

July 20, 2021

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

Sent by e-mail to: [eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov)

**Re: Draft Plan Bay Area 2050, and Draft EIR for Plan Bay Area 2050 (SCH# 2020090519)**

Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced documents in the context of Zone 7's mission to "Deliver safe, reliable, efficient, and sustainable water and flood protection services" within the Livermore-Amador Valley.

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](mailto:erank@zone7water.com).

Sincerely,



Elke Rank

cc: Carol Mahoney, Amparo Flores, file

Attachments: (1) Comments on Plan Bay Area 2050  
(2) Comments on Draft EIR for Plan Bay Area 2050

## **Attachment 1: Comments on Draft Plan Bay Area 2050**

**Recommended Coordination with Preparation of UWMPs.** As a water wholesaler serving the Cities of Dublin, Livermore, and Pleasanton in eastern Alameda County and a portion of the City of San Ramon in Contra Costa County, Zone 7 relies largely on city planning documents for our planning for water supply and flood protection system improvements and expansion.

Among other planning documents, our long-term plans for water supply are formally documented in Urban Water Management Plans (UWMPs) (Zone 7's latest plan is the 2020 Urban Water Management Plan available here:

[https://www.zone7water.com/sites/main/files/file-](https://www.zone7water.com/sites/main/files/file-attachments/0_final_2020_uwmp.pdf?1624903044)

[attachments/0\\_final\\_2020\\_uwmp.pdf?1624903044](https://www.zone7water.com/sites/main/files/file-attachments/0_final_2020_uwmp.pdf?1624903044)). UWMPs are required by the State of California to be prepared every five years and submitted in years ending in 1 and 6 (thus, our 2020 UWMP was submitted in spring of 2021). Zone 7 uses the cities' latest available General Plans, Specific Plans, and other formal housing projections to inform the UWMP.

Given the timing of various local and regional planning efforts and release of public documents, there will be inconsistencies in various planning documents related to growth (commercial and housing developments). In particular, the latest housing projections from the Regional Housing Needs Allocation process and Draft Plan Bay Area 2050 have not been incorporated into the cities' planning documents, and therefore are not reflected in the latest UWMPs. It may be helpful in the future if the Plan Bay Area Updates could be coordinated/synchronized to occur prior to UWMP updates to avoid a disconnect. For our part, we will continue to track developments as they are approved by the cities and incorporate them into our planning efforts.

**Lacking Discussion on Climate Change as it relates to water supply and flood resiliency.** The Draft Plan states that coordinated action at the regional level is needed to adapt to sea level rise (SLR). Lacking in the Plan, however, is a need for coordinated adaptation to climate change overall. In addition to SLR, climate change in the coming decades (e.g., higher temperatures, change in storm patterns, etc.) may have major effects on the Bay Area's water supply and flood protection, for example, leading to a need for enhanced land use planning.

**Lacking Discussion on Water and Flood Infrastructure.** The Plan is lacking discussion of ageing storm and flood infrastructure in such areas where infill would occur. Also, infrastructure in some areas is already undersized and may not be able to withstand significant additional pressures from new development – not to mention additional pressure from climate change. Major investments may be required to update infrastructure to current standards, not to mention expanded capacity.

**Attachment 2: Comments on Draft EIR for Plan Bay Area 2050**

<i>DEIR Topic/Page</i>	<i>Comment(s)</i>
<b>General</b>	
Preface	<ul style="list-style-type: none"> <li>Consider including in the DEIR an informational preface for users to point out that there will be inconsistencies in various planning documents they may come across. Every local agency likely has multiple planning documents; the respective age of the plan, planning objective(s), available data / resources at the time, and other factors may result in inconsistencies in specific information like population projections or water supply demands.</li> </ul>
<b>Climate Change</b>	
<p><b>Page 3.10-2:</b> Table 3.10-1 shows the average monthly precipitation for selected Bay Area sites.</p>	<ul style="list-style-type: none"> <li>This table excludes the East Bay entirely; consider adding one East Bay location for completeness.</li> <li>Consider highlighting the more recent climate trends in the DEIR, perhaps in this table or elsewhere. Some of the wettest and the driest years have all occurred in the last decade; this more recent change in precipitation pattern is important for water resources managers and may require updated water supply planning and/or operations, as well as building new facilities, or replacing ageing ones, to support growth.</li> </ul>
<b>Groundwater</b>	
<p><b>Page 3.10-31:</b> "Concentrating development within urban cores, as proposed by the Plan, could reduce the groundwater recharge effects."</p>	<ul style="list-style-type: none"> <li>Groundwater recharge may have varying degrees of importance in terms of supporting population growth, regardless of their proximity to the urban cores; The DEIR should consider that impacts may need to be avoided or further reduced <u>specifically</u> for groundwater basins that are heavily relied upon for water supply and perhaps also those supporting groundwater dependent ecosystems.</li> </ul>
<p><b>Page 3.10-32:</b> "The GSPs are required to provide mechanisms that allow the sustainable use of groundwater, with growth projections considered. Therefore, the regional impacts of implementation of the Plan on sustainable groundwater management would be less than significant (LTS)."</p>	<ul style="list-style-type: none"> <li>The analysis relies heavily on implementation of SGMA and LID regulations/projects to protect groundwater resources. However, not all Groundwater Sustainability Agencies (GSA) have local land use authority, and in some cases there is a disconnect between the decision makers for land use development and groundwater management.</li> </ul>

<p><b>Page 3.10-14:</b> The Draft EIR states that the SGMA requires preparation of Groundwater Sustainability Plans (GSPs).</p>	<ul style="list-style-type: none"> <li>• Please clarify that Groundwater Sustainability Agencies (GSAs) managing medium- or high-priority groundwater basins may also submit an Alternative to a GSP. Ensure that any requirements or actions specified for a GSP are revised to specify, "GSP or Alternative to a GSP" throughout the Draft EIR.</li> <li>• The project area is situated within the Livermore Valley Groundwater Basin; as such, the underlying groundwater is subject to the management provisions of the basin's Alternative Groundwater Sustainability Plan (GSP), which was prepared by Zone 7 Water Agency and approved by the State Department of Water Resources in 2019. As the designated Groundwater Sustainability Agency (GSA), Zone 7 strives to maintain sufficient groundwater supplies and good groundwater quality within the groundwater basin. To support these goals, the project needs to be consistent with the Alternative GSP and Zone 7's Sustainable Groundwater Management Ordinance, as well as the State's Water Recycling Policy (and associated orders), and the County's Water Wells Ordinance. Links to many of these documents can be found on Zone 7's website at <a href="https://www.zone7water.com/">https://www.zone7water.com/</a>.</li> </ul>
<p><b>Page 3.10-5:</b> "Groundwater is used for numerous purposes, including municipal and industrial water supply, in the Bay Area; however, it accounts for only about 5 percent of total water consumption."</p>	<ul style="list-style-type: none"> <li>• Some counties or regions are much more dependent on groundwater resources than others, and the statement that it accounts for only about 5 percent of total water consumption may diminish its relative importance for some communities. Further, it's unclear if the assessment of water includes agricultural (irrigation and related domestic) use, which is especially important in areas including Sonoma and Napa counties with major agricultural economies.</li> <li>• The importance of protecting groundwater basins cannot be overstated. More agencies are looking at groundwater basins as a local and drought supply source, and the dependence on groundwater will become more significant in the near future.</li> </ul>
<b>Public Utilities and Facilities</b>	
<p><b>Page 3.14-38:</b> DEIR assumes that the infill nature of the proposed Plan's development pattern would</p>	<ul style="list-style-type: none"> <li>• DEIR is lacking discussion of ageing storm and flood infrastructure in such areas where infill would occur. Also, infrastructure in some areas is already undersized and may not be able to withstand significant additional pressures</li> </ul>

<p>result in less-than-significant impacts on the stormwater capacity of existing systems because much of the growth would occur on already impervious land.</p>	<p>from new development. Major investments may be required to update infrastructure to current standards, not to mention expanded capacity. Those projects, in turn, could have environmental impacts.</p>
<p><b>Page 3.14-43:</b> DEIR states that major water suppliers in the region are projected to be able to supply adequate water for their projected service populations through 2040 during normal years</p>	<ul style="list-style-type: none"> <li>• The final Plan Bay Area 2050 should include the most recent 2020 UWMP water supply data and population projections from regional agencies. It may be helpful in the future if the Plan Bay Area Updates could be coordinated/synchronized to occur prior to UWMP updates to avoid a disconnect.</li> </ul>