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DEADLINE, BY NOON, PURSUANT TO ADMIN.
CODE, SECTION 31.16(b)(5)
(Note: Pursuant to California Government Code, Section
66009(b)(2), information received at, or prior to, the public
hearing will be included as part of the official file.)

September 1, 2017

London Breed, President
San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors
#1 Dr. Carlton B. Goodlett Place
Room #244
San Francisco, CA 94102

Subject: Tuesday, September 5, 2017, Appeal Hearing for the Certification of Final Environmental Impact Report (EIR) for the Alameda Creek Recapture Project - File No. 170893

Dear President Breed and Board Members:

On August 28, 2017, the Alameda County Water District (ACWD) received the San Francisco Planning Department memorandum for the Appeal of Final EIR for the SFPUC Alameda Creek Recapture Project that is scheduled for September 5, 2017. ACWD writes to provide our comments to the recommendation in the Planning Department memorandum and to request a modification to that recommendation.

The Planning Department memorandum makes the following recommendation:

The Planning Department, therefore, recommends that the Board reverse the certification of the EIR but requests that the Board find the Final EIR adequate, accurate, and objective in all respects except the one issue of operational impacts of the project on threatened CCC steelhead as a result of project-induced effects on streamflow in Alameda Creek The Planning Department will recirculate a portion of the Draft EIR to address this single issue.

ACWD agrees with the Planning Department recommended action to reverse the certification of the EIR. ACWD appreciates that the Planning Department acknowledges the need to analyze the operational impacts of the project on the federally listed threatened steelhead. ACWD also agrees with the Planning Department recommendation that only some portions of the EIR need to be recirculated.

However, ACWD believes that the portion of the EIR that the Planning Department proposes to recirculate is too narrow. In order to analyze the operational impacts of the project due to project-induced effects on streamflow in Alameda Creek, it is necessary to evaluate the interaction between surface water and groundwater using a more appropriate methodology than what was used in the EIR.



The United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS), in its July 27, 2017, letter to the Board of Supervisors specifically requested that San Francisco "*undertake additional analysis to examine the relationship between groundwater and surface water in the Sunol Valley for the purpose of determining the project's potential impacts on the daily time step to streamflows in Alameda Creek downstream of the project site.*" The Planning Department memorandum specifies that this request will not be addressed as part of what the Planning Department will recirculate. ACWD strongly disagrees with this portion of the Planning Department recommendation.

ACWD and NMFS are not alone in recognizing the need to analyze further the surface water and groundwater interactions – several organizations have made this request as well, and those letters were included in ACWD's August 25, 2017, submittal. Since the August 28 Planning Department memorandum was distributed, three other governmental agencies submitted letters expressing concern about the impacts of the project. Alameda County Supervisor Richard Valle submitted a letter on August 30 requesting that San Francisco staff work collaboratively with the agencies and special districts operating in the Alameda Creek watershed so that the project meets the needs of all stakeholders while promoting the recovery of the federally threatened CCC steelhead. Alameda County Flood Control and Water Conservation District, Zone 7 (Zone 7), as the exclusive local agency with the authority to comply with the Sustainable Groundwater Management Act within its boundaries, and the groundwater basin involved with the project is within Zone 7's boundaries, submitted a letter on August 29. Zone 7's letter states that the potential impacts of the project on groundwater raise significant concerns, and notes that groundwater sustainability can be a "precarious balance of surface water and groundwater interactions." Alameda County Flood Control and Water Conservation District, Flood Control, submitted a letter on August 31 expressing concern that the EIR does "not adequately address the project's impacts on groundwater elevations and surface flows in Alameda Creek."

These letters are attached for your ready reference.

Therefore, ACWD believes that all the sections of the EIR that address hydrology, methodology, and surface water groundwater interaction must be revised and recirculated as set forth below.

Based on ACWD's review of the Planning Department memorandum, ACWD requests that the Board of Supervisors:

1. Reverse the certification of the EIR.
2. Instruct the Planning Department and SFPUC:
 - A. to work with ACWD, NMFS, fisheries experts, groundwater experts, and other stakeholders in the Alameda Creek watershed to develop a modeling methodology using daily flow data that provides additional analysis of the groundwater and surface water interactions in the Sunol Valley to determine the impacts of the project; and
 - B. to revise and recirculate the following portions of the EIR:

- Chapter 3: Project Description
 - 3.6.1 Proposed Operations
 - 3.6.2 Integration of ACRP with Operation of Existing Facilities in the SPFUC
- Chapter 5: Environmental Setting, Impacts, and Mitigation Measures
 - 5.14.5, 5.14.6, and 5.14.7 Biological Resources – Fisheries
 - 5.16 Hydrology and Water Quality
- Appendix BIO2 – Alameda Creek Fisheries Habitat Assessment Report
- Appendix HYD-1 – Surface Water Hydrology Report
- Appendix HYD-2 – Groundwater / Subsurface Water Interactions Technical Memorandum

ACWD has submitted to the Clerk of the Board a modification to one of the sample Motions posted on the public website in order to incorporate ACWD's request for revision and recirculation of the EIR on a broader number of issues, and ACWD has attached to this letter that revised Motion.

As ACWD has stated before, ACWD supports the Alameda Creek Recapture Project – it just needs to be analyzed and implemented the right way.

Sincerely,



Robert Shaver
General Manager

la/tf

Attachments: Letters from concerned stakeholders, including:

- Alameda County Supervisor Richard Valle
- Alameda County Flood Control and Water Conservation District, Zone 7
- Alameda County Flood Control and Water Conservation District, Flood Control Modified Motion

cc: John Rahaim, San Francisco Planning Department
Lisa Gibson, San Francisco Planning Department
Chris Kern, San Francisco Planning Department
Steve Ritchie, San Francisco Public Utilities Commission
Ellen Levin, San Francisco Public Utilities Commission
Nicole Sandkulla, Bay Area Water Supply and Conservation Agencies (BAWSCA)
Daniel Woldesenbet, Alameda County Public Works
Hank Ackerman, Alameda County Public Works
Gary Stern, National Marine Fisheries Service
Eric Larson, California Department of Fish and Wildlife
Jeff Miller, Alameda Creek Alliance
Tom Engels, Horizon Water
Patrick Miyaki, Esq. Hanson Bridgett LLP
Brett Gladstone Esq. Hanson Bridgett LLP

FILE NO.

MOTION NO.

1 [Preparation of Findings to Reverse the Final Environmental Impact Report Certification –
2 Alameda Creek Recapture Project]

3

4 **Motion directing the Clerk of the Board to prepare findings related to reversing the**
5 **Planning Commission's certification of the Final Environmental Impact Report for the**
6 **San Francisco Public Utilities Commission's proposed Alameda Creek Recapture**
7 **Project.**

8

9 WHEREAS, The San Francisco Public Utilities Commission (SFPUC) approved the
10 Alameda Creek Recapture Project (the Project) by Resolution No. 17-0146 on June 23, 2017;
11 and

12 WHEREAS, The Project proposes to recapture water that will be released from
13 Calaveras Reservoir and/or bypassed around the Alameda Creek Diversion Dam (ACDD) when
14 the SFPUC implements the instream flow schedules required as part of the regulatory permits
15 for future operations of Calaveras Reservoir; and

16 WHEREAS, Released and bypassed water will flow naturally down Alameda Creek
17 through the Sunol Valley and will percolate into and collect in a quarry pit referred to as Pit F2
18 that is currently leased to Mission Valley Rock Company for water management activities
19 related to aggregate mining activities; and

20 WHEREAS, The SFPUC would recapture water collected in Pit F2 by pumping it to
21 existing SFPUC water supply facilities in the Sunol Valley for treatment and eventual distribution
22 to its water supply customers in the Bay Area; and

23 WHEREAS, The Planning Department determined that an Environmental Impact Report
24 (hereinafter "EIR") was required for the proposed Project and provided public notice of that
25 determination by publication in a newspaper of general circulation on June 24, 2015; and

1 WHEREAS, The Planning Department published a Draft EIR for the proposed Project on
2 November 30, 2016, and circulated to local, state, and federal agencies and to interested
3 organizations and individuals for a 45-day public review period that was later extended for two
4 weeks by the Planning Department, resulting in a 62-day public review period that ended on
5 January 30, 2017; and

6 WHEREAS, The Planning Commission held a public hearing on the Draft EIR on
7 January 5, 2017; and

8 WHEREAS, The Planning Department prepared a Responses to Comments document
9 (RTC), responding to all comments received orally at the public hearings and in writing, and
10 published the RTC on June 7, 2017; and

11 WHEREAS, On June 22, 2017, the Planning Commission, by Motion No. 19952,
12 certified a Final Environmental Impact Report (Final EIR) for the proposed Project under the
13 California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq.,
14 the CEQA Guidelines, 14 California Code of Regulations, Section 15000 et seq., and San
15 Francisco Administrative Code Chapter 31, finding that the Final EIR reflects the independent
16 judgment and analysis of the City and County of San Francisco, that it is adequate, accurate
17 and objective, and contains no significant revisions to the Draft EIR; and

18 WHEREAS, By letter to the Clerk of the Board, received by the Clerk's Office on July 24,
19 2017, Robert Shaver, General Manager, on behalf of the Alameda County Water District,
20 appealed the Final EIR certification ("Appellant"); and

21 WHEREAS, The Planning Department's Environmental Review Officer, by memorandum
22 to the Clerk of the Board dated July 26, 2017, determined that the appeal had been timely filed;
23 and

24 WHEREAS, By letter to the Clerk of the Board, received by the Clerk's Office on August
25 25, 2017, Appellant provided a supplemental appeal letter and supporting documentation; and

1 WHEREAS, By letter to the Clerk of the Board, received by the Clerk's Office on July 27,
2 2017, the National Marine Fisheries Service stated its belief that the Final EIR does not contain
3 sufficient information to conclude that the Project will not result in substantial effects on CCC
4 steelhead and recommended the Planning Department and SFPUC "undertake additional
5 analysis to examine the relationship between groundwater and surface water in the Sunol
6 Valley" to determine impacts downstream of the project; and

7 WHEREAS, By letters to the Clerk of the Board, received by the Clerk's Office, a number
8 of other governmental agencies and elected officials, including Alameda County Flood Control
9 and Water Conservation District, Zone 7, Alameda County Flood Control and Water
10 Conservation District and County of Alameda Supervisor, Richard Valle raised concerns about
11 impacts to CCC steelhead and the analysis used in the Final EIR.

12 WHEREAS, By letters to the Clerk of the Board, received by the Clerk's Office, a number
13 of non-governmental environmental organizations including Alameda Creek Alliance, California
14 Trout and Trout Unlimited also commented that the Final EIR does not sufficiently analyze
15 impacts to CCC steelhead and that a methodology that addresses the relationship between
16 groundwater and surface water is required; and

17 WHEREAS, By memorandum, received by the Clerk's Office on August 28, 2017, the
18 Planning Department provided a response to the appeal of the Final EIR, recommending that
19 the Board reverse the certification of the EIR related to the analysis of the operational impacts of
20 the Project on federally threatened CCC steelhead; and

21 WHEREAS, By letter to the Clerk of the Board, received by the Clerk's Office on
22 September 1, 2017, Appellant provided a supplemental appeal letter in reply to the Planning
23 Department August 28, 2017, response memorandum; and

24 WHEREAS, On September 5, 2017, this Board held a duly noticed public hearing to
25 consider the appeal of the Final EIR certification filed by Appellant and, following the public

1 hearing, reversed the Final EIR certification, subject to the adoption of written findings in support
2 of such determination; and

3 WHEREAS, In reviewing the appeal of the Final EIR certification, this Board reviewed
4 and considered the determination, the appeal letters, the responses to the appeal documents
5 that the Planning Department prepared, the other written records before the Board of
6 Supervisors and all of the public testimony made in support of and opposed to Final EIR
7 certification; and

8 WHEREAS, Following the conclusion of the public hearing, the Board of Supervisors
9 reversed the Final EIR certification on the basis that there needs to be additional analysis of the
10 relationship between groundwater and surface water in the Sunol Valley to determine impacts to
11 CCC steelhead downstream of the Project, and the Board instructed the Planning Department
12 to undertake that analysis and to revise and recirculate Sections 3.6.1, 3.6.2, 5.14.5 through
13 5.14.7, 5.14.16, Appendix BIO2, Appendix HYD-1 and Appendix HYD-2 of the Final EIR, subject
14 to the adoption of written findings of the Board in support of such determination, based on the
15 written record before the Board of Supervisors as well as all of the testimony at the public
16 hearing in support of and opposed to the appeal; and

17 WHEREAS, The written record and oral testimony in support of and opposed to the
18 appeal and deliberation of the oral and written testimony at the public hearing before the Board
19 of Supervisors by all parties, and the public in support of and opposed to the appeal of the Final
20 EIR certification, is in the Clerk of the Board of Supervisors File No. 170893 and is incorporated
21 in this motion as though set forth in its entirety; now, therefore, be it

22 MOVED, That this Board of Supervisors directs the Clerk of the Board to prepare the
23 findings directing the Planning Department to revise the methodology used in the EIR to analyze
24 the effect of the interaction of surface water and groundwater in the Sunol Valley on CCC
25 steelhead downstream of the Project, and to revise and recirculate Sections 3.6.1, 3.6.2, 5.14.5

- 1 through 5.14.7, 5.14.16, Appendix BIO2, Appendix HYD-1 and Appendix HYD-2 of the Final
- 2 EIR.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404-4731

July 27, 2017

Clerk of the Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

Re: June 22, 2017 Planning Commission Decision Regarding the Final Environmental Impact Report for the Alameda Creek Recapture Project

Dear Clerk of the Board of Supervisors:

NOAA's National Marine Fisheries Service (NMFS) has been notified of the San Francisco Planning Commission's June 22, 2017 decision to certify the Final Environmental Impact Report (EIR) for the Alameda Creek Recapture Project (ACRP). NMFS previously submitted comments regarding the ACRP Draft EIR (Planning Department File No. 2015-004827ENV) via letter dated January 30, 2017, and we have reviewed the Responses to Comments document dated June 7, 2017.

Based on our review of the Final EIR, NMFS believes the document does not contain sufficient information to conclude the ACRP will not result in substantial effects on streamflows that support the migration of CCC steelhead in Alameda Creek. Streamflow simulation results presented in Figure 5.14-9 of the Draft EIR predict hydrologic conditions at a daily time-step, but it is unclear if this plot represents a comparison of "with project" to "without project" conditions. Table HYD6-2 of Appendix HYD1 offers some information regarding predicted changes in streamflows and this table indicates May flows will be reduced by approximately 30 percent with ACRP operations. The conclusion regarding potential impacts to steelhead migration presented in the EIR is based on an analysis of the "long-term" operation of the ACRP which doesn't fully take into account short-term impacts (*i.e.*, dry water years) and, as a result, the analysis presented in the EIR could significantly underestimate potential impacts to steelhead and migratory habitat.

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Furthermore, the EIR asserts that steelhead migration will not be impacted by the ACRP because, for both with and without project scenarios, "precipitation-generated streamflows in Alameda Creek are predicted to exceed several hundred cubic feet per second during the December through June migration period¹." This reasoning fails to consider that steelhead do not migrate only during peak flow events, but may migrate anytime within the migration period when instream flows exceed identified minimum flow levels (*i.e.*, 25 cfs for adults, 12 cfs for juvenile/smolt in lower Alameda Creek). A more appropriate impact analysis would instead

¹ Response to Comments, page 11.4-32; and Draft EIR, page 5.14-126.



focus on changes in the amount of time flows exceed these minimum migration thresholds. In light of this comment, NMFS reviewed the daily modelling data provided to the Alameda County Water District on June 12, 2017, and found that ACRP operations will diminish migration opportunities for federally-threatened Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*), especially outmigrating steelhead smolts, in some years. For instance, analysis of the daily streamflow data for May 2008 suggests ACRP operations could result in streamflows in lower Alameda Creek (as measured at the Niles Gage) dropping below the smolt passage threshold of 12 cfs for an additional 15 days when compared to the without ACRP condition.

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cont.

Based on currently available information, NMFS does not concur with the Final EIR's conclusion that ACRP operations would not substantially interfere with the movement or migration of special-status fish species, including CCC steelhead (Impact B1-11 in the DEIR and Impact B1-16 in FEIR). We recommend San Francisco Planning Commission and the San Francisco Public Utilities Commission undertake additional analysis to examine the relationship between groundwater and surface water in the Sunol Valley for the purpose of determining the project's potential impacts on a daily time-step to streamflows in Alameda Creek downstream of the project site.

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If you have any questions regarding these comments, please contact Rick Rogers at rick.rogers@noaa.gov, or 707-578-8552.

Sincerely,



Gary Stern
San Francisco Bay Branch Supervisor
North-Central Coast Office

cc: Tim Ramirez, SFPUC, San Francisco CA
Thomas Niesar, ACWD, Fremont, CA
Sean Cochran, CDFW, Santa Rosa, CA
Ryan Olah, USFWS, Sacramento, CA



BOARD OF SUPERVISORS

RICHARD VALLE
Vice President
Supervisor, District 2

August 30, 2017

Clerk of the Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

Dear San Francisco Board of Supervisors,

I am writing to you on behalf of the concerned citizens and organizations in my district about the recent approval by the San Francisco Planning Department of the Alameda Creek Recapture Project (ACRP) Environmental Impact Report (EIR). The Alameda County Flood Control and Water Conservation District (District) has been monitoring the status of the San Francisco Public Utilities Commissions ACRP during the environmental review phase and has identified potential concerns with the EIR's conclusions. The District provided substantial comments to the San Francisco Planning Department on the Draft EIR on January 30, 2017.

The District is responsible for protecting the communities of Union City, Newark, and Fremont from flooding and owns and operates the Alameda Creek Flood Control Channel from Mission Boulevard to San Francisco Bay. The District has invested a substantial amount of time and money on this channel in an effort to provide flood protection in a more environmentally sensitive manner. Through coordination with the Alameda Creek Fisheries Workgroup, the District has initiated numerous projects within the Alameda Creek Watershed to enhance fish migration to promote the recovery of threatened Central California Coast Steelhead.

Review of the environmental documentation for the project indicates that the currently proposed ACRP may undermine the District's efforts to enhance the migration opportunities for this federally protected species. Specifically, the District is concerned that the operation of the ACRP will negatively impact downstream flows and substantially interfere with the movement or migration of Central California Coast Steelhead by significantly limiting migration opportunities to enter and navigate through the Alameda Creek Flood Control Channel downstream of the proposed ACRP site.

As an elected official representing the citizens of Alameda County, my office is requesting that the San Francisco Board of Supervisors reverse the approval of the Final EIR and direct the San Francisco Planning Department and Public Utilities staff to work collaboratively with the agencies and special districts operating in the Alameda Creek Watershed to analyze and develop a recapture project that can meet the needs of all stakeholders while promoting the recovery of endangered steelhead.

Sincerely,

Richard Valle
Supervisor, Second District

1221 OAK STREET • SUITE 536 • OAKLAND, CALIFORNIA 94612 • 510 272-6692 • FAX 510 271-5115
24301 SOUTHLAND DRIVE • SUITE 101 • HAYWARD, CALIFORNIA 94545 • 510 259-1097 • FAX 510 259-0860



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

August 29, 2017

Angela Calvillo, Clerk of the Board of Supervisors
Lisa Gibson, Environmental Review Officer
City & County of San Francisco
#1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

Subject: *Comments Related to September 5, 2017 Hearing on Appeal of Certification of FEIR, Alameda Creek Recapture Project*

Dear Ms. Calvillo, Ms. Gibson and Members of the Board of Supervisors:

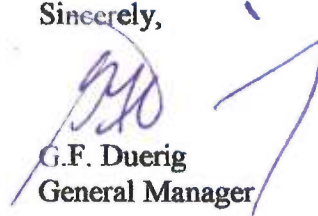
Zone 7 is submitting this letter regarding Alameda County Water District's (ACWD) appeal of the June 22, 2017 Planning Commission decision and the June 23, 2017 Public Utility Commission (SFPUC) decision to certify the Final Environmental Impact Report (FEIR) for the Alameda Creek Recapture Project and approve the project.

By way of background, Zone 7 Water Agency has been sustainably managing the Livermore Valley Groundwater Basin (DWR Basin No. 2-10) for over fifty years. As such, Zone 7 is recognized in the Sustainable Groundwater Management Act of 2014 (SGMA) as the exclusive local agency within its statutory boundary with powers to comply with SGMA. In December 2016, Zone 7 formally accepted the role of Groundwater Sustainability Agency and filed an Alternative Groundwater Sustainability Plan with the California Department of Water Resources which is still under review. On June 21, 2017, the Zone 7 Board of Directors adopted the Sustainable Groundwater Management Ordinance. Although designated a low priority basin at this time, the Sunol Valley Groundwater Basin (DWR Basin No. 2-11) falls completely within Zone 7's statutory boundary and is subject to this ordinance.

The issues raised by ACWD about inadequate analysis of potential impacts on groundwater raise significant concerns for Zone 7. Groundwater sustainability can be a precarious balance of surface water and groundwater interactions. Any change to one can easily impact the other. It could be that such a project has no impacts on the Sunol Valley Groundwater Basin but it could also be that such a project could result in reduced recharge and, eventually, a groundwater basin that is in a condition of overdraft which would also increase its priority ranking. Zone 7 would very much like to participate with other stakeholders to assure adequate analysis is performed on potential impacts of this project in order to assure that the sustainability of the groundwater basin is preserved. In fact, Zone 7 would be happy to facilitate such discussions, if SFPUC would like.

Thank you in advance for considering these comments. Please feel free to contact me if you have any questions (at the phone number above or via email at jduerig@zone7water.com).

Sincerely,



G.F. Duerig
General Manager

cc: Michael Carlin, SFPUC
Steve Ritchie, SFPUC
Betsy L. Rhodes, SFPUC
Bob Shaver, ACWD
Carol Mahoney



Daniel Waldesenbet, Ph.D., P.E., General Manager

399 Elmhurst Street • Hayward, CA 94544 • (510) 670-5480 • www.acpwa.org

August 31, 2017

Clerk of the Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

SUBJECT: SEPTEMBER 5, 2017 HEARING ON APPEAL OF CERTIFICATION OF THE FEIR FOR THE SFPUC ALAMEDA CREEK RECAPTURE PROJECT

Dear Members of the San Francisco Board of Supervisors:

The purpose of this letter is to express our support for the appeal of the certification by the San Francisco Planning Department of the Final EIR for the SFPUC's Alameda Creek Recapture Project. We are in agreement with the concerns of the National Marine Fisheries Service (NMFS), the California Department of Fish and Wildlife, the Alameda County Water District (ACWD), the Zone 7 Water Agency and the Alameda Creek Alliance that the FEIR is based on a flawed analysis of the impacts of the project on threatened Central California Coast Steelhead.

The Alameda County Flood Control and Water Conservation District (District) is responsible for protecting the communities of Union City, Newark, and Fremont from flooding and owns and operates the Alameda Creek Flood Control Channel from Mission Boulevard to San Francisco Bay. The District has been working with the ACWD for over a decade on improving fish passage within the channel to allow Steelhead to migrate to upstream spawning grounds. The District and ACWD are building a fish ladder to allow the Steelhead to pass over a flood control structure commonly known as the BART weir and ACWD's Rubber Dam No. 1. That fish ladder and other fish passage improvements to be constructed by ACWD between the fish ladder and Mission Boulevard total over \$48 million. In addition, the District has plans to reconfigure the channel from San Francisco Bay to the fish ladder in order to remove fish passage barriers and create a more sustainable low-flow fish passage channel within the channel. The cost to the District for this 9 mile long project is estimated at approximately \$53 million.

With a planned investment of nearly \$70 million for channel improvements to provide for Steelhead migration to upstream spawning grounds, the District is very concerned that the Recapture Project EIR did not adequately address the project's impacts on groundwater elevations and surface flows in Alameda Creek. Any reductions in flows below the minimum approved by the NMFS will have negative impacts on Steelhead migration in lower Alameda Creek.

Clerk of the Board of Supervisors
August 31, 2017
Page 2

With all due respect, the District requests that your Board reverse the certification of the EIR for the Alameda Creek Recapture Project, and that you direct SFPUC and Planning Department staff to work with the NMFS, CDFW, ACWD, the District and the Zone 7 Water Agency to develop a modeling methodology that uses daily flow data in a fully transparent manner.

It is our hope that by working collaboratively with all the agencies suggested, a recapture project can be developed that will meet the needs or requirements of all the stakeholders while promoting the recovery of the threatened Steelhead.

Sincerely,



Hank Ackerman, P.E.
Flood Control Program Manager

HA:mbc

C: Robert Shaver, General Manager, ACWD
Steve Ritchie, San Francisco PUC
Gary Stern, NMFS
Eric Larson, CDFW
Daniel Woldesenbet, Director, ACPWA
Jill Duerig, General Manager, Zone 7