Glendening, Susan@Waterboards

From: Glendening, Susan@Waterboards
Sent: Tuesday, July 12, 2016 4:57 PM
To: Glendening, Susan@Waterboards
Subject: FW: RWQCB comments on Temp Water Diversion Plan for San Francisquito Creek

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From: Glendening, Susan@Waterboards [mailto:susan.glendening@waterboards.ca.gov]
Sent: Monday, July 13, 2015 11:19 AM
To: Bill Springer; Kevin Murray
Cc: Hurley, Bill@Waterboards; Lichten, Keith@Waterboards
Subject: RWQCB comments on Temp Water Diversion Plan for San Francisquito Creek

Hello Bill and Kevin,

Water Board staff has reviewed the "Temporary Water Diversion Plan," dated October 14, 2014 (Plan), submitted as part of the JPA's 401 certification application. The Plan is required pursuant to Conditions 14 and 15 of the water quality certification (Certification) issued by the Water Board Executive Officer for the San Francisquito Creek Flood Improvements Project on April 7, 2015. At this time, the Plan is incomplete as it does not yet provide sufficient ground and surface water dewatering operation details. Although the Plan provides a general overview of creek flow diversion, storm drain pump station diversion, and construction site dewatering activities, it lacks the detail necessary for us to evaluate the adequacy of the dewatering activities' water quality control and species protection measures. It is our understanding that much of the missing information is being developed, and that it will be submitted to the Water Board for our review and comment as it becomes available. In addition to the general comments outlined below, we have also inserted comment bubbles in the copy of the Plan attached to this correspondence.

The following information must be provided to satisfy the requirements of the conditional certification issued for this Project:

1. Surface Water and Groundwater Management Plans in accordance with the requirements specified under Certification Condition 14.

    a. Surface Water Management Plan (Condition 14.a) -Please make clear whether the JPA will combine the municipal pump station flows with creek flows, and whether the other miscellaneous storm drain flows will be combined with the pump station flows. For example, Plan Section III.D.b states:

        Contractor shall pump water which accumulates in the pump station wet well directly to the channel downstream of the downstream cofferdam or join the pump station outflow pipe to the stream diversion pipe. In either case, discharge to the channel shall be through the flow dissipater. Pump and pipe shall be determined by Contractor based on information provided by the City of East Palo Alto.

    Please provide more details about combining the pump station flow with or keeping it separate from the creek flow. Also please elaborate on the nature of the information the JPA needs from the City of East Palo Alto or any other party to make decisions about diverting, monitoring, and discharging any flow source in the Project.

    b. Groundwater Management Plan (Condition 14 b.) - Please indicate the method for dewatering of groundwater; e.g., pumping via sump pump, wellpoints, eductors, horizontal wells, and/or other methods. Also provide the basis for groundwater management design decisions, including the anticipated depth to groundwater, flow rates, containment for water quality testing, and discharge methods.

2. Prepare a monitoring plan for the various dewatered flow sources and discharge points to ensure the discharges meet the applicable water quality and species protection requirements.

3. Include a brief description of the natural resources being protected and steps to avoid and minimize impacts to these resources. This natural resource description shall also incorporate an outline of any dewatering related requirements

specified in the biological opinion documents to be issued for the Project by the National Marine Fisheries Service and U.S. Fish and Wildlife Service, and the Streambed Alteration Agreement to be issued by the California Department of Fish and Game. Such details might include pipe sizes, pumping rates or sizes, water quality requirements (e.g., temperature and pH), to the extent they are stricter than those imposed by the Water Board, or other factors to protect certain fish or wildlife species.

4. In Plan Section II.C, the JPA has indicated that the coffer dam location will vary depending on the construction phase being implemented based on utility crossings, downstream levee construction season, upstream floodwall construction season, etc. Please clarify why the construction phase would determine the coffer dam location, and describe how the JPA will select and implement a coffer dam location based on the least impact to the creek. If a coffer dam has already been installed during one seasonal construction window, it seems likely that it would be less-impacting to have it remain in place, than move it to another location during the same construction window. The Plan's proposed coffer dam work should take that into account. In such a situation, it's likely that we would require the JPA to leave the coffer dam in place rather than moving it to another location within the same work window.

5. The JPA must incorporate findings and requirements still pending from the National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW). Such details might include pipe sizes, pumping rates or sizes, or other factors to protect certain fish or wildlife species.

6. The Plan addresses various flow sources, but more details are necessary for us to understand if the JPA intends to manage each source differently. Please consider reorganizing the document to systematically address management of each flow source mentioned in the Plan, as listed below, to explain the routing, containment, monitoring, and discharge steps for them:

   a. Creek flow to be routed around the construction site;

   b. Discharges from municipal pump stations that discharge street runoff and other storm drain flows;

   c. Construction site water, including:

      (i) Surface water runoff from rainfall and dry weather flows;

      (ii) Surface water run-on;

      (iii) Flow from any storm drains within the construction site; and

      (iv) Groundwater encountered during construction activities.

I would be happy to go over these comments with you. Please contact me if you have any questions on this matter.

Regards,
Susan

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