



Guadalupe-Coyote Resource Conservation District (GCRCD)

An independent special district of the State of California

April 28, 2021

Via electronic mail

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Re: WY 2020 Draft Mitigation and Monitoring Report

Dear Ms. Diggory:

The Guadalupe-Coyote Resource Conservation District (GCRCD) provides these comments on the Water Year (WY) 2020 draft Mitigation and Monitoring Report (MMR) in response to your email to the Adaptive Manage Team (AMT) dated March 30, 2021. These comments were prepared with assistance from GCRCD's outside consultant, McBain and Associates. As in years past, we thank the Santa Clara Valley Water District (Valley Water) staff and consultants for their hard work in gathering the monitoring data and preparing the draft MMR.

For ease of reference, we organize these comments according to the headings provided in the draft MMR.

ES Executive Summary

At the outset, we note that most of GCRCD's comments regarding the Executive Summary are also applicable to the more in-depth discussion in subsequent sections of the body of the report. In other words, we avoided redundant comments between the Executive Summary and body of the report. Accordingly, Valley Water's responses to these Executive Summary comments should also be provided in appropriate sections in the body of the report.

ES.3 Monitoring Method Changes

We recognize that working near encampments poses a threat to safety that was not contemplated when the Mitigation and Monitoring Plan was developed, and that the AMT may need to consider alternative measures and monitoring methods to address this challenge.

We are concerned that Valley Water's inability to sample some locations due to safety concerns this year (and in other recent years) is affecting results and our understanding of short- and long-term trends in meeting the relevant Measurable Objectives (MO). Based on our review, the draft MMR does not provide adequate information for the AMT to determine that partial sampling is not affecting overall results. Rather, except for

discussion about shrub cover, it appears the draft MMR does not include meaningful discussion of the combination of partial sampling and human impacts on overall results.

We request that Valley Water present specific information at or before the annual meeting and in the final MMR on (1) the effects of partial sampling on reported results for this year, (2) the effects of several years of partial sampling on the reliability of reported results in the long-term, and (3) whether there are likely human impacts on other Measurable Objectives MO beyond shrubs.

Next, although we appreciate and support the need to consider alternative methods for vegetation monitoring due to safety concerns and scale of the monitoring spatial extent, we also note there are tradeoffs between field and remote-sensing based approaches. The methods and results of Valley Water's LiDAR pilot study appendix should be a core component for the AMT's review of the WY 2020 MMR rather than solely a presentation at the annual meeting and an appendix to the final MMR. We request that Valley Water provide the draft appendix describing the methods and results of the pilot project to the AMT for review and comment prior to the meeting, and address any comments received in the appendix to the final MMR.

ES 4 Monitoring Results: Riparian Vegetation-Native Vegetation Cover

We recognize the challenge of meeting the long-term shrub cover MO given the prevalence of encampments and other human impacts and, potentially, the growing canopy (shading). However, the draft MMR does not discuss remedial actions for this MO likely not being met. For example, it is not clear from the draft MMR the extent to which Valley Water has evaluated potential actions like replanting, exclusionary fencing, off-site mitigation, increased encampment patrols, and/or participation in multilateral efforts to provide services for the unhoused population within the County. We request the AMT discuss strategies to address the challenge of meeting the long-term shrub cover MO at the meeting.

ES 4 Riparian Vegetation-Qualitative Assessment, second paragraph

We request that Valley Water revise the draft MMR to include definitions for the terms "established" and "recruitment" in Section 1.2.2.1, and include explanation in the MMR whether or not recruitment is being used synonymously with observance of seedlings in the Executive Summary and other sections in the document. The definition and use of these terms are relevant because "seedling recruitment" does not necessarily equal "vegetation established".

Section 1.2.1 Project Construction Status

The draft MMR states the USACE recently started its Upper Guadalupe General Reevaluation Study. We request a status report on that process be provided to the AMT at the annual meeting. This information does not appear to be included in Appendix D.

Section 1.5 Other Guadalupe River Efforts

We understand Valley Water intends to address the Guadalupe River through its One Water Program this year. We recommend including a description of this effort in Section 1.5.

Section 1.5.1 SMP and Other Maintenance Activities

We interpret Appendix C, "Downtown Guadalupe River Flood Control Project 2019-2020 Annual Inspection Report," Table 1 to be a description of proposed maintenance activities that Valley Water will implement under its SMP during the upcoming year. If that interpretation is correct, we recommend Section 1.5.1 include a specific cross-reference to Appendix C.

Table 3-4 Flood Frequency Intervals for the Guadalupe River at HWY 101

The footnote indicates a review of flood frequency data is in progress and subject to revision. Please elaborate in an appropriate place in Section 3.1. For example, is Valley Water reviewing the entirety of the flood frequency distribution, or is only 2020 data being reviewed?

Section 3.2.2.1: Health and Vigor-Summary of Methods

The second sentence appears to be referencing the wrong table and should be corrected or clarified. We also recommend that Valley Water include explanation for the averaging of individual ratings for foliage, wood, and root crown averaging results in average ratings not being whole numbers. It would be helpful to provide a simple example of a hypothetical calculation.

Section 3.2.4.2: Native Vegetative Cover-WU 2020 Results

The second paragraph is somewhat confusing, as only 3 of 10 transects were surveyed, yet observations of reduced shrub cover are recorded for 2020 unmonitored transects. Are these “qualitative observations”? Please elaborate and clarify results.

Section 3.2.8.2: Qualitative Assessment-Findings

The last paragraph indicates California buckeye was alive and healthy, but earlier text says the four planted individuals in Reach 12 did not survive the 2019-2020 season. Please clarify.

Section 3.8.1: WY 2020 Anadromous Fish Passage: Depth, Velocity, and Vertical Barrier Indicators

As recommended in our comments on the WY 2019 MMR, we request the draft MMR include a description of what happened to sediment removed from the Reach 3B site on May 8, 2020. Was it hauled off site and disposed in a landfill at some point later in the year, or was it sidecast where subsequent high flows could wash the material back into the channel? Understanding the final disposition of that material (volumes, dates of removal, where it was spoiled) will help inform future improved management of sediment, including potential re-use of clean gravel in the Guadalupe River.

Chapter 4: Recommendations

It is not clear why the draft MMR does not include recommendations based on the results of the WY 2020 MMR. As a primary example, the fish passage MO continues to not be met at Weir #1, Remedial Actions are identified in Table ES-1, and the MMR mentions “hydrologic analysis to better understand the frequency and duration of unsuitable passage conditions is being planned, as well as development of potential options for improving passage conditions at this location”. This fish passage issue has been ongoing for years. It is time for a recommendation that will lead to attainment of the MO (per Remedial Action in Table ES-1), one that is focused on remediation rather than additional years of analysis.

A second substantial recommendation that should be addressed is related to the challenges with meeting the shrub cover MO given the human disturbance. For example, if the forecasted trajectory does not change, what is the remedy and where does the responsibility for implementing the remedy lie? A draft recommendation in the report for discussion at the annual meeting would help us develop a remedial strategy to the underlying causes of low shrub cover area. It appears that Valley Water has initiated some actions (e.g., the pilot program in the Guadalupe River Park area), which could serve as a starting point for developing the recommendation.

Conclusion

Thank you for considering these comments and recommendations. We reiterate our request that Valley Water provide the AMT with the draft LiDAR pilot study appendix prior to the annual AMT meeting so we can prepare for the discussion, and accordingly look forward to the discussion at the annual AMT meeting. Please contact us if you have questions regarding these comments or recommendations in advance of the meeting.

Sincerely,

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