



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

June 5, 2017

MTC Public Information
375 Beale Street, Suite 800
San Francisco, CA, 94105
E-Mail: eircomments@mtc.ca.gov

Re: Draft Plan Bay Area 2040

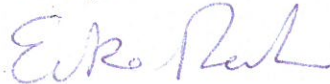
Zone 7 Water Agency (Zone 7) has reviewed the referenced Plan and Draft Environmental Impact Report (EIR) in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. We have a few comments for your consideration:

1. The Draft Plan Bay Area 2040 document does not explicitly address the serious role of water management and the health of San Francisco Bay as a major priority for Bay Area communities. The recent drought, followed by severe storms in 2017 that damaged many homes and water management infrastructure, has demonstrated the importance of considering water supply and management in future planning scenarios. Housing, job growth, and transportation are inextricably linked to and influenced by management of our natural resources. This may be especially true in areas like eastern Alameda County where opportunities still remain for natural creeks, open space, and ecological richness.
2. The Livermore area has some of the last remaining open areas in the northern Alameda Creek watershed that can serve as natural attenuation for stormwater. Transit developments in the area should carefully consider not only the impacts of their immediate footprint, but also consider downstream impacts that so often result from urban development. The Arroyo de la Laguna in Pleasanton is the major waterbody carrying all stormwater out of the valley, and many would consider it to be in a state of over-stress. Please work with city and stormwater managers to fully assess the regional implications of major new developments.
3. As much as 90% of the valley's drinking water is imported from the State Water Project every year. Whenever possible, Zone 7 carefully releases water to local creeks, like Arroyo Mocho, Arroyo del Valle, and Altamont Creek, to fill the groundwater aquifer for use in future years. This is a critical source of local (and emergency) supply. It's imperative that major transit developments, that in turn lead to housing and job growth, carefully evaluate the impacts on the quality and quantity of groundwater resources that may occur as a result of developments near these and tributary arroyos. Please work with water supply and groundwater managers to fully assess the regional implications of major new developments.
4. In many cases, there will be an inherent disconnect between the local or regional implications on water supply, stormwater quality, and flood protection, and the agency responsible for mitigating project impacts. Regional or statewide agencies, like Caltrans or BART, could implement large

projects that result in a shift in housing and job growth as a result of this Plan. These agencies will likely only mitigate for site specific construction impacts, and it will be the cities and/or local water agencies that will be burdened with additional costs associated with the change in regional water supply and stormwater management. The EIR should acknowledge and assess how implementation of this Plan could result in local impacts on water supply and water management that will not be (immediately) mitigated.

On behalf of Zone 7, I 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

cc: Carol Mahoney, Amparo Flores, Joe Seto, file