Beth, Margarete@Waterboards

From: Lennie Roberts <lennie@darwin.ptvy.ca.us>
Sent: Friday, August 22, 2014 9:36 AM
To: Beth, Margarete@Waterboards
Cc: Alice Kaufman; Megan Medeiros; Julie Hutcheson; Amanda Henry
Subject: Comments on SF Creek JPA 401 cert
Attachments: CGF RWQCB SFCreek JPA.pdf

Hello, Maggie,

Attached are my comments on behalf of Committee for Green Foothills on the proposed San Francisquito Creek JPA Project.

Thank you for the opportunity to comment.

Lennie Roberts, Legislative Advocate

COMMITTEE FOR
GREEN FOOTHILLS

August 22, 2014

Margarete Beth
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Section 401 Water Quality Certification for the San Francisquito Creek Flood Reduction, Ecosystem Restoration, and Recreation Project San Francisco Bay to U.S. Highway 101

Dear Ms. Beth,

Thank you for the opportunity to comment on the above-referenced project application. I am submitting these comments on behalf of Committee for Green Foothills (CGF), a regional conservation organization with a long-standing interest in the preservation of San Francisquito Creek as a natural resource.

My personal involvement in efforts to address flooding of the creek began as a member of the San Francisquito Creek Coordinated Resource Management and Planning (CRMP) Flood and Erosion Control Task Force, which in December 1997 published the Reconnaissance Investigation Report of San Francisquito Creek (http://cf.valleywater.org/media/pdf/SanFrancisquitoReconReport.pdf). I currently serve as a member of the Stanford Searsville Alternatives Study Advisory Group, which is comprised of diverse interests working collaboratively to provide recommendations to Stanford on the appropriate course of action for Searsville Dam and Reservoir.

I am limiting my comments and associated questions to the issue of sediment and the impacts of future sediment deposition on the proposed project. I believe this important issue has not been adequately addressed.

One element of the project proposes to widen and deepen the channel segment of the reach from the Bay to Highway 101 through excavation of sediment deposits to maximize conveyance of floodwaters. This reach is approximately 1.4 miles long, and has a very low gradient. Tidal action reaches all the way from the Bay to the culverts under Highway 101. Due to tidal influence, it is anticipated that suspended sediment from the Bay as well as from upstream sources will be re-deposited within the channel and adjacent marshplain and terraces that are proposed for restoration. Sediment production in the upper watershed is extremely episodic. Extreme and even high flow events will result in major sediment and debris deposition within the channel and vegetated marshplain and terrace areas. If not removed periodically, this ongoing re-deposition of sediment will potentially impact channel and overflow capacity.

Is there a plan or program for maintenance of the proposed wider, deeper channel capacity through removal of sediment? If so, which agency has responsibility for implementing this program? How will this program impact the proposed habitat and ecosystem restoration areas?

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In support of these concerns, please refer to the conclusions regarding sediment excerpted from the Reconnaissance Investigation Report:

"Sedimentation is a problem in the reach downstream of Highway 101 (Reach 1). This reach is subject to sedimentation from tidal action as well as deposition of sediment from upstream sources. When vegetation establishes in the sediments, it traps additional sediment. The loss of channel cross sectional area caused by sedimentation contributes to potential overbanking of floodwaters. Suspended silt from the Bay is carried into the channel with rising tidal flows, which extend upstream to Highway 101. As tidal inflows slow and begin to recede with the ebb flow, suspended silt settles onto the banks, while the tidal flow recedes down the low flow channel. Sediment accumulates along the sides of the channel bottom, and at bends or obstructions in the channel. Over time, benches at the approximate elevation of mean high tide, about 5 feet, are formed, with a low flow channel down the center. Vegetation that establishes on these benches secures them and protects them from erosion."

"Sediment originating from upstream sources and transported by creek flow is also deposited in the reach downstream of Highway 101, especially near the highway bridge itself. Near the Highway 101 bridge, the channel slope changes to a flatter grade, causing flows to move more slowly. Sediment transported by the faster flowing upstream water is deposited at this change of grade and further downstream, as the water slows along the lower gradient. In 1996, sediment blocked at least 1/3 of the flow area beneath the Highway 101 crossing."

The San Francisquito Creek Flood Reduction Alternatives Analysis by PWA and H.T. Harvey and Associates, July 17, 2009 (http://www.waterboards.ca.gov/sanfranciscobay/water_issues/hot_topics/SFCP/Application_Materials/alternatives%20analysis.pdf) also discusses the need for ongoing maintenance of channel and floodplain terrace and periodic removal of sediment.

The Stanford Searsville Alternatives Study Group is evaluating several potential actions regarding Searsville Dam, including removal/modification to the dam or a bypass channel to restore stream connectivity and fish passage. These options, if implemented, will result in significantly higher levels of annual sediment (currently trapped within Searsville Reservoir) being transported downstream. This increased annual sediment would increase the rate and amount of deposition in the channel and adjacent benches and terraces within the project area. While these potential impacts cannot be quantified at this time, they should be factored into the 401 certification process to the maximum degree possible.

Thank you very much for considering these comments.

Lennie Roberts

Lennie Roberts, Legislative Advocate