

December 14, 2012

Sent via electronic mail: No hardcopy to follow

California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400, Oakland, CA 94612
Attn: Ms. Margarete Beth
Email: mabeth@waterboards.ca.gov

Subject: Tentative Order for Water Quality Certification and Waste Discharge Requirements to the Santa Clara Valley Water District to Implement its Stream Maintenance Program

Dear Ms. Beth,

Thank you for the opportunity to review and comment on the Tentative Order for Water Quality Certification and Waste Discharge Requirements to the Santa Clara Valley Water District to implement its Stream Maintenance Program (Order). We appreciate your efforts to ensure that the Santa Clara Valley Water District (SCVWD) Stream Maintenance Program preserves and protects important environmental resources while also providing an efficient mechanism for SCVWD to manage flow conveyance capacity and maintain the structural and functional integrity of its facilities. The following comments are provided in support of that goal.

Comments:

1. We believe the Order should stipulate that the SMP Manual be updated and revised as appropriate to incorporate gravel management measures included in the final Upper Guadalupe River Flood Control Project Gravel Augmentation Plan. This plan is currently being completed by the US Army Corps of Engineers and SCVWD with the goal of addressing gravel shortages, improving aquatic habitats, and improving channel stability in Upper Guadalupe River Flood Control Project Reaches. It is important that gravel augmentation and management measures contained in the Gravel Augmentation Plan be incorporated into the SMP Manual to ensure that SMP activities complement rather than conflict with Gravel Augmentation Plan measures, and vice versa.
2. We recommend that the Order include provisions for re-introducing excavated gravels into specified re-introduction areas (including those identified in the final UGRFCP Gravel Augmentation Plan) that will not conflict with identified SMP activities. Best Management Practices should be developed to address processing, cleaning, testing, and other steps necessary for re-introduction of gravel excavated during maintenance activities. The goal is to encourage the reuse of native gravels in SMP area stream channels exhibiting signs of gravel deficits due to the effects of upstream water supply dams and increasingly urbanized watersheds. We recommend that Order Provisions 16-18 be revisited to identify mechanisms for encouraging the re-introduction of excavated

Ms. Margaret Beth

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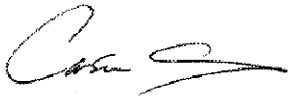
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gravels and identifying any additional provisions necessary to address the gravel re-introduction process.

3. Lastly, we request that Order Provision 64 be revised to include requirements that maintenance schedules and protocols be periodically assessed, and revised as appropriate, to ensure that vegetation clearing is conducted only where operationally necessary (e.g. to protect adequate flood conveyance capacity) and is compatible with habitat protection and other natural resource management objectives.

Thanks you for the opportunity to comment on the Tentative Order for Water Quality Certification and Waste Discharge Requirements to the Santa Clara Valley Water District to implement its Stream Maintenance Program. Please don't hesitate to contact me with any questions or to discuss this matter further.

Sincerely,



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