmented and revised in Volume 4, Chapter 15, Section 15.3.2, and Appendices HYD1-R and HYD2-R. This section responds to comments on the following topics, and the response codes follow the sequential numbering of Responses HY-1 through HY-11, which were included in Volume 3, Section 11.5:

- HY-12: Alameda Creek Streamflow Assumptions
- HY-13: Inflow to Pit F2
- HY-14: Impacts on Sunol Groundwater Basin
- HY-15: Groundwater Data

17.4.1 Alameda Creek Streamflow Assumptions (HY-12)

Issues Raised by Commenters

This response addresses all or part of the following comments, which are quoted below:

A-ACWD3-2 A-ACWD3-3

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2. "The following question makes specific reference to data in Table HYD5-3, which reflects flow in Alameda Creek above the Arroyo De La Laguna confluence for the different scenarios; this stream reach is essentially the "outlet" from Sunol Valley. The table reflects that that there will be, on average, 4,000 AFY more water flowing in Alameda Creek and leaving Sunol Valley under the "With-Project" condition than against the future baseline of "With-CDRP".

   Why is more water reaching the Sunol Valley "outlet" on average under the "With-Project" scenario, as opposed to "With-CDRP" scenario in which SFPUC would not be pumping 6,045 AFY on average annually out of the Sunol Valley? This seems counterintuitive provided that the stated purpose of the proposed project is to recapture the released and bypassed water assumed in the "With-CDRP" scenario." (*Robert Shaver, General Manager, Alameda County Water District, letter, December 18, 2019 [A-ACWD3-2]*)

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3. "Both scenarios (With-CDRP and With-Project) assume a constant 17 cfs loss from Alameda Creek. In the With-Project scenario, this water is assumed to flow to Pit F-2 where it will be pumped out into the regional water system and thus become "recaptured". However, the EIR does not provide information on where this 17 cfs is assumed to go under the With-CDRP scenario.

   Can you please provide clarification on where this water is presumed to go in the With-CDRP scenario?" (*Robert Shaver, General Manager, Alameda County Water District, letter, December 18, 2019 [A-ACWD3-3]*)

Response HY-12: Alameda Creek Streamflow Assumptions

Comment A-ACWD3-2 requests clarification of post-processed model results presented in Appendix HYD1-R, Table HYD5-3, which identifies estimated annual flow volumes in Alameda Creek above its confluence with Arroyo de la Laguna for the 18-year model period. The planning department agrees with the comment that states "on average, 4,000 AF more water flowing in Alameda Creek and leaving Sunol Valley under the 'With-Project' condition that against the future baseline of 'With-CDRP'." Specifically, the EIR analysis determined that at this location, there would be an annual average of 36,540 acre-feet per year streamflow under the with-project conditions and 32,509 acre-feet per year under the with-CDRP condition, a difference of 4,031 acre-feet per year. The explanation for this difference is described on page 94 of Appendix HYD1-R and repeated here.

> "The SFPUC's operation of its Alameda System, and particularly its operation of Calaveras Reservoir, would differ under the four scenarios. The full storage capacity of the reservoir was available under pre-2001 conditions and will be again under with-CDRP and with-project conditions. Storage in the reservoir is limited under existing conditions. The need to make bypasses at the ACDD and releases from Calaveras Reservoir under with-CDRP and with-project conditions create a deficit in Calaveras Reservoir that did not exist under pre-2001 conditions. Recapture of some of the water bypassed and released under with-project conditions reduces the size of the deficit in Calaveras Reservoir and increases the frequency of spills from the reservoir as compared to the with-CDRP scenario. As a result, average annual flows in Alameda Creek downstream of the Calaveras Creek confluence would be greater for with-project conditions than they are for the with-CDRP conditions."

In other words, under both the with-CDRP and with-project conditions, the SFPUC will make releases and bypasses as required by the operating permits, with the reservoir operating at its full historical capacity. Under both scenarios, the SFPUC will be able to withdraw water from Calaveras Reservoir as needed for water supply purposes. However, under the with-project condition, the SFPUC will also be able to withdraw water from Pit F2, thereby reserving more water in storage in Calaveras Reservoir compared to the with-CDRP condition. Thus, on average the reservoir would be at a higher level under the with-project condition, which in turn may increase the frequency of spills compared to the with-CDRP condition. The increased frequency of spill results in higher average annual streamflows at all locations downstream of the reservoir under with-project conditions compared to with-CDRP conditions.

Comment A-ACWD3-3 requests clarification on the assumptions for the 17 cfs streamflow loss under the with-CDRP scenario. This is explained in Appendix HYD1-R, Section 4.3.2, pp. 57-58, *Gains from Quarry NPDES Discharge to Alameda Creek*, and particularly the assumptions used for all scenarios for the 17 cfs loss. As stated in this section, for *both* the with-CDRP and with-project conditions, it was assumed that all of the Alameda Creek surface water that percolates into the subsurface between the Welch Creek and San Antonio Creek confluences finds its way into Pit F2, but the pathway may include other upstream quarry pits, such as Pits F3-East, F3-West, F4 and F6, before eventually reaching Pit F2. In addition, under both scenarios, it was assumed that the quarry operators will continue to discharge excess water to Alameda Creek under their

NPDES permit. Thus, under the with-CDRP scenario, with the expected increase in year-round flows in Alameda Creek downstream of Calaveras Creek, there will be a commensurate increase in subsurface water between Welch Creek and San Antonio Creek confluences, which is expected to increase water levels in all quarry pits adjacent to Alameda Creek. The EIR analysis assumes that similar to existing conditions, the quarry operators will discharge excess water in the quarry pits to Alameda Creek, though the annual average volume of quarry NPDES discharges will be much greater than under existing conditions (6,739 acre-feet per year for the with-CDRP compared to 3,436 acre-feet per year for existing conditions).

To clarify, the loss is not a "constant 17 cfs loss" as stated by the commenter, but instead the model assumes *up to* 17 cfs loss when conditions allow. Also under the with-project scenario, both the model and the post processing assume that *only a portion* of the 17 cfs loss would be recaptured under the ACRP (see Chapter 14, Table 14-1, page 14-6). Under the post-processing analysis conducted for the EIR, it is assumed that the remaining portion of the 17 cfs loss will re-enter Alameda Creek as quarry NPDES discharges. Importantly, the amount of water the SFPUC would recapture from Pit F2 would be limited to the portion of bypassed and released water that the SFPUC would otherwise have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

As shown in Appendix HYD1-R, Table HYD4-9, page 67, the post-processing analysis estimated that average annual quarry NPDES discharges under the with-CDRP condition (6,739 acre-feet per year) would be much greater that under the with-project condition (3,870 acre-feet per year, which is similar to existing conditions).

17.4.2 Inflow to Pit F2 (HY-13)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-ACWD3-4 A-ACWD4-2

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4. "Lastly, as noted in our November 12, 2019 email, Luhdorff & Scalmanini (LSCE) estimated that average groundwater inflow to Pit F-2 is 4.67 cfs (revised DEIR Appendix HYD2 Figure 9-9). However, the proposed rate of pumping from Pit F-2 is on average 6,045 AFY, which is equivalent to a constant flow of about 8 cfs, or nearly twice the average rate of inflow.

   We received your response which in summary states that "in the future with implementation of the upstream releases and bypasses, the expected increase in inflow into Pit F2 over existing conditions would allow the proposed ACRP pumping rate from Pit F2."

   Can you please provide an explanation of the path through which the increased streamflow is assumed to travel into Pit F2 and which would allow for this additional pumping?" (*Robert Shaver, General Manager, Alameda County Water District, letter, December 18, 2019 [A-ACWD3-4]*)

"Based on the revised description of Project operations in section 14.3 of the REIR, supplemented by the additional information in the REIR, ACWD understands that all water entering Pit F2 comes from natural infiltration and not from pumping from other pits.[i] If there are other sources of inflow into Pit F2 aside from natural infiltration, ACWD asks for clarification and quantification of those sources as soon as possible so we may modify our analysis of the REIR accordingly."

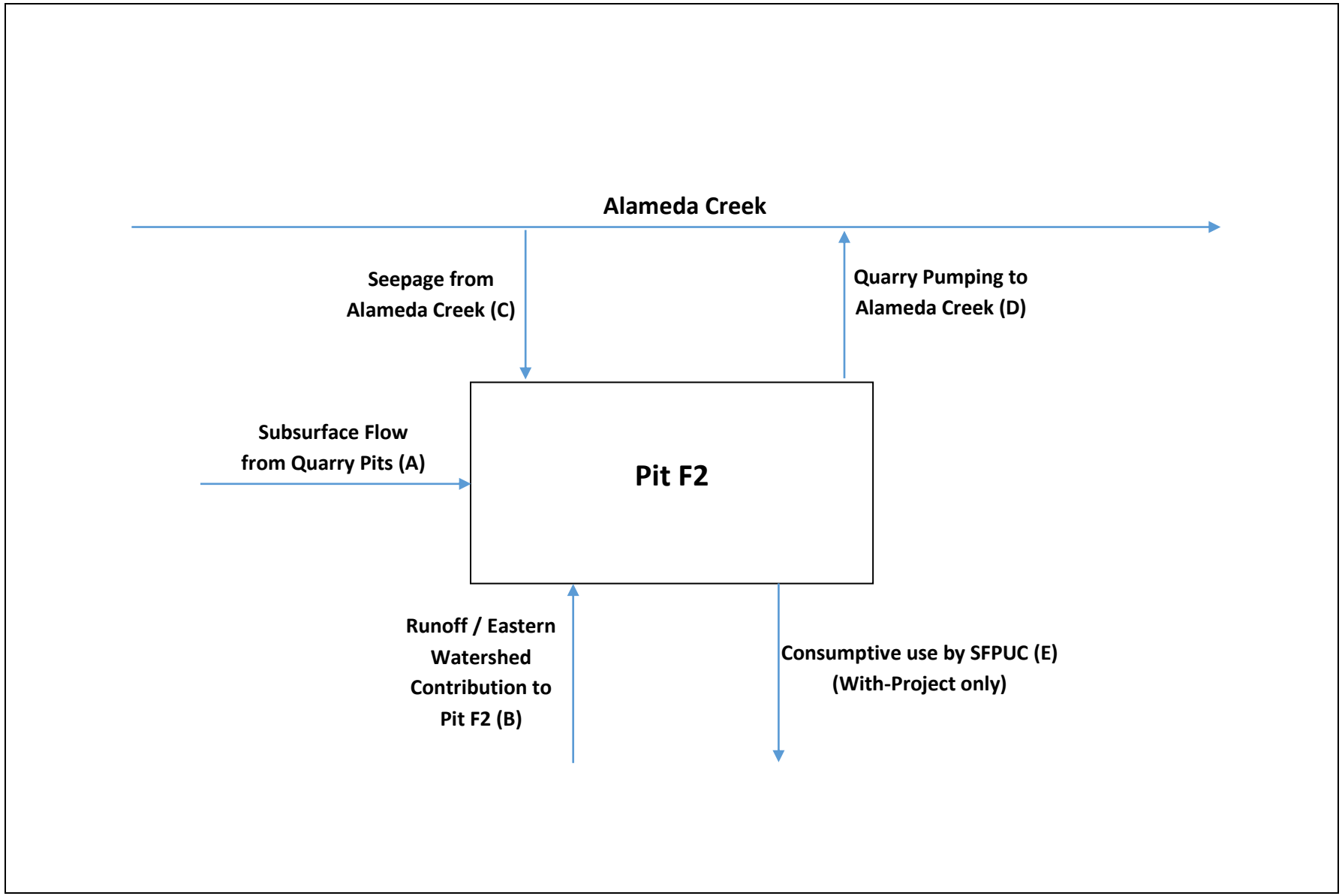
[i] Similarly, when estimating quarry discharges into Alameda Creek, Appendix HYD1-R does not assume pumping from other pits as a source of water entering Pit F2, as shown in Figure HYD4-3 on page 60 of the Revised Surface Water Hydrology Report. Page 64 of the same report states "under the with-project conditions, the SFPUC, not Hanson Aggregates, would be in control of Pit F2 operations." As such ACWD assumes that discharges from other quarry pits would not be pumped into Pit F2, nor will Pit F2 be used to store and manage water to support the operation of other quarry pits. *(Robert Shaver, General Manager, Alameda County Water District, December 31, 2019, [A-ACWD4-2])*

Response HY-13: Inflow to Pit F2

Comment A-ACWD3-4 requests an explanation of the path through which the increased streamflow is assumed to travel into Pit F2. While the implementation of CDRP releases will increase the volume of water in the creek, and therefore the volume of water entering Pit F2, the pathways by which water enters Pit F2 remain unchanged from the existing condition. These pathways are best depicted in Figure HYD4-3 in Appendix HYD1-R and Figure 7-4 in Appendix HYD2-R. Figure HYD4-3 is a simplified schematic showing the various pathways of water entering and leaving Pit F2. Key inputs into the pit are labeled (A) through (C); inputs and outputs deemed constant between scenarios (e.g., precipitation and evaporation) are not shown. As evident in the figure, water enters the pit through three primary pathways: as subsurface flow from upstream quarry pits (A), as runoff from the small watershed to the east of the pit (B), and as direct seepage from Alameda Creek between the cutoff walls surrounding the pit (C). Figure 7-4 from Appendix HYD2-R illustrates the mechanism by which direct seepage into Pit F2 from Alameda Creek occurs.

As described in Appendix HYD2-R, pp. 22 to 23, Figure 7-4 is a three part cross-sectional schematic of Alameda Creek in the vicinity of monitoring well 5, just upstream of Pit F2, under various conditions. Figure 7-4(a) shows the conditions with maximum observed groundwater levels and maximum storage levels in Pit F2; Figure 7-4(b) shows the recession of groundwater with declining streamflow, and Figure 7-4(c) shows the minimum observed groundwater level corresponding to the interpreted base of the shallow aquifer. Under conditions shown in Figure 7-4(a) and (b), subsurface water in the shallow aquifer would flow towards Pit F2. Figures HYD4-3 and 7-4 are reproduced on the following two pages.

Comment A-ACWD3-4 includes some misleading information. The commenter is correct in stating that the EIR analysis estimated that average groundwater inflow to Pit F2 is 4.67 cfs (see Appendix HYD2-R, Section 9.3.2 and Figure 9-9(a)). This average value applies only to the 14-month period from December 2014 to January 2016, which was used to quantify the mass balance calculation for Pit F2. This period was selected for the mass balance analysis because there were no quarry operator additions to the pit, which are otherwise unmonitored; this period also coincided with a significant statewide drought. The commenter, however, makes the misleading

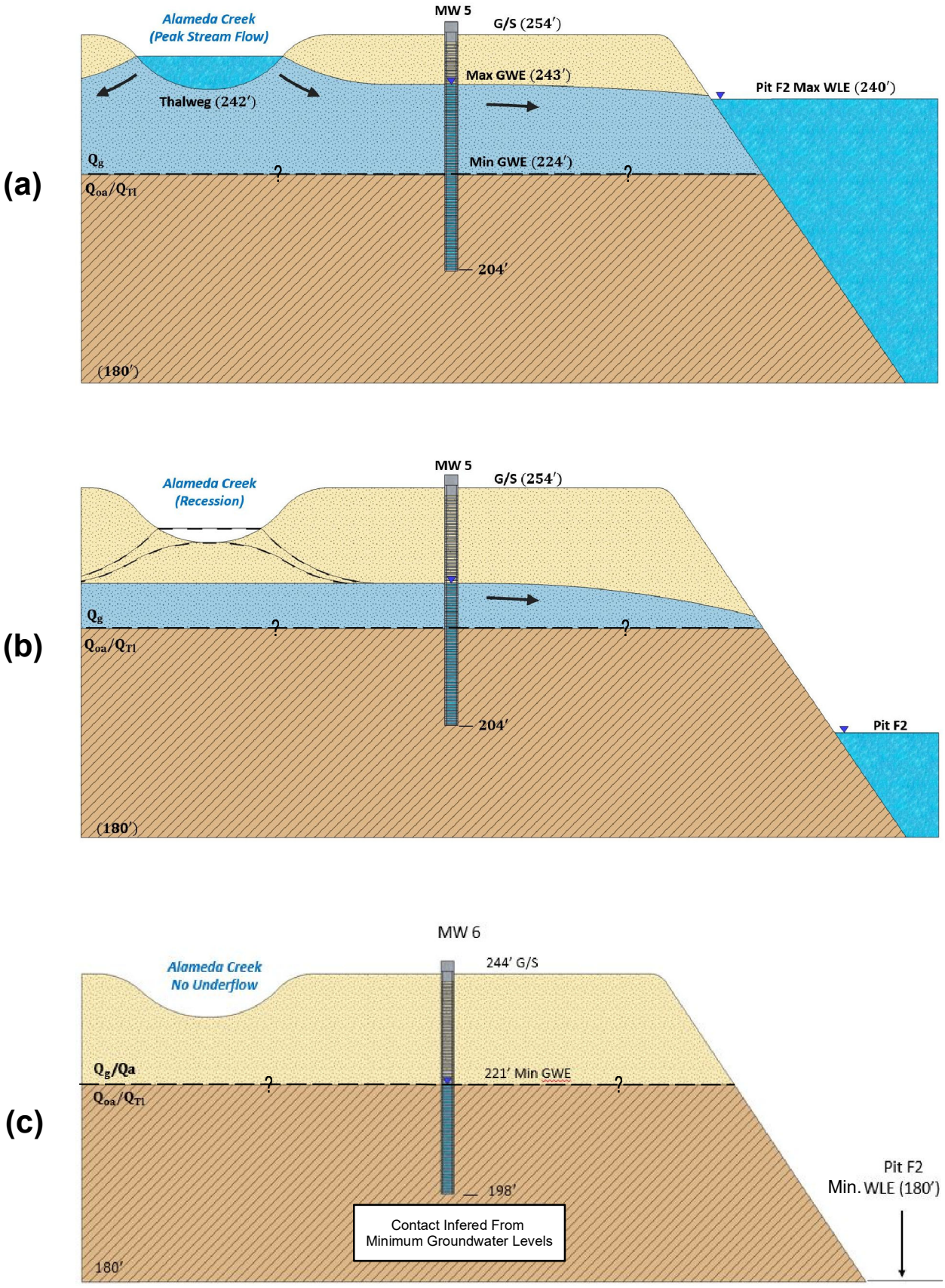


SOURCE: ESA, 2019.

SFPUC Alameda Creek Recapture Project

Figure HYD4-3

Simplified Schematic of Water Entering and Leaving Pit F2



X:\2018\18-068 ESAOrion - (SFPUC) Tech Support for Revisons to ACRP EIR (HYD2)\GIS\RevisedFiguresMT\Figure 7-4.mxd

Luhdorff & Scalmanini
Consulting Engineers

Figure 7-4
Groundwater Conditions at MW 5 and MW 6
Peak Flow (a), Groundwater Recession (b) and Historic Minimum (c)

interpretation of comparing this mass balance calculation for groundwater inflow rate with the average annual groundwater inflow rate for the 18-year study period (September 1995 to October 2013). The 14-month period used in the mass balance analysis represents existing conditions (albeit a dry period), which occurred outside of the ASDHM study period, and does not reflect future conditions under which ACRP operations would occur. Namely, it does not account for any releases from Calaveras Reservoir or bypasses at the Alameda Creek Diversion Dam. As indicated in Table 14-1 (Recirculated Portions of the Draft EIR, page 14-6), under the ACRP, the portion of Pit F2 inflow from bypasses and releases is expected to range from 6,749 to 10,348 acre-feet per year (9.3 to 14.3 cfs). Thus, in the future with implementation of the upstream releases and bypasses, the expected increase in inflow into Pit F2 over existing conditions would allow the proposed ACRP pumping rate from Pit F2.

Comment A-ACWD4-2 also requests clarification on sources of inflow to Pit F2. These sources are shown on Figure HYD4-3 in Appendix HYD1-R, as described above, which states that water enters the pit through three primary pathways: as subsurface flow from upstream quarry pits (A), as runoff from the small watershed to the east of the pit (B), and as direct seepage from Alameda Creek between the cutoff walls surrounding the pit (C). When the CDRP instream bypasses and releases are implemented, there will be year-round flow in Alameda Creek upstream of Pit F2, and inflow from (A) and (C) is expected to increase compared to existing conditions, while (B) will remain the same. The major source of increased inflow to Pit F2 is (A), subsurface flow from upstream quarry pits. This additional inflow would allow for the pumping proposed under the ACRP. The commenter is correct in assuming that under the ACRP, discharges from other quarry pits would not be pumped into Pit F2. Please also refer to Response PD-3, above, which states that the EIR text will be clarified to state that under ACRP operation, Pit F2 would not receive water that is pumped from other pits or storage ponds.

17.4.3 Impacts on Sunol Groundwater Basin (HY-14)

Issues Raised by Commenters

This response addresses all or part of the following comment, which is quoted below:

A-Zone7-1

"We reviewed the referenced document in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley, and as Zone 7's role as the groundwater sustainability agency (GSA) responsible for the sustainable management of the Sunol Groundwater Basin under the 2014 Sustainable Groundwater Management Act (SGMA). Although the Sunol Valley Groundwater Basin (Figure 1, Basin 2-11) is currently listed as very low priority, the actions described in the Draft EIR may lead to an increase in priority for the basin and trigger the earlier development of a Groundwater Sustainability Plan (GSP). Monitoring of groundwater basin conditions and proposed project actions will be integral to documenting overall basin health and sustainability for the GSP. Moreover, it is important that the proposed project not reduce groundwater levels in the Sunol Basin; accordingly, we request that the mitigation monitoring and reporting plan

(MMRP) include a performance standard that precludes any long-term reduction in groundwater levels." (*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-1]*)

Response HY-14: Impacts on Sunol Groundwater Basin

The commenter is concerned with the proposed project's effects on groundwater levels in the Sunol Valley Groundwater Basin and requests that the MMRP include a performance standard that would mitigate any long-term reduction in groundwater levels.

The EIR addresses the impacts on groundwater resources in Impact HY-2, which is included in Volume 1, Chapter 5, Section 5.16, pp. 5.16-69 to 5.16-71, and updated in Volume 4, Chapter 15, Section 15.3.2.2, pp. 15-81 to 15-82. The EIR concludes that operation of the ACRP would not substantially alter the movement of subsurface water, substantially affect groundwater recharge in the Sunol Valley, or affect the production rate of pre-existing nearby wells; the EIR determines that the project's effect on groundwater resources would be less than significant.

The analysis indicates that the project operation relies on movement of water solely through the shallow aquifer system that is isolated from deeper, low-permeability formations that serve as sources of supply elsewhere in the Sunol Valley Groundwater Basin. The narrow and shallow extent of this aquifer system, its limited storage capability, and its drainage pattern to Arroyo de la Laguna make the shallow groundwater system an infeasible source of supply for any beneficial use. Local residential and small-scale supply wells in the Sunol Valley Groundwater Basin are completed in deep, low-yielding formations located in upland areas that are recharged from other sources, and therefore, the project has no potential to affect movement and recharge in any area. Based on the project operations and the characteristics of the Sunol Valley groundwater system (as described in Appendix HYD2-R), there are no project factors that could lead to any long-term reduction in groundwater levels. Furthermore, the source of water for the project recapture operations includes bypasses at the Alameda Creek Diversion Dam and releases from Calaveras Reservoir, and the project does not target native groundwater. As such, the project does not pose a risk to the basin prioritization.

Therefore, under CEQA, because this impact was determined to be less than significant, no mitigation measures or performance measures are warranted to address groundwater resources. However, as described above under Response PD-2, in response to comments received on the Recirculated Portions of the Draft EIR, the SFPUC has agreed to incorporate specific operational monitoring and reporting requirements into the ACRP project description, which includes annual presentation and reporting on project operations and accounting to the commenter as a member of the Alameda Creek Fisheries Restoration Workgroup.

17.4.4 Groundwater Data (HY-15)

Issues Raised by Commenters

This response addresses all or part of the following comments, which are quoted below:

A-Zone7-3 A-Zone7-4 A-Zone7-5

3.) "Nested Monitoring Wells. Installation of at least three, dedicated nested monitoring wells (located both upstream and downstream of the site of extraction, Pit F2) to monitor the extent of influence of extraction in both the shallow and deeper groundwater, and to monitor changes in groundwater elevation and storage near/below the pit bottom. Zone 7 is aware that SFPUC installed up to 13 shallow monitoring wells as a part of the planned Recapture Project in the gravel pit vicinity; however, these wells are relatively shallow and may not reflect extraction impacts to the surrounding groundwater basin." (*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-3]*)

4.) "Modeling and Groundwater Level Data. As a part of the development of the McBain & Trush report referenced in HYD1-R -*"Dhakal A.S., Buckland E., and McBain S., 2012. Overview of Methods, Models, and Results to Develop Unimpaired, Impaired and Future Flow and Temperature Estimates along Lower Alameda Creek for Hydrologic Year 1996-2009. Draft Technical Memorandum for the Alameda Creek Fisheries Workgroup. April 24, 201,"* a HEC-RAS daily predictive hydrologic model, referred to as the Alameda System Daily Hydrologic Model (ASDHM), was developed that estimates streamflow and recharge along Alameda Creek. Several future hydrologic scenarios were developed and simulated using the model. This model, or similar, should be updated to 1.) Reflect proposed conditions, 2.) Verify observed operations and recalibrate as needed, 3.) Demonstrate that no undesirable results have occurred as a result of the project, and 4.) Should it appear that undesirable results may have occurred, then show options for use that restore the groundwater basin to equilibrium.

The model should incorporate the continuously-recording pressure transducer data from the four quarry pits: Pit F2, Pit F3-East, Pit F3-West, and the Ready-Mix Pond, along with existing and new monitoring well levels, to approximate a long-term average groundwater surface elevation. Although, For the Project Draft EIR contains groundwater level trends in these continuously monitored pits, along with Alameda Creek discharge amounts that appear to show correlation between shallow groundwater and creek flows, the relationship between extraction from the pit and the surrounding groundwater basin is not well defined and have not been fully analyzed. For these reasons, Zone 7 requests that the MMRP contain a requirement to maintain a hydrologic model, which results will be included in annual reporting sent to Zone 7. Again, the goal is to demonstrate that there are no long-term undesirable results from the project. (*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-4]*)

"In addition to these efforts to monitor groundwater elevations in the Sunol Basin, it is important to use those data to ensure that groundwater elevations do not decline over time. For this reason, we request that, prior to proceeding with the project, SFPUC conduct groundwater elevation monitoring at all wells and in the pits to determine current groundwater levels to act as a baseline for future evaluation. Our staff will be happy to work with SFPUC staff on the data needed to update the model. Until more is known about the operational flexibility of the Sunol Valley Groundwater Basin, if groundwater levels, as observed in surrounding monitoring wells and the extraction pit, Pit F2 were to fall more than ten (10) feet below the baseline conditions, Zone 7 would require the cessation of groundwater extraction so as to allow the basin to recover. This value of fluctuation is based on the pump tests and hydrographs provided in the 2009 Luhdorff and Scalmanini report, " *Final Report Feasibility To Recapture Reservoir Releases Alameda*

Creek." We request that this performance standard and mitigation measure be included in the MMRP. (*Elke Rank, Zone 7 Water Agency, January 21, 2020 [A-Zone7-5]*)

Response HY-15: Groundwater Data

These comments recommend that additional, specific monitoring, modeling, groundwater data, and performance criteria be included as part of the proposed project. As described above in Response HY-14, the EIR determines that the project's operational impacts on groundwater resources would be less than significant, and thus, under CEQA, no mitigation measures — such as monitoring, updated modeling, or groundwater data collection — and no performance criteria are required. However, as described above under Response PD-2, in response to comments received on the Recirculated Portions of the Draft EIR, the SFPUC has agreed to incorporate specific operational monitoring and reporting requirements into the ACRP project description. The SFPUC has contacted the commenter, the Zone 7 Water Agency, and has agreed to have a detailed discussion with their staff regarding SFPUC's ongoing work and monitoring in the Sunol Valley.

Comment A-Zone7-3 requests the installation of nested monitoring wells "to monitor the extent of influence of extraction in both the shallow and deeper groundwater." This suggestion is not warranted to be included as part of the ACRP based on the analysis presented in Appendix HYD2-R, Section 6.3.1, which indicates that the ACRP would not influence the "deeper groundwater." The deep zone of the aquifer system in the vicinity of Pit F2 consists of Older Alluvium and the Livermore Gravels formation, which are characterized by low hydraulic conductivity (~ 0.4 feet per day). The Livermore Gravels formation is the primary target for aggregate mining. Overlying the older formations is a thin shallow zone of younger alluvium and stream channel gravels (about 15 to 20 feet deep around the project site). These units have comparatively very high hydraulic conductivity (~ 600 feet per day). Only the shallow zone is observed to have a significant and dynamic connection to Alameda Creek and Pit F2 activities. This connection is observed seasonally and on a year-to-year time scale. The shallow zone of younger alluvium and stream channel gravels fills and empties during each hydrologic year irrespective of water year types, as observed through the existing groundwater monitoring well network. As discussed in Appendix HYD2-R, it is evident from historical data that the deep zone does not readily transmit water, which has led to the practice of using slurry walls around quarry pits that are keyed into the Livermore Gravels to reduce seepage into pits. The low conductivity of the formation was also confirmed through pumping test data analysis conducted at the well that was completed in the deep zone. Therefore, the EIR demonstrates that the request to monitor the deeper groundwater is not necessary to mitigate potential impacts of project operations.

Comment A-Zone7-3 also states that the existing shallow monitoring wells are, "relatively shallow and may not reflect extraction impacts to the surrounding groundwater basin." As described above and in Response HY-14, the EIR analysis demonstrates that the ACRP would have a less-than-significant impact on the Sunol Valley Groundwater Basin. Moreover, the project would not extract groundwater from the surrounding groundwater basin. To clarify, the project would pump water from Pit F2 that has seeped into Pit F2 through the shallow aquifer which has

been fed from upstream releases and bypasses. The source of the recaptured water would be from surface water in Alameda Creek that has seeped into Pit F2 via the shallow aquifer. Finally, there are no active supply wells in the project vicinity nor is there potential to develop any significant source of supply along the stream alignment from the shallow aquifer.

Comment A-Zone7-4 states that the hydrologic model should be updated to (1) reflect proposed conditions, (2) verify observed operations and recalibrate as needed, (3) demonstrate project results, and (4) show options that restore undesirable results to the groundwater basin to equilibrium. The comment also requests that the MMRP contain a requirement to maintain a hydrologic model and to provide annual reporting of model results to the Zone 7 Water Agency. As described above and in Response HY-14, the EIR analysis determined that the ACRP would have a less-than-significant impact on groundwater resources, and therefore, under CEQA, no mitigation — such as the requested updates to and maintenance of the hydrologic model — is required as part of the environmental review process, and the MMRP will include only those mitigation measures identified in the Final EIR that are needed to lessen the severity of significant, adverse impacts. Nevertheless, as described above and under Response PD-2, the SFPUC has contacted the Zone 7 Water Agency to discuss mutual concerns regarding ongoing and future use of the hydrologic model. Furthermore, the SFPUC has agreed to conduct an annual presentation and reporting to the Alameda Creek Fisheries Restoration Workgroup, which includes the Zone 7 Water Agency, on project operations and accounting.

The comment also states that "the relationship between extraction from the pit and the surrounding groundwater basin is not well defined and have [*sic*] not been fully analyzed." In fact, a detailed analysis was conducted for the EIR and is included in Appendix HYD2-R. The relationship between extraction from Pit F2 and streamflow and other sources of water accumulation in the pit are quantified in a mass balance analysis in Section 9 of that appendix. Close agreement between mass balance components and pit volume changes provide a sound basis for describing operational impacts to streamflow and groundwater. The conceptualization and modeling of the system indicate that potential impacts of the project are less than significant. In addition, the relationship between pits in the quarry reach and nearby monitoring wells are described in Appendix HYD2-R, Section 7.

Comment A-Zone7-5 further requests establishing a baseline groundwater condition, specifies a performance standard for potential deviations from that baseline, and requests including these measures in the MMRP. As described above and in Response HY-14, the EIR determined that impacts on groundwater resources would be less than significant, and no mitigation is required; thus, in response to the request to include specified measures in the MMRP, no additions to the MMRP are required. As described above, the ACRP would recapture water from upstream releases and bypasses that then seeps into Pit F2; the project would not extract groundwater.

In response to the request to establish a baseline groundwater condition, this is described in Appendix HYD2-R, Sections 7 and 8, and summarized here. Historically, groundwater levels have fluctuated seasonally in a narrow range due to limited thickness of the shallow aquifer, as a function of precipitation and water year type. As stated earlier, water levels change only in the shallow zone of younger alluvium, which fills and empties during each hydrologic year

irrespective of water year types. Minimum groundwater levels correspond to the base of the shallow aquifer system and do not decline further regardless of water year type or mining activities, extending observations that were presented in the LSCE (2009) report referenced by the commenter. It was determined that Alameda Creek recharges the shallow aquifer and fills the storage space during the wet season. The maximum groundwater levels occur during peak storm events. Groundwater in the aquifer then discharges into quarry pits and out of the basin in dry months when the source of recharge ceases. This was observed as a consistent pattern over more than ten years of monitoring, as described in Appendix HYD2-R. The pattern consists of seasonal fluctuations caused by recharge and discharge process and is constrained by the limited shallow aquifer capacity. The maximum fluctuations range from 20 feet at monitoring well (MW4) to 2 feet at MW9 (see Figure 6-4 in Appendix HYD2-R). The monitoring record provides extensive documentation and confirmation of groundwater occurrence in the project area, and the EIR analysis indicates that the ACRP's effects on groundwater storage or water levels would be less than significant. The project recapture volumes would be less than the bypasses and in-stream releases and thus would provide a net gain in recharge throughout the year as compared to historical, or existing conditions.

In response to the request to include a performance standard of a fall of groundwater levels more than 10 feet below baseline conditions, as stated above, the EIR analysis determines that no mitigation measures (and no associated performance standards) are required for groundwater resources because the project's effects on groundwater would be less than significant. The findings from the LSCE 2009 report regarding a 10-foot fluctuation in groundwater are superseded by the analyses in Appendix HYD2-R, which extends the monitoring baseline from the initial observations presented in the 2009 report. The baseline described in Appendix HYD2-R along with the delineation of aquifer subunits indicate that the project does not have the potential to cause groundwater levels to decline, and therefore, a groundwater level performance standard for the ACRP is not applicable.

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CHAPTER 18

Revisions to the Recirculated Portions of the Draft EIR

18.1 Introduction

This chapter presents revisions to the Recirculated Portions of the Draft Environmental Impact Report (EIR) on the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project (ACRP or proposed project). These revisions include both (1) changes made to text, tables, or figures in response to comments on the Recirculated Portions of the Draft EIR as discussed and presented in Chapter 17, as well as (2) staff-initiated text changes to correct minor inconsistencies, to add minor clarifications, and to provide updated information where applicable. None of the revisions or corrections in this chapter substantially change the analysis or conclusions presented in the Recirculated Portions of the Draft EIR.

The chapter includes all revisions by reproducing the relevant excerpt of the Recirculated Portions of the Draft EIR in the sequential order by the chapter, section, and page that it appears in the document. Preceding each revision is a brief explanation for the text change, either identifying the corresponding response codes, such as Response HY-12, where the issue is discussed in Chapter 17 or indicating the reason for a staff-initiated change. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in underline (<u>underline</u>).

18.2 Changes to the Recirculated Portions of the Draft EIR

18.2.1 Chapter 1A: Summary of the Recirculated Portions of the EIR

No revisions were made to this chapter.

18.2.2 Chapter 13: Introduction to the Recirculated Portions of the Draft EIR

No revisions were made to this chapter.

18.2.3 Chapter 14: Revisions to the Project Description

To correct an erroneous citation, footnote 2 on page 14-2 has been deleted:

> Project construction would generally occur Monday through Saturday between 7 a.m. and 7 p.m. Truck hauling and deliveries would occur Monday through Friday between 7 a.m. and 7 p.m.; hauling and deliveries would not occur on Saturdays or Sundays. Construction is expected to begin in 2020 and to be completed in 2022, with an overall duration of 20 months.[2]
>
> ~~[2] SFPUC, *Final Conceptual Engineering Report for Alameda Creek Recapture Project*, November 21, 2014.~~

In response to comments as described in Response PD-2, the following text is added to page 14-11 of the Recirculated Portions of the Draft EIR (new text is underlined):

> ### 14.3.1.3 Operations Monitoring and Reporting
>
> The SFPUC has developed the following monitoring and reporting protocols to track operating parameters of the ACRP. They are:
>
> - Daily pit level monitoring for Pit F2 and any other pits and ponds potentially affected by the ACRP
> - Daily pumping volumes for water pumped from Pit F2
> - Daily recording of the accounting system for credits and withdrawals, described in Section 14.3.1.2
> - Hourly pumping rates from Pit F2 to Sunol Valley Water Treatment Plant and San Antonio Reservoir
> - Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam
> - Continued operation and maintenance to USGS standards of a stream gage downstream of the ACRP site and upstream of the confluence with Arroyo de la Laguna
> - Routine, open sharing of data with stakeholders and interested parties
> - Annual presentation and reporting to the Alameda Creek Fisheries Restoration Workgroup and other interested stakeholders on project operations and accounting

In response to comments as described in Response PD-3, the following revision is made to page 14-2 of the Recirculated Portions of the Draft EIR (deleted text is shown as ~~strikethrough~~ and new text is underlined):

> Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for

> treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. ~~SFPUC~~ The ACRP would recover water that naturally or passively percolates or ~~seeps~~ enters into Pit F2 and not from pumping from other pits. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

In response to comments as described in Response PD-3, the following revision is made to page 14-11 of the Recirculated Portions of the Draft EIR (new text is underlined):

> Any excess water in Pit F2 would be managed by the quarry operators as under existing conditions. If needed to create a dry work area for aggregate extraction, the quarry operators remove water that seeps into the active pits by pumping it into inactive pits, inactive areas of active pits, and other storage ponds. The quarry operator's general practice is to conserve water within the pits for use in aggregate processing and discharge water to the creek only when absolutely necessary. Under ACRP operations, Pit F2 would not receive water that is pumped from other pits or storage ponds. The quarry operators will continue, as under current practice, to discharge unused pit water to Alameda Creek when necessary.

18.2.4 Chapter 15: Recirculated Portions of Environmental Setting, Impacts, and Mitigation Measures

No revisions were made to this chapter.

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APPENDIX COM2

Written Comments on the Recirculated Portions of the Draft EIR, Coded

TABLE COM2-1
PERSONS COMMENTING ON THE RECIRCULATED PORTIONS OF THE ACRP DRAFT EIR

Comment Code	Name of Person and Agency Submitting Comments	Comment Format	Comment Date
Public Agencies			
A-ACWD3	Robert Shaver, General Manager, Alameda County Water District	Letter	12/18/2019
A-ACWD4	Robert Shaver, General Manager, Alameda County Water District	Letter	12/31/2019
A-ACWD5	Robert Shaver, General Manager, Alameda County Water District	Letter	01/02/2020
A-ACWD6	Robert Shaver, General Manager, Alameda County Water District	Letter	01/21/2020
A-Zone7	Elke Rank, Alameda County Flood Control and Water Conservation District, Zone 7	Letter	01/21/2020

A-ACWD3

ALAMEDA COUNTY WATER DISTRICT

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December 18, 2019

Mr. Chris Kern, Principal Planner
Environmental Planning Division
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Kern,

Thank you for your responsiveness to our recent questions and data requests related to the Alameda Creek Recapture Project (ACRP, or proposed project). We at the Alameda County Water District have appreciated your responsiveness in providing clarifications and additional data to assist in our evaluation of the ACRP. We also were pleased to receive prompt notification from the San Francisco Planning Department of the release of the Recirculated EIR (REIR) for the proposed project on December 4, 2019.

ACWD is currently in the process of reviewing the REIR, and we have identified some additional information that would help us to analyze the proposed project. Although we are still evaluating the many pages of text and analysis, the below questions and data requests will help us better understand the proposed project and we are requesting this additional information now so that we may have the benefit of the full review period for our evaluation. We anticipate that ACWD will be providing a detailed set of comments on the REIR at a later date.

1. As indicated in the Board of Supervisors' motion (Appendix BOS) the purpose of the REIR is to further analyze how the proposed project would affect low flow levels in Alameda Creek, with specific regard to impacts on steelhead. In order to determine the sufficiency of the analysis, it is necessary to review the daily flow data from the modeling.

   Accordingly, ACWD is requesting the daily data from the post-processed ASDHM, as described in HYD1-R, Section 4, Analytical Methods of the recirculated portions of the draft. We would like to receive the data as soon as possible, to aid in our timely review of the recirculated EIR.

1

Specifically, we would like data from all five (5) of the scenarios described in the recirculated portions of the draft EIR:

- Pre-2001 conditions
- Existing conditions
- with the Calaveras Dam Replacement Project (with CDRP)
- CDRP with ACRP ("With-Project")
- CDRP BO

Please include in the data, at a minimum, the following data for each of the daily times steps in the modeled period:

- The flow at each modeled node in ASDHM, as post-processed
- The flow to Pit F-2
- Pit F-2 elevation
- Pit F-2 storage
- ACRP pumping rate
- Volume of bypassed and released water available for recapture (as described in Section 14.3.1.1. This volume is limited by unused storage capacity in Calaveras Reservoir)
- Accounting of water credits and withdrawals (as described in Section 14.3.1.2) (if different from above)

1 cont.

2. The following question makes specific reference to data in Table HYD5-3, which reflects flow in Alameda Creek above the Arroyo De La Laguna confluence for the different scenarios; this stream reach is essentially the "outlet" from Sunol Valley. The table reflects that that there will be, on average, 4,000 AFY more water flowing in Alameda Creek and leaving Sunol Valley under the "With-Project" condition than against the future baseline of "With-CDRP".

   Why is more water reaching the Sunol Valley "outlet" on average under the "With-Project" scenario, as opposed to "With-CDRP" scenario in which SFPUC would not be pumping 6,045 AFY on average annually out of the Sunol Valley? This seems counterintuitive provided that the stated purpose of the proposed project is to recapture the released and bypassed water assumed in the "With-CDRP" scenario.

2

3. Both scenarios (With-CDRP and With-Project) assume a constant 17 cfs loss from Alameda Creek. In the With-Project scenario, this water is assumed to flow to Pit F-2 where it will be pumped out into the regional water system and thus become "recaptured". However, the EIR does not provide information on where this 17 cfs is assumed to go under the With-CDRP scenario.

   Can you please provide clarification on where this water is presumed to go in the With-CDRP scenario?

3

4. Lastly, as noted in our November 12, 2019 email, Luhdorff & Scalmanini (LSCE) estimated that average groundwater inflow to Pit F-2 is 4.67 cfs (revised DEIR Appendix HYD2 Figure 9-9). However, the proposed rate of pumping from Pit F-2 is on average 6,045 AFY, which is equivalent to a constant flow of about 8 cfs, or nearly twice the average rate of inflow.

   We received your response which in summary states that "in the future with implementation of the upstream releases and bypasses, the expected increase in inflow into Pit F2 over existing conditions would allow the proposed ACRP pumping rate from Pit F2."

   Can you please provide an explanation of the path through which the increased streamflow is assumed to travel into Pit F2 and which would allow for this additional pumping?

4

Thank you for your consideration of our questions and data requests, which we anticipate will help us make a more informed and balanced analysis of the proposed project. As I noted above, we hope to receive this information as soon as possible to aid in our timely review of the proposed project over the holiday period. If you have any questions or would like to consult on the above questions and issues raised please let us know.

Sincerely,

Robert Shaver
General Manager

A-ACWD4

ALAMEDA COUNTY WATER DISTRICT

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December 31, 2019

Chris Kern
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Dear Mr. Kern:

Subject: ACWD Request for Mitigation Monitoring and Reporting Requirements for the SFPUC Alameda Creek Recapture Project

Thank you for your presentation to the Alameda Creek Fisheries Restoration Workgroup on September 12, 2019. Since your presentation, ACWD has appreciated your continued responsiveness to our questions and data requests related to the San Francisco Public Utilities Commission's (SFPUC's) proposed Alameda Creek Recapture Project (ACRP, or Project). The timely information you have provided has assisted us in our evaluation of the ACRP.

We at the Alameda County Water District are continuing our analysis of the Recirculated EIR (REIR) for the proposed Project. Based on this analysis of the updates in the REIR, the changed Project description and operating parameters describe a Project that is more protective of steelhead and downstream water supplies than the previously proposed Project, provided that SFPUC fully complies with the project description and operating protocols set forth in the REIR.

Section 14.1.1 on page 14-2 of the REIR restates that:

> Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. SFPUC would recover water that passively percolates or seeps into Pit F2. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras

1

> Reservoir but for implementation of the instream flow schedules established for the CDRP.
>
> The key objectives of the ACRP are: (1) to recapture the water that would have otherwise been stored in Calaveras Reservoir due to the release and bypass of flows from Calaveras Dam and the ACDD, respectively, to meet instream flow requirements, thereby maintaining the historical annual transfers from the Alameda Watershed system to the SFPUC regional water system in accordance with the CCSF's existing water rights; and (2) to minimize impacts on water supply to the SFPUC's wholesale and retail customers during droughts, system maintenance, and in the event of water supply problems or transmission disruptions in the other parts of the SFPUC regional water system.

1 cont.

More specifically, section 14.2 provides a revised construction schedule, and section 14.3 describes the revised project operations, including recapture volumes and operating parameters. Figure 14-2 provides a schematic of the revised ACRP operations set forth in the REIR compared to the operations described in the June 2017 Environmental Impact Report, demonstrating that the revised project operational protocols set forth in the REIR have a reduced operational pumping period and higher Pit F2 water levels below which pumping is not permitted. Based on the revised description of Project operations in section 14.3 of the REIR, supplemented by the additional information in the REIR, ACWD understands that all water entering Pit F2 comes from natural infiltration and not from pumping from other pits.[i] If there are other sources of inflow into Pit F2 aside from natural infiltration, ACWD asks for clarification and quantification of those sources as soon as possible so we may modify our analysis of the REIR accordingly.

2

As long as SFPUC implements the Project as described above and in the REIR and commits to monitoring and reporting on the implementation of the Project as described below, ACWD will not submit any comments in opposition to the REIR. Accordingly, ACWD respectfully requests that the following monitoring and reporting procedures be incorporated into the project description and made a condition of project approval and included in the mitigation monitoring and reporting program (MMRP), so that compliance with the Project operating protocols will be monitored and confirmed:

- Daily pit level monitoring for Pit F2 and any other pits and ponds potentially affected by the Project[ii]
- Daily pumping volumes for water pumped from Pit F2
- Daily accounting of the proposed "accounting system" for water credits and withdrawals, as well as a detailed description of how the accounting is performed
- Hourly pumping rates from Pit F2 to Sunol Valley Water Treatment Plant and San Antonio Reservoir
- Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam

3

- Installation and operation of a USGS stream gage downstream of the project and upstream of the confluence with Arroyo de la Laguna
- Routine, open sharing of data with stakeholders and interested parties
- Annual presentation and reporting to the Alameda Creek Fisheries Workgroup and other interested stakeholders on project operations and accounting.

3 cont.

ACWD believes that what we are asking for is reasonable – specifically, that SFPUC should 1) commit to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019, and in the REIR; and 2) perform monitoring and provide compliance data to all the stakeholders in the watershed to ensure that the Project is operated as described in the REIR.

We wanted to make you aware of these initial requests prior to the comment deadline to promote coordination and to allow adequate time for any discussions or clarifications about these requests during the REIR comment period. Thank you very much for your continued coordination, and for consideration of ACWD's requests.

Sincerely,

Robert Shaver
General Manager

la/mh
By E-Mail
cc: Steve Ritchie, San Francisco Public Utilities Commission
Ellen Levin, San Francisco Public Utilities Commission

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[i] Similarly, when estimating quarry discharges into Alameda Creek, Appendix HYD1-R does not assume pumping from other pits as a source of water entering Pit F2, as shown in Figure HYD4-3 on page 60 of the Revised Surface Water Hydrology Report. Page 64 of that same report states, "…under the with-project conditions, the SFPUC, not Hanson Aggregates, would be in control of Pit F2 operations." As such, ACWD assumes that discharges from other quarry pits would not be pumped into Pit F2, nor will Pit F2 be used to store and manage water to support the operation of other quarry pits.

2 footnote

[ii] Section 3.4 of Appendix HYD1-R, on page 37, states that "[because] the proposed ACRP would affect water levels in Pit F2 and could affect water levels in other pits and ponds, the SFPUC has been measuring water surface elevations in four SMP-24 quarry pits – Pit F2, Pit F3-East, Pit F3-West, and the Ready Mix Pond – since early 2011."

3 footnote

A-ACWD5

ALAMEDA COUNTY WATER DISTRICT

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January 2, 2020

Myrna Melgar, President
San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103-2414

Dear President Melgar and Planning Commissioners:

Subject: ACWD Request for Mitigation Monitoring and Reporting Requirements for the SFPUC Alameda Creek Recapture Project, Case No. 2015-004827ENV

The purpose of this letter is to supplement comments that we at the Alameda County Water District (ACWD) are planning to make at the scheduled public hearing on January 9 concerning the Recirculated Portions of the Draft EIR for the San Francisco Public Utilities Commission's (SFPUC's) proposed Alameda Creek Recapture Project (ACRP, or Project).

Firstly, we wish to thank your staff as well as the San Francisco Public Utilities Commission staff for their informative presentation to the Alameda Creek Fisheries Restoration Workgroup on September 12, 2019, and timely and comprehensive responses to our questions and requests. As ACWD and other stakeholders have invested millions of dollars for improvements in the environmental condition for steelhead in the Alameda Creek Watershed in Alameda County, ACWD has an interest in minimizing any potential impacts of the proposed Project to fish.

Based on our initial analysis of the updates in the REIR, the revised Project description and operating parameters will result in a Project that is more protective of steelhead and downstream water supplies than the previously proposed Project, provided that SFPUC fully complies with the project description and operating protocols set forth in the REIR.

Accordingly, ACWD has requested specific commitments for monitoring and operations reporting to be incorporated into the Project and included in the mitigation monitoring and reporting program (MMRP) in a letter to Chris Kern, dated December 31, 2019. 1

ACWD considers our requests to be reasonable – SFPUC should 1) commit to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019, and in the REIR; and 2) perform monitoring and provide compliance data to all the stakeholders in the watershed to ensure that the Project is operated as described in the REIR.

ACWD believes that responsible and transparent monitoring and data sharing can help to build greater trust among all the stakeholders in the Alameda Creek watershed who share the common goal of improving environmental conditions for steelhead.

Most importantly, ACWD will not oppose the REIR if the Project can include the requested Project monitoring and reporting. We are making these initial requests prior to the comment deadline to promote coordination and to allow adequate time for any discussions or clarifications concerning our requests during the REIR comment period. Again, ACWD appreciates the continued coordination from staff at the San Francisco Planning Department, and we thank you for your consideration of ACWD's requests.

1 cont.

Sincerely,

Robert Shaver
General Manager

la/mh
By E-Mail
cc: Chris Kern, San Francisco Planning Department
Steve Ritchie, San Francisco Public Utilities Commission
Ellen Levin, San Francisco Public Utilities Commission

A-ACWD6

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Engineering and Technology Services
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Finance

January 21, 2020

Chris Kern
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Dear Mr. Kern:

Subject: ACWD Comments on the Recirculated EIR for the SFPUC Alameda Creek Recapture Project

Thank you for the opportunity to provide comments on the Recirculated Environmental Impact Report (REIR) for the San Francisco Public Utilities Commission's (SFPUC's) proposed Alameda Creek Recapture Project (ACRP, or Project). The Alameda County Water District (ACWD) acknowledges and appreciates the significant accomplishments of the SFPUC in implementing the Water Supply Improvement Program (WSIP). The high quality water and water supply reliability improvements that the SFPUC is securing with the WSIP improvements are beneficial to all SFPUC customers, including ACWD.

ACWD has a strong interest in protecting and preserving water quality and water supply in Alameda Creek and the Alameda Creek watershed. With a service area located downstream of the proposed project location, ACWD uses water from the Alameda Creek watershed for drinking water supply to over 357,000 residents in the cities of Fremont, Newark, and Union City. ACWD relies on flow in Alameda Creek for groundwater recharge and its subsequent use as a potable drinking water supply. Additionally, ACWD, together with the SFPUC and other watershed stakeholders, is actively involved in the ongoing efforts to restore the federally-threatened Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*) in Alameda Creek. ACWD works cooperatively with SFPUC and Alameda Creek Fisheries Restoration Workgroup on several ongoing projects related to fisheries restoration in Alameda Creek.

ACWD already has provided comments on the REIR in our letter dated December 31, 2019, in which ACWD requested that certain monitoring and reporting procedures be incorporated into the project description and made a condition of project approval. San Francisco Planning Department and SFPUC staffs have been responsive to consider that request, and ACWD and SFPUC have cooperatively discussed how the project description in the REIR can be modified to address ACWD's comments. The attached document, a redline markup of Chapter 14, Revisions to the Project Description, shows the addition of Section 14.3.1.3. ACWD understands that the San Francisco Planning Department and the SFPUC are making these revisions to the EIR. 1

ACWD finds SFPUC's revisions to Chapter 14, as shown in the attached document, to be acceptable in addressing the comments raised in our previous letter regarding monitoring and coordination.

ACWD applauds SFPUC staff for these revisions, as they reinforce the SFPUC's commitments to implement the Project as it was described at the Fisheries Workgroup meeting on September 12, 2019, and in the REIR. Moreover, these changes will better inform all the stakeholders in the watershed.

1 cont.

Additionally, based on discussions between ACWD and SFPUC staffs over the last several days, ACWD has confirmed that the Project relies on water that passively seeps into Pit F2 and does not include any active pumping of water into Pit F2 from other pits or other potential sources. Therefore, we request that the text be clarified in the Final EIR to reflect exactly how the project will operate. Accordingly, ACWD requests revision of the two sections below (at a minimum) where Pit F2 is referenced. ACWD recognizes that the Planning Department may also revise references related to Pit F2 operations throughout the Chapter. ACWD's suggested revisions are shown in italics:

Page 14-2, second paragraph:

> Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. SFPUC would recover water that passively percolates or seeps into Pit F2 *and not from pumping from other pits or other sources*. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

2

Page 14-11, last paragraph:

> Any excess water in Pit F2 would be managed by the quarry operators as under existing conditions. If needed to create a dry work area for aggregate extraction, the quarry operators remove water that seeps into the active pits by pumping it into inactive pits, inactive areas of active pits, and other storage ponds. The quarry operator's general practice is to conserve water within the pits for use in aggregate processing and discharge water to the creek only when absolutely necessary. *However, under ACRP operations, Pit F2 will not be used to store and manage water to support quarry operations, as Pit F2 will not receive water pumped from other pits or other sources.*

Based on the revisions in the attached document and the clarification that the Project does not include pumping of water into Pit F2, which should be revised for clarity in the Final EIR, ACWD does not plan to oppose the Project. 2 cont.

Thank you again for the opportunity to comment during this review period. ACWD is very appreciative of staff from the SFPUC and Planning Department for working to address these comments, and we look forward to continued close collaboration for our shared interests in the Alameda Creek watershed. If you have any questions about these comments, please contact Laura Hidas, Manager of Water Resources, at (510) 668-4441.

Sincerely,

Laura J. Hidas for

Robert Shaver
General Manager

la/jm
Attachment
By E-Mail
cc: Steve Ritchie, San Francisco Public Utilities Commission
Ellen Levin, San Francisco Public Utilities Commission

CHAPTER 14
Revisions to the Project Description

14.1 Introduction

This chapter describes the revisions to the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project (ACRP or project). The SFPUC revised and clarified the operating protocols for the ACRP in response to concerns raised by the National Marine Fisheries Services (NMFS) and California Department of Fish and Wildlife (CDFW). Section 14.3, Revised Project Operations, below, supersedes and replaces EIR Chapter 3, Section 3.6.1, Proposed Operations, and is the basis for the revised impact analysis presented in Chapter 15 of this document. This introductory Section 14.1 summarizes the project description to orient the reader as well as to provide context for the revisions to the project operations described in Section 14.3, below. Section 14.1.1, Project Overview, generally describes the project. The information in Section 14.1.1 is unchanged from the general description of the project found in EIR Chapters 2 and 3.

14.1.1 Project Overview

The SFPUC is proposing the ACRP as one component system-wide improvements to its regional water system known as the Water System Improvement Program (WSIP). The ACRP is a water supply project located in the Sunol Valley in Alameda County on lands owned by the City and County of San Francisco (CCSF) as part of its Alameda Watershed. The ACRP would be implemented following completion of the SFPUC's Calaveras Dam Replacement Project (CDRP), also a WSIP project, which when completed will restore Calaveras Reservoir to its historical capacity. The CDRP is currently under construction and is scheduled for completion in the December 2019. The ACRP would be operated in conjunction with the future operation of the restored Calaveras Reservoir. **Figure 14-1** (an updated version of EIR Figure 2-2) shows the project location, including the downstream location of the ACRP project area relative to the CDRP and provides an overview of the ACRP.

The future operations of Calaveras Dam and Reservoir are subject to federal and state permit requirements. Specifically, when the CDRP is completed, the SFPUC will be required to make releases from Calaveras Dam and to bypass creek flow around the Alameda Creek Diversion Dam (ACDD) in accordance with instream flow schedules set forth by NMFS in its March 5, 2011 biological opinion for this project.[1] The releases and bypasses are designed to improve conditions

[1] National Marine Fisheries Service (NMFS), *Biological Opinion for Calaveras Dam Replacement Project in Alameda and Santa Clara Counties,* Tracking No. 2005/07436, March 5, 2011.

for native aquatic species, including threatened Central California Coast steelhead (*Oncorhynchus mykiss*) in Upper Alameda Creek downstream of Calaveras Dam and the ACDD. The ACRP would "recapture" some of the water that it is required to release and bypass under the permits for the CDRP in order to use this water in its regional water system.

Under the ACRP, the SFPUC would construct pumping and associated facilities to withdraw water from Pit F2, an existing quarry pit formerly used by quarry operators located adjacent to Alameda Creek and about six miles downstream of Calaveras Reservoir. The SFPUC would convey the recovered water to existing SFPUC facilities for treatment and distribution to its customers in the Bay Area. Pit F2 passively collects water originating upstream from Alameda Creek through natural subsurface percolation and seepage, so the SFPUC would not construct any facilities within the Alameda Creek stream channel or actively divert water from the creek. SFPUC would recover water that passively percolates or seeps into Pit F2. In addition, under the ACRP, the amount of water the SFPUC would pump or "recapture" from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP.

The key objectives of the ACRP are: (1) to recapture the water that would have otherwise been stored in Calaveras Reservoir due to the release and bypass of flows from Calaveras Dam and the ACDD, respectively, to meet instream flow requirements, thereby maintaining the historical annual transfers from the Alameda Watershed system to the SFPUC regional water system in accordance with the CCSF's existing water rights; and (2) to minimize impacts on water supply to the SFPUC's wholesale and retail customers during droughts, system maintenance, and in the event of water supply problems or transmission disruptions in the other parts of the SFPUC regional water system.

The detailed project description is presented in EIR Chapter 3, and the only changes to that description are presented below in Sections 14.2, 14.3, and 14.4.

14.2 Revised Construction Schedule

(This section supersedes and replaces EIR Section 3.5.12, Construction Schedule.)

Project construction would generally occur Monday through Saturday between 7 a.m. and 7 p.m. Truck hauling and deliveries would occur Monday through Friday between 7 a.m. and 7 p.m.; hauling and deliveries would not occur on Saturdays or Sundays. Construction is expected to begin in 2020 and to be completed in 2022, with an overall duration of 20 months.[2]

2 SFPUC, *Final Conceptual Engineering Report for Alameda Creek Recapture Project,* November 21, 2014.

Figure 14-1 Project Location and Overview of Alameda Creek Recapture Project
(11x17)

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14.3 Revised Project Operations

14.3.1 Proposed Operations

(This section supersedes and replaces EIR Sections 3.6.1.1 to 3.6.1.2. Section 14.3.1.1 Recapture Volumes replaces EIR Section 3.6.1.1; and Section 14.3.1.2 replaces EIR Section 3.6.1.2, Operating Parameters (EIR Chapter 3, pp. 3-25 to 3-29) in their entirety. EIR Sections 3.6.1.3, Pumping Scenarios, and 3.6.1.4, Power Demand, remain unchanged.)

14.3.1.1 Recapture Volumes

Recapture operations under the ACRP would occur after implementation of the instream flow schedules required as part of the regulatory permits for future operations of Calaveras Reservoir and the ACDD. ACRP operations would not commence until the CDRP is completed and SFPUC implements the instream flow schedules of bypasses at ACDD and releases from Calaveras Reservoir (referred to as "bypasses and releases"). The proposed project would recapture the portion of bypasses and releases as needed and as available at the existing quarry Pit F2 in the Sunol Valley, downstream of the compliance points for the bypasses and releases below the ACDD and Calaveras Dam, respectively. The project would take advantage of the natural infiltration of water into the ground in the vicinity of Pit F2 and its detention in the pit as the means by which the water would be recaptured. Using the proposed ACRP facilities described in EIR Chapter 3, Section 3.4, the SFPUC would then pump water from Pit F2, and the recaptured water would be transferred to the regional water system for municipal use. The recapture operation of the ACRP would be conducted within the CCSF's existing pre-1914 appropriative water rights. The volume of recaptured water would be tracked daily to ensure the operation is conducted within these water rights.

The SFPUC used the Alameda System Daily Hydrologic Model (ASDHM) framework[3] to estimate the volume of water that the SFPUC would recapture to offset the loss of water supply yield from the Alameda Watershed due to the bypasses and releases, without expanding the CCSF's existing water rights. The SFPUC estimated the ACRP recapture volume using historical hydrology for the period October 1995 to September 2013 and accounting for future ACDD and Calaveras Reservoir operations, including the bypasses and releases. The volume of water bypassed and released, and subsequently available for recapture, would vary from year to year based on precipitation (i.e., water year types) and the specific requirements of the instream flow schedules. For the hydrologic period of October 1995 to September 2013, the SFPUC estimates that under the ACRP, there would be an average annual recapture volume of 6,045 acre-feet per year, with a range of 4,045 to 8,031 acre-feet per year.[4] This estimated average recapture volume is less than the estimated average loss of yield associated with the bypasses and releases, and for

[3] See Appendix HYD1-R for a description of the Alameda System Daily Hydrologic Model.

[4] The recapture volumes presented in this EIR are calculated values derived from the ASDHM, which used 18 years of hydrological data to estimate recapture volumes under those historical conditions. Although the recapture volumes appear precise, the reader should keep in mind that these are estimates based on modeled values.

the purposes of this EIR, assumes future water years, on average, will be similar to the modeled hydrologic period.

Table 14-1 summarizes the proposed recapture volumes based on the 18-year historical hydrology period. To determine the recapture volume, the SFPUC conducted a series of calculations taking into account the daily volume of bypasses and releases, available storage in Calaveras Reservoir, and operating parameters at the recapture location, Pit F2. The average annual volume of water to be bypassed and released (i.e., the annual sum of daily bypasses and releases) under the CDRP permit requirements is shown in Table 14-1, Row 1; this is the amount potentially available for recapture. Table 14-1, Row 2 presents the estimated portion of Pit F2 inflow from the bypasses and releases, and Row 3 presents the estimated volume of water proposed for recapture on an average annual basis.

TABLE 14-1
SIMULATED CDRP BYPASSES AND RELEASES AND ACRP RECAPTURE VOLUMES UNDER REVISED OPERATIONS (acre-feet per year)

Operational Parameter	18-year Hydrologic Period		Wet Year		Dry Year	
	Average	Range	Average	Range	Average	Range
1. CDRP Bypasses and Releases (annual sum of daily flows)	14,695	8,238 – 26,185	18,345	11,142 – 26,185	10,133	8,238 – 14,570
2. Portion of Pit F2 Inflow from Bypasses and Releases	8,691	6,749 – 10,348	9,615	8,546 – 10,348	7,536	6,749 – 8,568
3. ACRP Recapture Volume, revised operations	6,045	4,045 – 8,031	5,396	4,045 – 8,031	6,856	6,187 – 7,258

NOTE: CDRP bypasses and releases, infiltration into Pit F2, and ACRP recapture based on 18-years of historical hydrology and simulated future operation of CDRP from October 1995 to September 2013.

SOURCE: SFPUC 2019

While the volume of water available for recapture is generally based on the volume of bypassed and released water, the project's calculated recapture volume is limited by available storage in Calaveras Reservoir and Pit F2 operating parameters (see Section 14.3.1.2, below). The amount of water the SFPUC would recapture from Pit F2 would be limited to the portion of the bypassed and released water that the SFPUC otherwise would have stored in Calaveras Reservoir but for implementation of the instream flow schedules established for the CDRP. For example, on a day when Calaveras Reservoir fills to capacity, the volume of bypassed and released water available for recapture is zero; the calculated water available for recapture starts accumulating again when Calaveras Reservoir storage recedes and there is unused storage capacity in the reservoir. Thus, the amount of water available for recapture on any given day is the lesser of the volume of water bypassed and released, or available (unused) storage volume in Calaveras Reservoir. Stated otherwise, at any time, the sum of water stored in Calaveras Reservoir and the volume of water available for recapture in Pit F2 would not exceed the total available capacity of the reservoir. The estimated volume of water proposed for recapture on an average annual basis is presented in Table 14-1, Row 3. This portion of the bypassed and released water would be recaptured from Pit

F2, and it is less than or equivalent to the volume of water that is the loss of yield to the SFPUC regional water system.

Water downstream of the bypass and release compliance points fills Pit F2 by natural infiltration. Other sources of water in the watershed also contribute to water entering Pit F2. Table 14-1, Row 2 presents the estimated portion of Pit F2 inflow from the bypasses and releases only. In addition to bypasses and releases, inflow to Pit F2 from other sources in the watershed includes contributions from the downstream watersheds below Calaveras and San Antonio Reservoirs as well as direct contributions from watersheds east of the quarry reach. Therefore, the total annual inflow to Pit F2 from all sources (i.e., infiltration of bypasses and releases plus other watershed sources) would be greater than the volume of water shown in Table 14-1, Row 2.

As shown on Table 14-1, the *average* annual volume of water proposed for recapture during the modeled period (Row 3, 18-year Hydrologic Period) is less than the *average* inflow from bypasses and releases during the same period (Row 2, 18-year Hydrologic Period). Likewise, during both wet and dry years, the *average* annual volume of water proposed for recapture (Row 3, Wet Year) is less than the *average* inflow from bypasses and releases (Row 2, Wet Year).[5].

On average, the total annual volume of the portion of bypassed and released water that infiltrates into Pit F2 would exceed the volume of water recaptured. This excess volume represents the portion of bypassed and released water that infiltrates into Pit F2 but is not proposed for recapture.

14.3.1.2 Operating Parameters

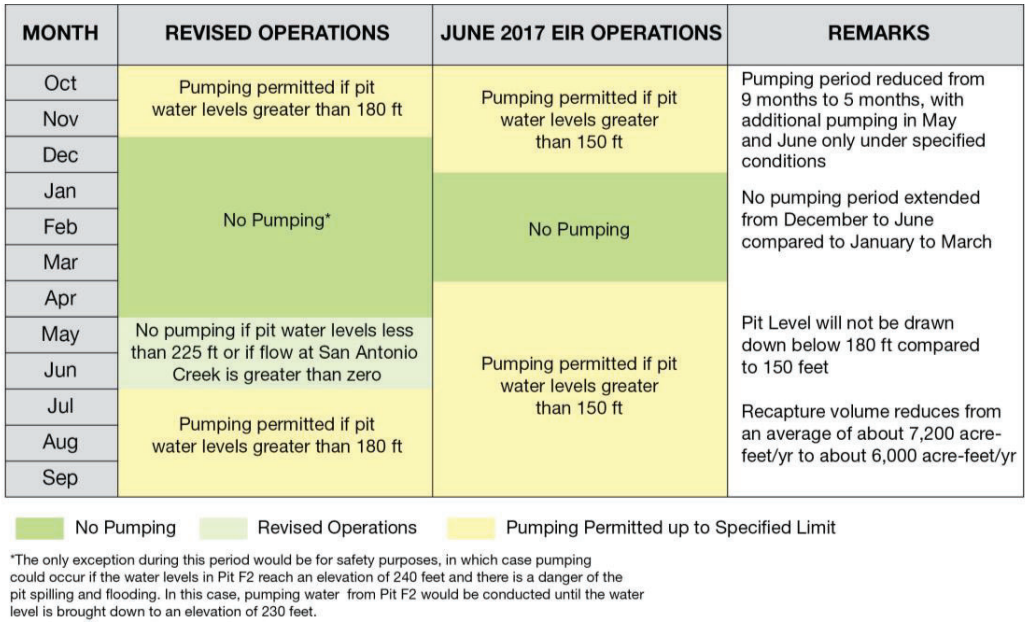
The SFPUC has developed strict operating protocols for the ACRP in order to avoid effects on Alameda Creek streamflow during the steelhead migration season. The SFPUC would maintain the elevation in Pit F2 between 180 feet and 240 feet.[6] Nearly all pumping for the recapture operations would occur between July 1 and November 30 of each year, outside of the migration period for steelhead in Alameda Creek. From December 1 to April 30 of each year, no pumping from Pit F2 for recapture operations would occur, with one exception. The exception during this period would be for safety purposes, which could occur if the water levels in Pit F2 reach an elevation of 240 feet and there is a danger of the pit spilling and flooding; in this event, the SFPUC would pump the water from Pit F2 until the water level is brought down to an elevation of 230 feet.

No pumping from Pit F2 would occur from May 1 to June 30 under either of the following two conditions: (1) streamflow in Alameda Creek just above its confluence with San Antonio Creek is

[5] Under the revised operations with the reduced period of pumping and the higher operating water levels in Pit F2, the volume of recaptured water would be less than assumed in the June 2017 EIR. The likelihood of recapturing water stored from previous years (i.e., carryover operations) is greatly reduced and would be expected to occur rarely. Based on 18 years of modeling, the volume of pumping from Pit F2 is only greater than Pit F2 inflow from bypasses and releases in hydrologic year 2012 (by 330 acre feet) (although total Pit F2 inflow in hydrologic year 2012 is greater than the recaptured volume). In all other hydrologic years of the study period, the amount of water the SFPUC would recapture from Pit F2 would be less than the portion of Pit F2 inflow from bypassed and released water in that hydrologic year.

[6] All water levels in Pit F2 are described in terms of elevation relative to NAVD88.

greater than zero,[7] or (2) the water elevation in Pit F2 is less than 225 feet elevation, even if the flow at Alameda Creek above San Antonio Creek is zero.[8] In other words, pumping could occur in May and June only when there is no streamflow in Alameda Creek above the confluence with San Antonio Creek and the water elevation in the pit is greater than 225 feet. At no time of the year would the SFPUC draw down the water levels in Pit F2 below an elevation of 180 feet. **Figure 14-2** schematically depicts the revised ACRP operational protocols for each month of the year compared to the monthly operations previously proposed in the June 2017 EIR. **Figure 14-3** is a cross-section of Pit F2 and shows the revised operating range of water levels.



SOURCE: SFPUC, 2019.

Figure 14-2
Schematic of Revised ACRP Operations Compared to June 2017 EIR

In addition to the above constraints, the SFPUC would pump only when the SFPUC's accounting of water credits and withdrawals shows that the CCSF has the right to divert the water. As part of the future joint operation of Calaveras Reservoir and the ACRP, the SFPUC would maintain an accounting system to track the water credits under CCSF's water rights in the Alameda Watershed. The pumping from Pit F2 would be limited by those credits associated with the space available in Calaveras Reservoir at all times. Regardless of water rights, pumping from Pit F2 would only occur within the timeframes and conditions described above.

7 When there is no streamflow in Alameda Creek above its confluence with San Antonia Creek (i.e., streamflow is zero), there is no connectivity in Alameda Creek between the Sunol Valley and upper or lower Alameda Creek, and under these conditions, the creek is not an active migration corridor for steelhead.

8 A Pit F2 water surface elevation of 225 feet is used as the threshold for pumping in May and June because this elevation represents the approximate contact point between the permeable stream channel gravels and the older, impermeable alluvium and Livermore Gravels. When water levels in the pit are above 225 feet, there is limited potential for the pit to accept seepage from the adjacent aquifer. Therefore, there is limited potential for the pit to drawdown water levels from the adjacent aquifer, which could indirectly affect streamflow within the creek. See Appendix HYD2-R for a discussion of the hydrogeologic properties of these two geologic units.

SFPUC would use four pumps on floating barges to pump water from Pit F2 directly to the Sunol Valley Water Treatment Plant (SVWTP) or San Antonio Reservoir. It is anticipated that, in most cases, the water withdrawn from Pit F2 would be conveyed to the SVWTP and thereby reduce the volume of water conveyed from Calaveras Reservoir to SVWTP, enabling the SFPUC to conserve water in Calaveras Reservoir and maintain the historical annual transfers from the Alameda Watershed system to the regional water system. The SFPUC would pump water from Pit F2 at a flow rate of approximately 30 cubic feet per second (cfs), which is based on the minimum flow rate

Figure 14-3 Schematic of Revised ACRP Operating Protocols

needed to operate the SVWTP.[9] If the recaptured water is conveyed to San Antonio Reservoir, the water would be used to fill the available storage at that reservoir and subsequently would be treated at the SVWTP for delivery to the SFPUC service area.[10] It is anticipated that on average, the ACRP would operate for approximately 101 days a year. The various pumping scenarios are described in EIR Chapter 3, Section 3.6.1.3 and remain unchanged.

In general, the SFPUC intends to operate Pit F2 within an upper and lower limit of water elevations in Pit F2, based on the relationship of water elevation to water volume. The operating elevations would range from 240 to 180 feet. At its lowest point, the bottom of Pit F2 is roughly 10 feet above msl. SFPUC would manage water elevations in Pit F2 by using a water level sensor in Pit F2 to monitor water elevations.[11] **Figure 14-4** depicts the proposed normal operating scenario, showing the anticipated variation in water elevations in Pit F2 over the course of a water year in comparison to the previously proposed operating scenario in the June 2017 EIR. **Figure 14-5** (same as Figure 3-5 in the June 2017 EIR) shows the Pit F2 water depth-to-volume relationship developed from 2006 LIDAR data, which can be used to estimate the volume of water stored in the quarry pit based on the water level in the pit.

To avoid the potential for instability of the quarry pit slopes, water levels in Pit F2 would be controlled in accordance with the recommendations presented in the geotechnical evaluation report prepared for the proposed project.[12] The proposed maximum rate of drawdown of 30 cfs would be acceptable from a slope stability standpoint under the proposed normal operating drawdown condition (drawdown from 240 to 180 feet).

Any excess water in Pit F2 would be managed by the quarry operators as under existing conditions. If needed to create a dry work area for aggregate extraction, the quarry operators remove water that seeps into the active pits by pumping it into inactive pits, inactive areas of active pits, and other storage ponds. The quarry operator's general practice is to conserve water within the pits for use in aggregate processing and discharge water to the creek only when absolutely necessary.

9 If the flow rate from Pit F2 is less than 30 cfs (e.g., if one or more of the ACRP pumps are out of service), SFPUC would augment the inflow into SVWTP with another water supply source (i.e., water stored in San Antonio Reservoir or Calaveras Reservoir) to provide the minimum flow rate.

10 SFPUC, *Final Conceptual Engineering Report for Alameda Creek Recapture Project*, November 21, 2014.

11 Ibid.

12 T&R/RYGG, 2014. *Final Geotechnical Evaluation, Alameda Creek Recapture Project, Sunol California. SFPUC Project No. CUW 352.01.* December 23, 2014.

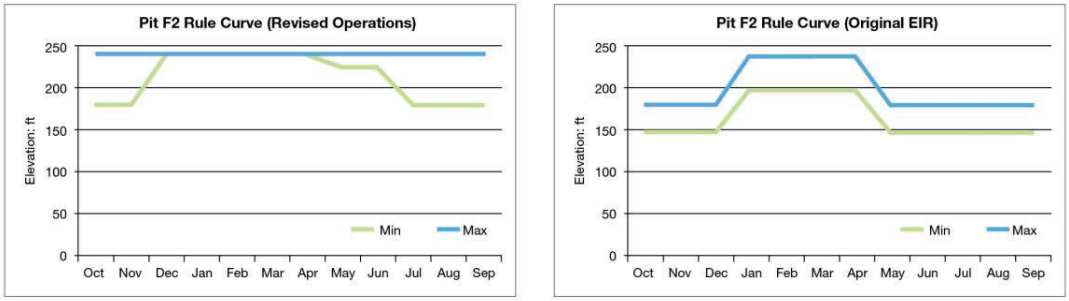


Figure 14-4
Revised Operation Scenario Compared to Original EIR

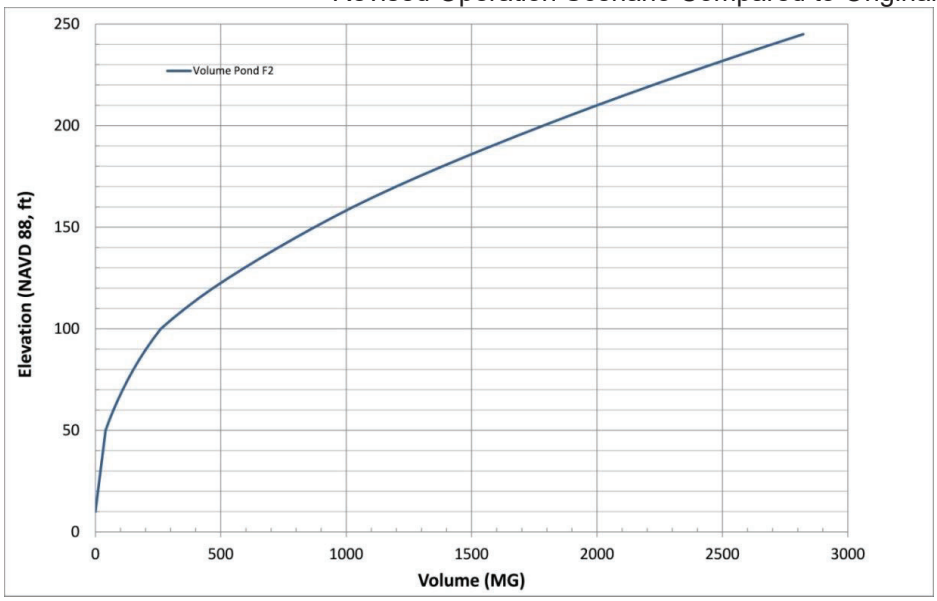


Figure 14-5
Pit F2 Water Elevation to Volume Relationship
(same as Figure 3-5)

14.3.1.3 Operations Monitoring and Reporting

The SFPUC has developed the following monitoring and reporting protocols to track operating parameters of the ACRP. They are:

- Daily pit level monitoring for Pit F2 and any other pits and ponds potentially affected by the ACRP
- Daily pumping volumes for water pumped from Pit F2
- Daily recording of the accounting system for credits and withdrawals, described in Section 14.3.1.2

- Hourly pumping rates from Pit F2 to Sunol Valley Water Treatment Plant and San Antonio Reservoir

- Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam

- Continued operation and maintenance to USGS standards of a stream gage downstream of the ACRP site and upstream of the confluence with Arroyo de la Laguna

- Routine, open sharing of data with stakeholders and interested parties

- Annual presentation and reporting to the Alameda Creek Fisheries Restoration Workgroup and other interested stakeholders on project operations and accounting.

14.4 Additional Required Permits

(This section augments EIR Chapter 3, Section 3.7.)

14.4.1 State

- California Department of Fish and Wildlife – Lake and Streambed Alteration Agreement pursuant to Fish & Game Code section 1600 et seq.

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ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

January 21, 2020

Chris Kern
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
Sent by e-mail to: chris.kern@sfgov.org

Re: SFPUC Alameda Recapture Project – Recirculated Portions of Draft EIR

Chris:

We reviewed the referenced document in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley, and as Zone 7's role as the groundwater sustainability agency (GSA) responsible for the sustainable management of the Sunol Groundwater Basin under the 2014 Sustainable Groundwater Management Act (SGMA). Although the Sunol Valley Groundwater Basin (Figure 1, Basin 2-11) is currently listed as very low priority, the actions described in the Draft EIR may lead to an increase in priority for the basin and trigger the earlier development of a Groundwater Sustainability Plan (GSP). Monitoring of groundwater basin conditions and proposed project actions will be integral to documenting overall basin health and sustainability for the GSP. Moreover, it is important that the proposed project not reduce groundwater levels in the Sunol Basin; accordingly, we request that the mitigation monitoring and reporting plan (MMRP) include a performance standard that precludes any long-term reduction in groundwater levels. 1

In general, any GSP requires groundwater sustainability indicators, including factors such as: groundwater levels, groundwater storage, groundwater quality, land subsidence, and surface water-groundwater interaction. In order to monitor these indicators, a thoughtful system of regular data collection is required. That system of data collection then would feed into a performance standard that would prevent the 2

long-term decline of groundwater levels in the basin. Such long-term decline, of course, is one of the "undesirable results" that SGMA is intended to prevent and that are inconsistent with a sustainable groundwater basin. We recommend the following data to be collected as part of this project:

1.) Accounting System. Daily recording of the proposed "accounting system" for water credits and withdrawals. This should include a detailed description of how the accounting will be performed and account for loss within the system, such as evaporation and groundwater recharge. This system should include:

   a. Daily volumes of releases at Calaveras Dam and bypasses at Alameda Creek Diversion Dam;
   b. Daily pit level monitoring for the extraction pit, Pit F2, and any other pits and ponds that may be hydrologically connected to the extraction pit, Pit F2;
   c. Daily pumping volumes for water pumped from the extraction pit, Pit F2;
   d. Daily estimated evaporation from the extraction pit, Pit F2. Zone 7 recommends using the pan evaporation station located at Lake Del Valle, or equivalent, as a proxy for evaporation at the project site;
   e. Daily estimated groundwater recharge from released flows should be included in the accounting system as a loss. Until further information is known about the characteristics of the stream system in this area, Zone 7 recommends using the estimates provided in the McBain & Trush report referenced in HYD1-R – "*Dhakal A.S., Buckland E., and McBain S., 2012. Overview of Methods, Models, and Results to Develop Unimpaired, Impaired and Future Flow and Temperature Estimates along Lower Alameda Creek for Hydrologic Year 1996-2009. Draft Technical Memorandum for the Alameda Creek Fisheries Workgroup. April 24, 2012;*"
   f. Any water inputs to Pit F2 from local quarry operations; and
   g. Monthly groundwater levels from surrounding monitoring wells.

2.) Gauging and Flow Metering. Installation and operation of a stream gauge and flow meter downstream of the project and upstream of the confluence with Arroyo de la Laguna, which meets USGS standards and provides access to the data.

3.) Nested Monitoring Wells. Installation of at least three, dedicated nested monitoring wells (located both upstream and downstream of the site of extraction, Pit F2) to monitor the extent of influence of extraction in both the shallow and deeper groundwater, and to monitor changes in groundwater elevation and storage near/below the pit bottom. Zone 7 is aware that SFPUC installed up to 13 shallow

2 cont.

3

monitoring wells as a part of the planned Recapture Project in the gravel pit vicinity; however, these wells are relatively shallow and may not reflect extraction impacts to the surrounding groundwater basin. 3 cont.

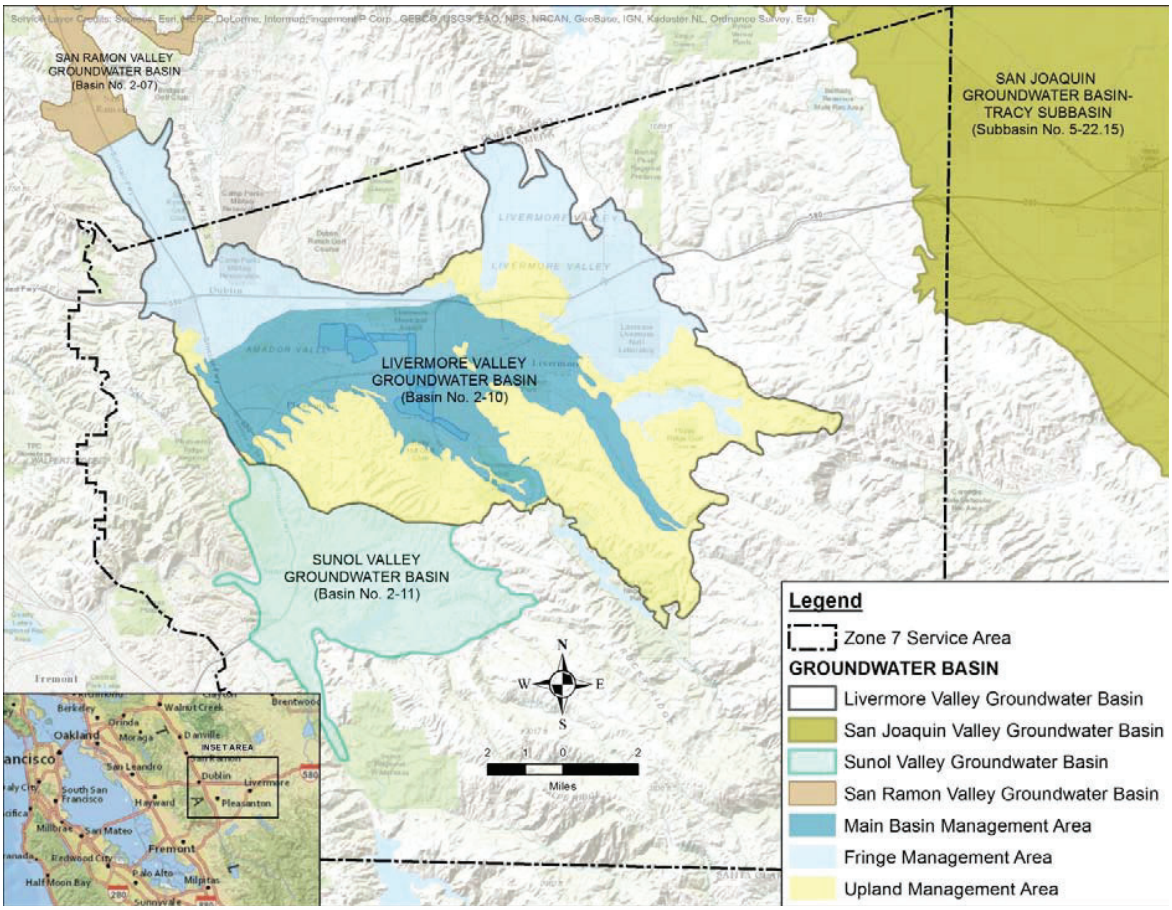
4.) Modeling and Groundwater Level Data. As a part of the development of the McBain & Trush report referenced in HYD1-R – "*Dhakal A.S., Buckland E., and McBain S., 2012. Overview of Methods, Models, and Results to Develop Unimpaired, Impaired and Future Flow and Temperature Estimates along Lower Alameda Creek for Hydrologic Year 1996-2009. Draft Technical Memorandum for the Alameda Creek Fisheries Workgroup. April 24, 201,*" a HEC-RAS daily predictive hydrologic model, referred to as the Alameda System Daily Hydrologic Model (ASDHM), was developed that estimates streamflow and recharge along Alameda Creek. Several future hydrologic scenarios were developed and simulated using the model. This model, or similar, should be updated to 1.) Reflect proposed conditions, 2.) Verify observed operations and recalibrate as needed, 3.) Demonstrate that no undesirable results have occurred as a result of the project, and 4.) Should it appear that undesirable results may have occurred, then show options for use that restore the groundwater basin to equilibrium. 4

The model should incorporate the continuously-recording pressure transducer data from the four quarry pits: Pit F2, Pit F3-East, Pit F3-West, and the Ready-Mix Pond, along with existing and new monitoring well levels, to approximate a long-term average groundwater surface elevation. Although, For the Project Draft EIR contains groundwater level trends in these continuously monitored pits, along with Alameda Creek discharge amounts that appear to show correlation between shallow groundwater and creek flows, the relationship between extraction from the pit and the surrounding groundwater basin is not well defined and have not been fully analyzed. For these reasons, Zone 7 requests that the MMRP contain a requirement to maintain a hydrologic model, which results will be included in annual reporting sent to Zone 7. Again, the goal is to demonstrate that there are no long-term undesirable results from the project.

In addition to these efforts to monitor groundwater elevations in the Sunol Basin, it is important to use those data to ensure that groundwater elevations do not decline over time. For this reason, we request that, prior to proceeding with the project, SFPUC conduct groundwater elevation monitoring at all wells and in the pits to determine current groundwater levels to act as a baseline for future evaluation. Our staff will be happy to work with SFPUC staff on the data needed to update the model. Until more is known about the operational flexibility of the Sunol Valley Groundwater Basin, if groundwater levels, as observed in surrounding monitoring wells and the extraction pit, 5

Pit F2,, were to fall more than ten (10) feet below the baseline conditions, Zone 7 would require the cessation of groundwater extraction so as to allow the basin to recover. This value of fluctuation is based on the pump tests and hydrographs provided in the 2009 Luhdorff and Scalmanini report, "*Final Report Feasibility To Recapture Reservoir Releases Alameda Creek.*" We request that this performance standard and mitigation measure be included in the MMRP. 5 cont.

Figure 1: Livermore Valley Groundwater Basin



In an effort to ensure that mailed notices and referrals from your agency make their way to the appropriate staff at Zone 7 in a timely manner, we are requesting that your databases / mailing lists are updated to reflect the following points of contact, specifically for routine development referrals and for CEQA / environmental reviews.

For CEQA / environmental review:	For development review / referral:
Zone 7 Water Agency **Attn: CEQA Review / Elke Rank** 100 North Canyons Parkway Livermore, CA 94551 ceqa@zone7water.com Staff contact: Elke Rank, erank@zone7water.com	Zone 7 Water Agency **Attn: Dev Referral / Steven Ellis** 100 North Canyons Parkway Livermore, CA 94551 reviewers@zone7water.com Staff contact: Steven Ellis, sellis@zone7water.com

6

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at erank@zone7water.com.

Sincerely,

Elke Rank

Elke Rank
cc: Carol Mahoney, Amparo Flores, Matt Katen, file

APPENDIX PH2

Public Hearing Transcripts from the January 9, 2020 Hearing, Coded

TABLE PH2-1
PERSONS COMMENTING ON THE RECIRCULATED PORTIONS OF THE ACRP DRAFT EIR

Comment Code	Name of Person and Agency Submitting Comments	Comment Format	Comment Date
Public Hearing Comments			
PH-Hidas	Laura Hidas, Manager of Water Resources, Alameda County Water District	Transcript	01/09/2020
PH-Fung	Commissioner Frank Fung	Transcript	01/09/2020

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SAN FRANCISCO

PLANNING COMMISSION

SFPUC ALAMEDA CREEK RECAPTURE PROJECT

Public Hearing on the Partial Recirculated

DRAFT ENVIRONMENTAL IMPACT REPORT

Thursday, January 9, 2020

1:00 o'clock p.m.

SAN FRANCISCO CITY HALL

One Dr. Carlton B. Goodlett Place

Room 400

San Francisco, California

Agenda Item No.: 12

Project No.: 2015-004827ENV

Reported by:

DEBORAH FUQUA, CSR #12948

APPEARANCES:

San Francisco Planning Commission:

Vice President Joel Koppel

Commissioner Katrin Moore

Commissioner Frank Fung

Commissioner Sue Diamond

Commissioner Millicent Johnson

Commission Secretary: Jonas Ionin

Commission Staff:

Chris Kern, Principal Environmental Planner

Tim Ramirez, Natural Resources Division Manager

---o0o---

STAFF PRESENTATION

PUBLIC COMMENT

Thursday, January 9, 2020 3:06 p.m.

--o0o--

P R O C E E D I N G S

COMMISSION SECRETARY IONIN: Commissioners, Item 12, Case Number 2013-004827-ENV, for the SFPUC Alameda Creek Recapture Project, Draft Environmental Impact Report. Please note that written comments will be accepted at the Planning Department until 5:00 p.m. on January 21st, 2020.

Excuse me, Chris.

(Discussion re Item 16 not reported)

COMMISSION SECRETARTY IONIN: Go ahead.

CHRIS KERN: Good afternoon. Chris Kern, Planning Department staff. And joining me are members of the SFPUC project team, including Tim Ramirez, Natural Resources Division Manager, who will provide a brief overview of the project, including recent changes to the proposed project operations following my presentation.

The item before you is a somewhat unusual one. It's the partial recirculation of the Draft EIR for the SFPUC's Alameda Creek Recapture Project. The proposed project, which is located on SFPUC watershed lands in Alameda County, would recapture water released from Calaveras Reservoir and bypassed around the Alameda

Creek Diversion Dam as part of a multi-agency effort to reestablish Central Coast steelhead in Alameda Creek.

As I mentioned, this hearing is on the recirculation of a portion of a previously certified EIR. The Draft EIR for this project was published on November 16th, 2016 and the Planning Commission certified the Final EIR on June 7, 2017. The Final EIR determined that the proposed project would not result in any significant and unavoidable impacts and found that potential impacts to archeological resources, air quality, biological resources, and energy resources could be mitigated to less than significant levels.

However, on September 19th, 2017, the Board of Supervisors reversed the certification in response to an appeal of the Final EIR by the Alameda County Water District. And the Board, in that action, directed the Department to undertake additional analysis of potential impacts on the steehead and recirculate that analysis for public review. The Board found all other aspect of the EIR to be adequate, accurate, and objective, requiring no further analysis.

The primary concern with the EIR's analysis of impacts on the steelhead focuses on the complex interactions between surface waters and groundwater in the project area. And because of the technical nature

of this topic, the Board also directed the staff to submit our analysis, our groundwater analysis, to a peer reviewer.

So per the Board's direction, the Department engaged Dr. Jean Moran, a groundwater expert and professor at Cal State East Bay with degrees in geochemistry, geophysics, geology, and physics to peer review the EIR's groundwater analysis. Based on Dr. Moran's initial review and feedback, our CEQA consultants substantially revised and expanded the EIR groundwater analysis. The revised analysis is included in the Recirculated EIR as Appendix HYD2R.

Dr. Moran's final peer review report is also included in the EIR as Appendix TPR-1. The peer review report concludes that the revised groundwater analysis contained in Appendix HYD2R adequately characterizes interactions between groundwater and surface water in the project area to support this EIR.

Since the Board's 2017 reversal of the EIR certification, the Planning Department and SFPUC Staff have also held numerous meetings on the project with the state and federal fisheries agencies as well as the Alameda Creek Fisheries Restoration Workgroup and Alameda County Water District.

In response to agency feedback, the SFPUC has

revised the proposed project to further limit pumping during the steelhead migration season. And Tim will provide an overview of these modifications in his presentation.

The recirculated portion of the EIR presents the proposed changes to the project operations and contains updated analysis of the project's impacts on steelhead migration in light of both the revised operations and the expanded groundwater analysis. Like the previously certified EIR, the Recirculated EIR concludes the project would not have significant impacts on the steelhead.

The recirculated portion of the Draft EIR was published on December 4 and the public review period closes on January 21st.

To date, we've received one comment letter from the Alameda County Water District, stating that the District will not submit any comments opposing the EIR if the SFPUC agrees to additional monitoring and reporting of project operations. SFPUC has expressed agreement in principle with this request and is working with the Water District on developing an acceptable mechanism to implement that agreement.

During today's hearings, staff will receive and record comments but will not respond to them.

Comments made today and all comments received during the comment period will be responded to in writing in the Responses to Comments document.

Comments today should be directed towards the adequacy and accuracy of the information contained in the Draft Recirculated EIR.

For members of the public who wish to comment at this hearing today, please submit a speaker slip and state your name for the record.

Written comments may be submitted to the department by e-mail or regular mail until 5:00 p.m. on January 21st.

When the Responses to Comments document is complete, the Department will provide copies to those who have made comments on the Draft Recirculated EIR. We will then return to the Commission to request certification of the EIR. If the EIR is certified, the SFPUC may consider approval of the project.

Now I'd like to introduce Tim Ramirez, who will provide a brief overview of the proposed project, including the recent modifications to the proposed project operations, after which I would recommend that you open the public hearing unless you have questions for staff at that point. Thanks.

VICE PRESIDENT KOPPEL: Thanks.

TIM RAMIREZ: Thank you, Chris.

Good afternoon, Commissioners. Tim Ramirez, Division Manager Natural Resources and Lands Management at SFPUC.

Can I have the slides quickly? Just a few to try to capture the summary of the project.

So this is one of many projects in our Water System Improvement Program. This project is focused on maintaining our water supply reliability to our customers. This Commission certified the programmatic document for this program in 2008, so we're coming to the end of almost a decade -- over a decade of work. This is one of the last projects.

And as Chris stated, the overview is to recapture a portion of the flows that we're releasing now from our reservoirs and bypassing from our diversion dam further upstream.

This is a very quick overview map. I'm going to have three and just continue to zoom in on the footprint of the project. This shows the entire Alameda Creek watershed boundary. We're focused on what is probably the peach color at the bottom, what we call the Southern watershed, where our reservoirs are. The northern watershed is the Livermore Valley. They meet together in Sunol and flow down through Niles

Canyon and then out to the Bay.

This is a zoom-in of our southern watershed. Calaveras Reservoir is on the right. San Antonio Reservoir is the other blue large body of water on the left. And in the canyon in between -- it's harder to see -- is the diversion dam. And we're talking about recapturing water released from the far right of the screen, flows going from the right to the left.

And here's Alameda Creek, and here's some of the quarry ponds that are left from aggregate mining. And in particular, we're talking about one of these ponds, F2; they're enclosed in the little red triangle. That's the pond from which we're proposing to pump water into our system.

So a quick description of some of the details. We're going to release -- we are releasing almost 15,000 acre-feet of water from our reservoirs downstream to support the anadromous fish that are coming hopefully in the near future and also the native species in the watershed. And the project is proposing to recapture some of that.

Initially, we proposed to recapture just over 7,000 acre-feet. And as Chris explained, we've reduced that a little bit now to roughly 6,000 acre-feet. And we'll talk about how that's being done in just a

minute. And again, we're talking about pumping it from this pit. We're not talking about building something into the creek and pulling surface water from the creek at all. This is a pit that's off-stream.

This is probably the key chart. And in the middle, the original column is what was initially proposed in the first round of the EIR, and on the left is the new proposal. And in summary, the no-pumping period has been expanded both earlier into the winter and then further into the spring.

And the idea, out of an abundance of caution in response to the agencies' comments -- this is the State Fish and Wildlife Department and the National Marine Fishery Service on the federal side -- is to really make sure we're not doing anything when there's water in the creek that might affect fish.

So the adults are coming back in the winter. We want to make sure we're not affecting their ability to migrate upstream when there's water in the creek. And then in the end, in the spring, the young fish are moving downstream, and we don't want to do anything then as well.

The last two months there, in May and then in June, there's some conditions about whether we can or can't pump. And again, we're being very cautious. We

wanted to make sure that there's no flow in the creek at all above the project site. So if there's any water in the creek at all, we're not pumping. And then we're also talking about restricting the elevation of the pump a little further as well, which I'll show in the next slide.

And this is the last slide. This a cross-section. Alameda Creek is on the left, perched above what is the larger pit of two. And the key elevation here is that little hatched area of blue where the elevation is 225. We don't want to get below that because we don't want to have the water flow the other direction, away from the creek. That's the bottom line.

So we're trying to be very careful and make sure we don't upset the migration period, both in the winter and especially in the spring, when young fish are out migrating. And that's really the biggest change in the project.

I'm happy to answer questions if you have any. I'll be here as well for questions later. Thank you for the time.

VICE PRESIDENT KOPPEL: Thank you.

I'd like to open this up for public comment. I have one speaker, Laura Hidas. Anyone else who would

like to address us, please line up on the screen side of the room.

LAURA HIDAS: Good afternoon. My name is Laura Hidas, and I'm the manager of Water Resources at the Alameda County Water District or ACWD. ACWD serves the cities of Fremont, Newark, and Union City in southern Alameda County. Thank you for the chance to supplement the initial written comments we submitted on January 2nd on the Alameda Creek Recapture Project.

ACWD supports the concept of the project because, as a large customer of SFPUC, a reliable regional water system is consistent with our best interests as well.

ACWD and SFPUC have a long history of working together on a variety of important regional projects and have collaborated extensively through the Alameda Creek Fisheries Work Group toward reestablishing a steelhead fishery in the Alameda Creek watershed.

Because ACWD operates facilities on the Alameda Creek downstream of the project, we are uniquely familiar with and, in the past, have expressed concerns about some aspects of the project.

We have continued to work with staff at both SFPUC and San Francisco Planning Department to better understand this complex project. And your staff is to

be commended for their informative presentation to the Fisheries Work Group on September 12th, 2019.

Since that time, we appreciate that staff has been responsive to our requests for information as we continue to review the Recirculated EIR. Based on our initial analysis, the revised project description and operating parameters will be more protective of steelhead and downsteam water supplies than the previous proposal, as long as SFPUC fully complies with the project description and operating protocols described in the Recirculated EIR.

In the December 31st letter to Planning Staff, ACWD requested that specific commitments for monitoring and reporting be incorporated into the project and a mitigation monitoring and reporting program. ACWD considers its requests to be reasonable, and we ask that the Planning Department -- the Planning Commission and Staff include commitments in the EIR to implement and operate the project as described to the Fisheries Work Group and in the Recirculated EIR and perform monitoring and provide compliance data to all watershed stakeholders to ensure the project is operated as described.

ACWD believes that transparent monitoring and data sharing can help build greater trust among all

PH-Hidas-1

stakeholders who share the common goal of improving conditions for steelhead. Most importantly, ACWD will not oppose the Recirulated EIR if the project can include the requested monitoring and reporting.

We remain open to working with Planning and SFPUC Staff to clarify any of our comments on the proposed project operations prior to the comment deadline.

Thank you for your consideration of ACWD's requests, and we appreciate the continued coordination in the Alameda Creek watershed on these important issues. Thank you very much.

VICE PRESIDENT KOPPEL: Thank you.

COMMISSION SECRETARY IONIN: If there's no other public comment, Commissioners may wish to chime in. If not, we can move on to the next item.

VICE PRESIDENT KOPPEL: Commissioner Fung?

COMMISSIONER FUNG: Question then for Staff. This monitoring program would be a mitigation, then?

CHRIS KERN: Chris Kern, Planning Department Staff.

No, it wouldn't be a mitigation measure because we could only impose mitigation in response to a significant impact under CEQA. The Water District, in their comment letter, requested that we include the

PH-Hidas-1 cont.

PH-Fung-1

additional monitoring and reporting requirements in the mitigation, monitoring, and reporting program for the project, the MMRP.

We're not sure that that's the right mechanism, but the PUC and Water District have had some conversations around that and have proposed alternative mechanisms through which the additional monitoring and reporting can be assured. And we're still working out the details on how to accomplish that.

COMMISSIONER FUNG: That appears to be the -- an operational element there is really something between the two water agencies -- than with the EIR.

CHRIS KERN: That is the Planning Department's view of their request.

COMMISSIONER FUNG: Okay.

VICE PRESIDENT KOPPEL: And just a reminder to the public, written comments will be accepted until 5:00 p.m. on January 21st of this year.

COMMISSION SECRETARY IONIN: Very good, Commissioners. Seeing nothing further, we can move on.

(Whereupon, the proceedings concluded at 3:21 p.m.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, DEBORAH FUQUA, a Certified Shorthand Reporter of the State of California, do hereby certify that the foregoing proceedings were reported by me, a disinterested person, and thereafter transcribed under my direction into typewriting and which typewriting is a true and correct transcription of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named, nor in any way interested in the outcome of the cause named in said caption.

Dated the 24th day of January, 2020.

DEBORAH FUQUA

CSR NO. 12948