



DIRECTORS

43885 SOUTH GRIMMER BOULEVARD • FREMONT, CALIFORNIA 94538

MANAGEMENT

(510) 668-4200 • FAX (510) 770-1793 • www.acwd.org

AZIZ AKBARI  
JAMES G. GUNTHER  
JUDY C. HUANG  
PAUL SETHY  
JOHN H. WEED

ED STEVENSON  
General Manager  
KURT ARENDS  
Operations and Maintenance  
LAURA J. HIDAS  
Water Resources  
TBD  
Engineering and Technology Services  
JONATHAN WUNDERLICH  
Finance

July 19, 2021

MTC Public Information ([aircomments@bayareametro.gov](mailto:aircomments@bayareametro.gov))

Attn: Draft EIR Comments  
375 Beale Street, Suite 800  
San Francisco, CA, 94105

To whom it may concern:

Subject: Draft Plan Bay Area 2050, A Vision for the Future and Draft Environmental Impact Report for Draft Plan Bay Area 2050, A Vision for the Future

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Draft Plan Bay Area 2050, A Vision for the Future (Draft Plan) and Draft Environmental Impact Report (Draft EIR) for the Draft Plan.

**Comments for the Draft Plan:**

1. Sea Level Rise Adaptation Approaches, Page 94

ACWD appreciates that the Draft Plan considers a number of approaches to protect, restore, and/or create ecosystems in response to projected sea-level rise and inundation. ACWD recommends that the Draft Plan be updated to also consider the impacts from seawater inundation into coastal aquifers due to sea-level rise, including threats to housing and infrastructure, damage to pipelines and sewage systems, and mobilization of shallow groundwater contamination.

**Comments for the Draft EIR:**

1. Section 3.10, “Hydrology and Water Quality”

- a. *Section 3.10.2, “Regulatory Setting,” Page 3.10-14*

The Draft Plan states that the Sustainable Groundwater Management Act (SGMA), “requires all groundwater basins found to be of “high” or “medium”

priority to prepare Groundwater Sustainability Plans (GSPs).” Please clarify that Groundwater Sustainability Agencies (GSAs) managing medium- or high-priority groundwater basins may also submit an Alternative to a GSP. Please ensure that any requirements or actions specified for a GSP are revised to specify, “GSP or Alternative to a GSP” throughout the Draft Plan.

*b. Section 3.10.3, “Impact Analysis,” Page 3.10-24*

ACWD appreciates the inclusion of Impact HYDRO-1 to consider the potential degradation of groundwater quality from the construction and operation activities proposed as part of the Draft Plan. However, the discussion in Impact HYDRO-1 focuses on impacts to surface water quality and subsequent infiltration into groundwater; as stated on Page 3.10-24, “The discussion is focused on potential adverse effects on surface water quality associated with discharge to waters listed under Section 303(d) of the CWA.” ACWD recommends that discussion in Impact HYDRO-1 include the evaluation of the potential for subsurface construction activities (e.g., drilling of piles or piers) to introduce contamination found in shallower soil and/or groundwater directly into deeper aquifers which may serve as sources of drinking water.

2. Section 3.14.3, “Impact Analysis”

*a. Section 3.14.3, “Impact Analysis,” Page 3.14-37*

ACWD appreciates the inclusion of Impact PUF-1 to consider the potentially significant adverse impacts if it would require or result in the relocation or construction of new or expanded water facilities, the construction or location of which could cause significant environmental effects as part of the Draft Plan. In addition, ACWD recommends this section also address and include the potential replacement of existing water facilities not associated with new or relocated facilities, which may be a requirement of any proposed new development and could result in significant environmental effects.

3. Section 3.14, Public Utilities and Facilities

*a. Section 3.14, Public Utilities and Facilities, Page 3.14-1*

Water Supply: This section evaluates impacts to water suppliers by relying on analyses that aggregate water agencies’ projected 2040 populations, as identified in their respective 2015 Urban Water Management Plans (UWMPs), to conclude that their total population projections exceed the regional population projections under the proposed Plan Bay Area 2050. However, since those UWMPs were written, there have been additional water supply uncertainties, proposed revisions to state regulations, and other agency-specific changes that affect water supply

planning forecasts that may not be reflected in the UWMPs. Furthermore, the growth projections ACWD used in the 2020 UWMP relied on the initial Draft Plan Bay Area 2050 population projections, and this has been updated while finalizing the UWMP. Therefore, ACWD cannot confirm whether or not the Plan will result in water supply impacts to ACWD's service area based on the information provided in the Plan. ACWD will monitor future development within our service area, will make prudent investments in water supplies and additional conservation when appropriate, and may implement requirements for growth within our service area to provide additional water conservation measures or water supply investments to meet future demands.

*b. Section 3.14, Public Utilities and Facilities, Page 3.14-36*

UWMP and Water Supply: ACWD recommends that the final Plan Bay Area 2050 include the most recent 2020 UWMP water supply data from regional agencies. Also, ACWD recommends that it would be beneficial for future Plan Bay Area cycles to be adjusted to better align with the UWMP cycles.

Thank you again for the opportunity to comment on the Draft Plan and EIR. For further discussions about these comments or about ACWD's water resources, please contact Laura Hidas, Director of Water Resources, at (510) 668-4441 or at [laura.hidas@acwd.com](mailto:laura.hidas@acwd.com). We look forward to coordinating further with you on this Plan.

Sincerely,



Ed Stevenson  
General Manager

ko/tf

By FedEx and Electronic Submittal

cc: Laura Hidas, ACWD  
Thomas Niesar, ACWD  
Michelle Myers, ACWD  
Juniet Rotter, ACWD  
Tom Francis, BAWSCA