SAN FRANCISQUITO CREEK
JOINT POWERS AUTHORITY
SFCJPA.ORG

San Francisquito Creek Flood Protection, Ecosystem Restoration and Recreation Project
Upstream of Highway 101
Notice of Preparation

Summary of Written and Verbal Comments

The San Francisquito Creek Joint Powers Authority (SFCJPA) filed a revised Notice of Preparation (NOP) to develop an Environmental Impact Report (EIR) for a capital project on the upstream portion of San Francisquito Creek in San Mateo and Santa Clara Counties on December 21, 2016. On December 23, 2016, the Army Corps of Engineers (Corps) published a Federal Register Notice of Intent to prepare an integrated Feasibility Study/ Environmental Impact Statement (FS/EIS) that is being coordinated with the SFCJPA (FR Vol. 81, No. 247 Notices, Page 94351).

The SFCJPA will prepare environmental documents required under California Environmental Quality Act (CEQA) and the Corps will prepare documents under the National Environmental Policy Act (NEPA).
The SFCJPA held four scoping meetings during the review period, as listed below:

1. January 18, 2017 at 6:30 p.m. at the Laurel School Upper Campus, 275 Elliott Drive in Menlo Park, CA. This was a joint Scoping Meeting with the Corps of Engineers.
2. January 26, 2017 at 7:00 p.m. at the East Palo Alto City Hall Community Room, 2415 University Avenue in East Palo Alto, CA.
3. January 31, 2017 at 7:00 p.m. at the Palo Alto Art Center Auditorium, 1313 Newell Road, Palo Alto, CA.
4. February 1, 2017 at 7:00 p.m. at the Menlo Park City Council Chambers 701 Laurel St, Menlo Park, CA

The SFCJPA purpose of these public meetings was to describe the project scope and to solicit public input on the following for the EIR:

- Project objectives
- Potential alternatives to be studied
- Potential environmental effects that will be analyzed

The Corps purpose of the meeting was to solicit input regarding the environmental issues of concern and the alternatives that should be discussed in the integrated FS/EIS.

Verbal comments made by those attending the four scoping meetings were recorded. Additionally, the SFCJPA and Corps received written comments. A summary of public comments is provided below, followed by a summary of comments submitted by public agencies.

All comments will be considered in developing the draft EIR and FS/EIS.

Summary of Public Comments

In addition to verbal comments recorded during the scoping meetings, forty-one written comments were received. The following is a summary of all of these comments categorized by whether the comment was related to the project's objectives, alternatives or environmental effects as described in the Notice of Preparation.

SFCJPA Objectives

The project will use an integrated watershed approach, with the following specific objectives:

- *protect property and infrastructure from floodwaters exiting the creek, while minimizing impacts to adjacent communities and the environment;*
- *enhance habitat within the Project area, particularly interconnected habitat for threatened and endangered species;*
- *create new recreational opportunities and connect to existing bike and pedestrian corridors;*
- *minimize operational and maintenance requirements; and*
- *identify alternatives that would not preclude future actions to bring cumulative flood protection up to a 100-year flow event*.

Corps Objectives

The Corps objective is limited to evaluating opportunities to reduce fluvial flooding to reduce risks to public safety due to flooding, consistent with protecting the Nation's environment, in accordance with national environmental statutes, applicable executive orders, and other Federal planning requirements. The Corps will identify a Tentatively Selected Plan that will be the least cost alternative.

Summary of Comments Related to Objectives

1. Keep the natural look of the creek. (many commenters)
2. Objectives are vague. Not clear what size the Pope-Chaucer Bridge is going to be designed for. (several commenters)
3. Project objectives are focused on private property and endangered species. Are we not concerned about jeopardy to humans and protection of humans and pets?
4. Clarify the level of flood protection provided by the project.
5. Objective for design should prevent the 1998 flood, with benchmarks to this objective.
6. The objectives seem ambiguous. Under CEQA and Clean Water Act, it is already established that we want minimal impacts, but the objective seems to be to minimize impacts. This might not be a constructive objective since it's already covered.
7. Add an objective to remove properties from the FEMA flood map and requirements to purchase flood insurance.
8. Consider an objective to complete the project in less than 35 months. A stakeholder coordination team may help meet this timeline.
9. The Project should only be designed to accommodate the 1998 flood event and not oversized to accommodate a 1% flood event.
10. A 98% (7,000 CFS) solution completed in the next couple years is preferable to a 99% (8,800 CFS) solution at an unknowable time in the future.

SFCJPA and Corps Alternatives

The five alternatives proposed to be analyzed are:

Alternative 1: No Action
Alternative 2: Modify Pope-Chaucer Bridge and widen creek channel bottlenecks
Alternative 3: Construct one or more upstream detention basins
Alternative 4: Construct an underground bypass culvert
Alternative 5: Construct floodwalls along the channel

Summary of Comments Related to Alternatives

1. Support upstream detention (Alternative 3) and removing Pope Chaucer Bridge and bottlenecks (Alternative 2). (many commenters)
2. Support an underground bypass (Alternative 4) (several commenters).
3. Consider overland floodways using local roadways, like Salt Lake City and Martinez, CA.
4. Remove Woodland bypass from the scope, it's impossible to implement and won't stop flooding at Pope-Chaucer.
5. Consider an alternative that includes a large channel under the Pope-Chaucer Bridge that could also solve traffic problems.
6. Concern was raised regarding the feasibility of upstream detention basins.
7. Consider combinations of alternative to optimize a better solution, such as one that combines Alternative 2 and Alternative 3, or Alternative 2 followed by Alternative 3 (many commenters).
8. Add an alternative to deepen or widen the channel in affected areas; develop a program for sediment management.
9. Evaluate benefits of a series of small scale water detention facilities compared to proposed large scale detention. Could include retention on individual properties. (several commenters)
10. Add bank stabilization as an alternative.
11. Consider construction of a channel bypassing Pope-Chaucer Bridge.
12. Consider removing non-native species and debris (including dead vegetation) to increase channel capacity as an alternative or in addition to the current alternatives.
13. Add alternatives to remove Pope-Chaucer Bridge and restore the habitat or replace Pope-Chaucer Bridge with a single span pedestrian/bicycle bridge and restore habitat.
14. Consider evaluating a combination of currently listed alternatives, which could reduce environmental effects. Some options do not make sense without combining them. (many commenters)
15. Consider removing the Pope Chaucer Bridge, with no replacement.
16. No action is not a good option. The creek is precarious during heavy rainstorms.
17. Constructing an underground bypass would be too intrusive and expensive.
18. For detention to work there would need to be multiple detention areas.
19. Look for habitat restoration options beyond what is required for mitigation. For example, setting back existing floodwalls along Woodland Avenue in E. Palo Alto.
20. Floodwalls downstream of Pope Chaucer Bridge can't be an alternative because it will not stop flooding at Pope-Chaucer.
21. Floodwalls could be acceptable if the visual effect is subtle (not resembling a culvert).
22. Consider incentives or requirements for low impact design / impermeable surfaces to reduce flood risk.
23. The triangle piece of land near Pope-Chaucer was used to slow traffic. Do not allow traffic in future to cut this corner.
24. Do not cut the trees, add concrete or build new floodwalls (many commenters). Concerns raised about habitat impacts, changes to community character and decreases in property values associated with tree removal and new flood walls.
25. Do not install a bridge at Pope-Chaucer that would increase traffic.
26. Alternative 3 has to provide enough capacity to hold the total stream flow from a storm that is in excess of what the creek can handle, not just the peak flow rate.
27. Alternative 4 would either have to provide bypass around or along the creek from above the Middlefield Bridge to Highway 101 to achieve 100 year (8,800 cfs) protection unless the Middlefield, Pope/Chaucer, University Avenue and Newell bridges are all replaced, as none of them have a capacity over 7,100 cfs.
28. Goal for stage 1 of the flood control work on the creek between Middlefield Bridge and Highway 101 is to increase the capacity to at least 7,000 cfs. This will require the replacement of the Newell and Pope/Chaucer bridges. The question is what should be the capacity of the replacement bridges, 7,000 cfs or 8,800 cfs?

Building the 2 bridges for 8,800 cfs would avoid having to rebuild them later if a future decision was made to increase the creek capacity to 8,800 cfs. If those two bridges were built for 8,800 cfs, the Middlefield Bridge capacity of 7,000 cfs would limit the downstream flow to that value which is within the capacity of the University Avenue Bridge. Going to a creek capacity of 8,800 cfs at some time in the future would then only require replacing the Middlefield Road and University Avenue bridges along with additional widening of the creek channel itself.

29. Consider a 1,000 cfs bypass as shown in ACOE 2003 report. This option might be better than bridge replacement with less environmental effects.
30. There is an existing study regarding Buckeye Creek that might be informative for creating a detention basin there. Arastradero Preserve (Felt Lake) is another possible site for detention.
31. Create recreational opportunities of all kinds at every possible site related to the project.
32. Why are you not planning to modify Middlefield Road Bridge?
33. Consider solutions that replenish the local aquifer to reduce dependence on water imports.
34. Consider "inverse condemnation" and build bridge as a public works project. This is for the City of Palo Alto—fixing bridge will remove this issue.
35. Early in the DEIR process, provide information comparing each alternative's footprint, cost and environmental impacts. A decision tree would be helpful.
36. Form a Citizen's Advisory Group for the design of the bridge (two commenters).
37. Need to be consistent with local general plans, particularly as related to open space and natural resource protection.
38. The project has taken too long and want action now (many commenters).
39. Need to cumulatively analyze Newell Bridge and SFCJPA projects to avoid piecemealing (several commenters).
40. Consider replacement of the Pope-Chaucer Bridge with a single arch bridge of small diameter that can convey an additional 700 cfs of water or construct a diversion channel around the bridge and under Palo Alto Ave or Woodland Ave that would convey 700 cfs of water. This would minimize impacts to heritage trees.
41. Appoint a Citizen Advisory Committee for design of a new Pope-Chaucer Bridge. Recommendations regarding the bridge design were also made.

Notice of Preparation List of Potential Environmental Effects to be analyzed

- Aesthetics
- Air Quality
- Biological Resources and Riparian Habitat
- Climate Change
- Geology and Soils Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Private Property
- Construction Noise and Vibration
- Paleontological, Archaeological & Architectural Resources
- Recreation and trails
- Traffic and Transportation
- Utilities and Public Services

Summary of Comments Related to Potential Environmental Effects to be analyzed and Environmental Analysis

1. How will climate change impacts be evaluated – what metrics?
2. What planning horizon will be evaluated?
3. Need to consider wildlife impacts related to trails and connectivity more broadly than just for threatened and endangered species. Trails are increasingly becoming commute corridors (ten feet wide with two foot shoulders), not just quiet footpaths.
4. Need to discuss maintenance impacts.

5. Consider how sea level rise will raise groundwater levels and increase flood risk.
6. Make sure there is even handed evaluation of impacts on both sides of the creek.
7. Make sure you understand the connection of the creek and groundwater wells.
8. Analyze increased erosion due to increased water velocity after the project, with consideration of potential increased sediment releases from Stanford.
9. Alternative 2 needs to be closely examined to determine plant and tree impacts.
10. Need to synchronize the EIR with Palo Alto's Newell Road Bridge replacement project and CalTrans to avoid concerns about CEQA piecemealing – especially relevant to design consideration for bottlenecks (several commenters).

Summary of Comments from Public Agencies

Written comments were received from the California Department of Fish and Wildlife, US Environmental Protection Agency (USEPA), US Department of the Interior: Juan Bautista de Anza National Historic Trail, and the San Francisco Bay Regional Water Quality Control Board. The USEPA's comments were addressed to the Corps, and some comments are only relevant to the FS/EIS document being prepared by the Corps.

Special Status Species. Comments described special status animal and plant species that should be considered in the EIR. Recommendations for species surveys were made.

Impact Analysis. Recommendations were provided regarding direct and indirect impact types that should be considered in the EIR.

Cumulative Impacts. Recommendations were provided regarding the EIR's cumulative impact analysis.

Regulatory Approvals. Comments described the state and federal regulatory approvals that will be required prior to project implementation.

Stakeholder engagement. Stakeholder engagement was encouraged, including with community members, the Corps, Stanford University and agency staff. A neutral facilitator was suggested for stakeholder meetings.

Restoration. Recommendations were made to enhance steelhead habitat.

Recreation. Recommendations were made to protect and enhance recreational opportunities.

Objectives. Concern was raised that project objectives are not clear.

Alternatives. A recommendation was made that the EIR should analyze alternatives that protect against 20, 60 and 100-year flood events, in a phased approach. Another recommendation was made to analyze a combination of the proposed alternatives.

Least environmentally damaging, practicable alternative (LEDPA) is required by the Water Board, for all waters of the State, including the creek channel from top of terrace to top of terrace and the riparian corridor. Note the federal requirement for a LEDPA analysis, under CWA section 404, is only applicable to waters of the U.S.(i.e., the channel waters up to the ordinary high water mark).

CEQA/NEPA Approach. A recommendation was made to prepare a joint EIR/EIS with the Corps rather than separate EIR and EIS documents.

Mitigation. A recommendation was made to develop alternatives that are self-mitigating to achieve no net loss of wetlands.

Bridge design. A recommendation was made that any bridges should fully span channels.

Increase Detention Options. A recommendation was made to consider use of ball fields and low-use parking lots as temporary detention basins and to route flows to golf courses and other landscaped areas during flood periods.

Sediment Transport Model. Development of a sediment transport model was requested to inform a design that will efficiently transport sediment, particularly in light of proposed increases in sediment released from Searsville Dam.

Flow Velocity. Assessment of water velocities was requested to ensure designs are conducive to fish passage and will not result in unanticipated erosion and scour.

Upper Watershed. An assessment of flood control opportunities upstream of the study area was requested.