

Stevens and Permanente Creek Watershed Council
Stakeholder: California Fisheries Restoration Foundation
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Comments, August 2003 WMI Santa Clara Watershed Action Plan

1.0 Abstract of Plan Statements of Note (for Reference):

1.1 Pages ES-1 and 2

The Executive Summary and map clearly include San Francisco Bay south of the Dumbarton Bridge as within the scope of the WMI.

1.2 Page 2-5

SCVWD's permanent and temporary dams, and the alteration of stream flows, can affect the survival and reproduction of fish and other aquatic life.

1.3 Page 5-3

Structured solutions have at least two major flaws.

1.4 Page 6-3, 6-4

FAHCE has studied the effects of water supply operation on coldwater fisheries and developed plans to modify reservoir releases and other water supplies and operations to maximize the availability of suitable coldwater habitat.

1.5 Page 6-4

Discharges of fresh water effluent was converting salt marsh to fresh water marsh. The SWRCB limited the San Jose/Santa Clara plant to limit dry-weather discharges to 120 mgd and to restore 300 acres of salt marsh.

1.6 Pages 7-1 through 7-11

Preserving and Enhancing Biodiversity for only land animals. Discusses land conservation for only these species.

1.7 Page 8-5

In 1995 SCVWD discontinued annual construction of four instream gravel spreader dams in Guadalupe Creek but continues to divert creek waters into adjacent percolation ponds.

1.8 Page 8-6

SCVWD's Fy'01-'03 15-Year Capital Improvement Plan includes \$40 million for restoration projects on Guadalupe, Stevens and Calabazas Creeks.

1.9 Page 8-6

SCVWDS maintains about 240 miles of streams and 29 miles of Canals in the Santa Clara Basin and Uvas and Llagas watersheds.

1.10 Page 8-7

As mitigation, SCVWD is restoring Cargill Salt Company Pond A-4 as a tidal salt marsh.

1.11 Page 8-9, 8-10

During 2001, FAHCE conducted field studies related to cold water fisheries, management, and assessment of trapping and trucking steelhead. After the CEQA process, monitoring may begin in the '04-'05 fiscal year.

1.12 Page 8-11

In 2001, SB 449 amended the SCVWD Act to allow use of SCVWD powers to enhance, protect, and restore riparian corridors, and natural resources. This creates new opportunities to integrate stream and riparian restoration into SCVWD's capital construction projects and maintenance operations.

1.13 Page 8-11

In the next 10-15 years, SCVWD will spend hundreds of millions of dollars to alter stream channels to contain floods. It will spend additional millions of dollars to mitigate the environmental consequences of those alterations.

1.14 Page 8-13

Strategic Objectives: Convene and facilitate groups of stakeholders. Sponsor and support applications to fund the stream stewardship process.

1.15 Page 9-14

Pollutant Strategic Objectives: Coordinate RWCCB's San Francisquito Sediment TDML work plan.

1.16 Page 9-14

Conduct public outreach and education on the "virtual elimination" of mercury.

2.0 Comments:

2.1 (ref 1.1 above)

Although South San Francisco Bay is within the scope of the Plan, with the exception of the section on pollution, there is insufficient attention given specifically to assessment, problems, and solutions. Many of the south bay sloughs and lagoons hold large resident striped bass and halibut that are either trapped or just simply took up living there. Little is known about South San Francisco Bay fisheries, which should be identified and addressed in the Plan.

2.2 (ref 1.2, 1.3, 1.9, 1.13 above)

There is recognition in the Plan that past channelization, rip rap, and concrete channels have created major environmental damage and caused serious damage to fisheries. It is herewith requested that mitigation be provided on all such structures that would improve fish passage during periods of low flow. In some cases, just a slot in the bottom of a flat concrete expanse might be sufficient.

2.3 (ref 1.4, 1.11 above)

Has or will FAHCE do comprehensive stream and fishery status and restoration studies on Stevens and Permanente Creeks?

2.4 (ref 1.5, 1.6, 1.10 above)

Historically, the many South San Francisco Bay streams and rivers flowed freely into the Bay and not only supported excellent runs of anadromous fish but made a significant contribution to the health of South Bay waters. Some years ago the U.S.G.S, did a survey of South Bay flushing by floating

markers in the Bay and determining how long it took for the markers to move up towards the Golden Gate Bridge. They looked at what peak flushing flows running out the Golden Gate contributed to water movement in the South Bay and found that massive water project exports had detrimental consequences. Assuming biological objectives still focus on the restoration of historical conditions, limitations on fresh water injection into the South Bay become the antithesis of Bay water quality and improved runs of anadromous fish.

Similarly, in looking at the various Salt Pond Conversion projects being planned, serious consideration must be first given to the need for providing fresh water marshes and other habitat forms. Conversions should not be arbitrarily designated as salt water marshes until such time as studies have measured and determined the requirements of both juvenile and adult fish rearing, carry-over, and migratory habitats in South San Francisco Bay.

2.5 (ref 1.7 above)

For many years SCVWD has constructed instream dams on Stevens Creek and other creeks to provide ground water percolation. We are opposed to the stream damage and siltation structures that results and suggest that the same or greater percolation can be achieved by the construction of permanent low-height and fish-laddered dams.

We also hope that all creek diversions are suitably screened to preclude extractions of any animals from their native habitats.

2.6 (ref 1.15 and 1.16 above)

Pollutants in San Francisco Bay waters have accumulated in larger fish to the point where in many instances state advisories caution against consumption. Mercury is one of the most serious compounds that can never be completely eliminated. The public needs to be better educated about the dangers.

2.7 (ref 1.8, 1.16 above)

SCVWD's support of the WMI process and of Watershed Councils is most laudable and needs to be continued. Converting long range planning through all of the bureaucracies inherent in the many layers of government is a most difficult challenge. All participants need to keep our eyes on maximizing the number of improved projects "on the ground", the real measure.

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