

## DEPARTMENT OF TRANSPORTATION

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SCL-87-0.69  
1999102056  
SCL087066

Mr. Terry Neudorf  
Santa Clara Valley Water District  
5750 Almaden Expressway  
San Jose, CA 95118

Dear Mr. Neudorf:

**Draft Environmental Impact Report (DEIR) for the Guadalupe River Project, Santa Clara Valley Water District**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed project. We have examined the above-referenced document and have the following comments:

**GENERAL COMMENTS**

Our concerns regarding the Proposed Action addressed in the DEIR are related to its interface with, and potential conflict with, a component of the State Route (SR) 87 Freeway Project. The following paragraphs provide a brief history of the extensive interface between the freeway and flood control projects, which provides the context for our comments on the subject document. The SR 87 Freeway Project, which is presently under construction, will upgrade SR 87 from a 4-lane expressway to a 6-lane freeway between Julian Street and U.S. 101. The Santa Clara Valley Water District (SCVWD), a co-sponsor of the US Army Corps of Engineers (Corps) Proposed Action, has been a full member of the SR 87 Project Development Team (PDT) since 1987. Over the past 13 years, SCVWD staff has participated in numerous SR 87 meetings/workshops, especially regarding locations where the freeway project interfaces with the Guadalupe River. Several important decisions were made between the SCVWD and Caltrans:

1. In 1989, the portion of the SR 87 project north of Interstate-880 (I-880) was redesigned - in coordination with the SCVWD - to include improvements to the east bank/levee of the Guadalupe River. The purpose of the redesign was to 1) increase the capacity of the Guadalupe River in the area so that it can convey the 100-Year flood flow, and 2) to allow for Caltrans to create high-quality riparian habitat on the east side of the low-flow channel of the River. [This is referenced on page 30 of the Approved Route 87 Final EIS/EIR, September 1993.]
2. In 1992, the SCVWD committed to leaving the SR 87 riparian mitigation areas undisturbed.

CT-1

CT-2

3. In December 1996, after numerous meetings/workshops between Caltrans and SCVWD - including several HEC II model runs by SCVWD staff - an agreed-upon plan for SR 87 mitigation plantings north of I-880 was reached. The plan accomplished two important goals: 1) the plantings would not increase the 100-Year water surface elevation in the River at I-880, and 2) the mitigation area was assumed to have zero hydraulic capacity in the HEC II runs. This latter point was important to Caltrans because of requirements from various Regulatory Agencies – US Fish and Wildlife Service (USFWS), Environmental Protection Agency (EPA), and California Department of Fish and Game (CDFG), that the mitigation plantings not be disturbed during ongoing flood control maintenance activities.

CT-3

The SR 87 Project has received all of the necessary permits from both the CDFG and the Corps. The permits are conditioned upon Caltrans implementing riparian mitigation at the agreed-upon locations along the east bank of the River north of I-880. The planned acreage of the SR 87 project mitigation is 10.95 acres.

CT-4

In the context of the above background, Caltrans' primary concern is that the Proposed Action does not conflict with the SR 87 Freeway Project, especially the agreed-upon mitigation north of I-880. Our specific concerns are:

1. The Proposed Action's shaded riverine aquatic (SRA) plantings in Reach A must not conflict with the Caltrans' SR 87 project mitigation plantings.
2. Any reduction in the hydraulic capacity of the Guadalupe River due to the Proposed Action's SRA plantings in Reach A must not be recouped through the periodic removal of plantings within the SR 87 mitigation area.

CT-5

CT-6

### **SPECIFIC COMMENTS ON THE DEIR**

- Page 4-31, in the last sentence of Section 4.4.1.2, please change the "more than 7" to "approximately 10.95".
- Page 4-59, please add SR 87 to the description of existing roadways.
- Page 4-67, the discussion of existing cultural resources omits the significant site of the former Wollen Mills Chinatown adjacent to the Guadalupe River at Taylor Street.
- Page 5-4, please include a discussion in Section 5.1 as to whether or not the proposed SRA plantings in Reach A will result in a reduction of the hydraulic capacity of the Guadalupe River. If so, will such a reduction necessitate future removal of vegetation within the SR 87 mitigation site located in that same reach? If the answer to this question is "yes", that fact should be disclosed as a significant impact in Section 5.4 and mitigation should be provided.

CT-7

CT8

CT-9

CT-10

- Page 6-5, the discussion of riparian impacts and mitigation in Section 6.2.1.2 is outdated. Current figures are as follows: Impacts to riparian habitat = 5.72 acres; Impacts within Corps' jurisdiction = 0.02 acres; Riparian mitigation to be planted = 10.95 acres. | CT-11
- The discussion in Section 6.2.1.2 should be revised to include an overview of the extensive coordination and interface between the SR 87 freeway and flood control projects. | CT-12
- Page 6-5, Section 6.2.1.3: SR 85 was completed in 1996, not 1994. | CT-13
- Page 6-35, Table 6.2-4 should be revised where it pertains to the SR 87 project. See the comment for page 6-5, above. | CT-14

Should you require further information or have any questions regarding this letter, please call Haiyan Zhang of my staff at (510) 622-1641.

Sincerely,

HARRY Y. YAHATA  
District Director

By 

JEAN C. R. FINNEY  
District Branch Chief  
IGR/CEQA

c: State Clearinghouse