



Linda Adams  
Agency Secretary

# California Regional Water Quality Control Board

## San Francisco Bay Region

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Arnold Schwarzenegger  
Governor

October 6, 2010  
CIWQS Place No. 757384 (MB)

*Sent via electronic mail: No hardcopy to follow*

San Francisquito Creek Joint Powers Authority  
1231 Hoover Street  
Menlo Park, CA 94025

Attn: Mr. Kevin Murray, Project Manager  
Email: [kmurray@sfcjpa.org](mailto:kmurray@sfcjpa.org)

**SUBJECT: San Francisquito Creek Flood Reduction Project, Notice of Preparation of an Environmental Impact Report**

Dear Mr. Murray:

Water Board staff appreciates the opportunity to comment on the Notice of Preparation (NOP) of an environmental impact report for the San Francisquito Creek Flood Reduction Project.

The San Francisquito Creek Joint Powers Authority (SFCJPA) is proposing to improve flood water conveyance and flood protection, enhance wildlife habitat and recreational use, and minimize maintenance requirements along San Francisquito Creek between Highway 101 and the San Francisco Bay on the county boundary of San Mateo and Santa Clara Counties. The Project includes channel widening, setting back the existing levee, installing flood walls, creating wetlands, and restoring hydrologic connection to an existing wetland.

Water Board staff has reviewed the NOP and provides the following comments.

1. Water Board staff strongly encourages the SFCJPA to avoid and minimize impacts within the bed and bank and riparian corridor to the maximum extent practicable.
2. The EIR should include full disclosure of all impacts to water quality, existing and potential Beneficial Uses.
3. Construction is anticipated to begin in 2011. Please keep in mind a final mitigation and monitoring plan (MMP) must be reviewed and approved by the Executive Officer of the Water Board and the CEQA Notice of Determination received prior to certification. In addition, if the Project is certified under Waste Discharge Requirements (WDRs)/401 certification, then the application process may take 6-9

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months. Therefore, Water Board staff strongly encourages the SFCJPA to submit a draft application for review/comment ASAP.

4. The Project includes significant channel widening to accommodate the 1% flood event. The EIR should clearly identify the correct channel dimensions, and the process by which it was determined, such that the design channel is geomorphically stable while protecting water quality and Beneficial Uses. Supporting documentation such as appropriate testing and hydraulic/hydrologic analysis may be included with the EIR that clearly show how the channel design will achieve the Project goals.
5. Water Board staff is pleased to see the Project will create additional tidal wetlands. It is not clear in the NOP if these wetlands will be created as mitigation for Project impacts. The EIR should clearly identify the functions and values of all wetlands to be impacted and created. The EIR should discuss how the existing and proposed wetlands will be impacted by runoff from adjacent areas (i.e. runoff from the golf course) post-construction and proposed mitigation measures to protect water quality and Beneficial Uses.
6. One of the goals of the Project includes “accommodate future flood protection measures farther upstream of the project that may be constructed.” It is not clear what is meant by this goal, therefore, further clarification should be included in the EIR. That is, how will the Project “accommodate” future projects?

If you have any questions, please me at (510) 622-2338 or via email at [mabeth@waterboards.ca.gov](mailto:mabeth@waterboards.ca.gov).

Sincerely,

Margarete Beth  
Environmental Specialist

Cc: Bill Springer, SCVWD, [bspringer@valleywater.org](mailto:bspringer@valleywater.org)  
Kristen O’Kane, SCVWD, [kokane@valleywater.org](mailto:kokane@valleywater.org)