



## San Francisco Bay Regional Water Quality Control Board

March 30, 2015

Ms. Jean McCown  
Steering Committee Co-Chair - Searsville Dam Alternatives  
Government and Community Relations  
Stanford University  
450 Serra Mall, Building 170, First Floor  
Stanford, CA 94305-2040

Dear Ms. McCown:

The San Francisco Bay Water Board greatly appreciates the initiative by Stanford University to sponsor the Searsville Dam Advisory Group to consider alternative management strategies for the Searsville reservoir. The Water Board intends to remain engaged in this issue by participating in a coordinated review of project alternatives with other responsible federal and State resource agencies as project planning enters into the regulatory process, including preparation of federal and State permits and development of an environmental impact report under the California Environmental Quality Act (CEQA).

The Water Board has broad regulatory authority, as described in the San Francisco Bay Basin Water Quality Control Plan (Basin Plan), relating to the protection and restoration of water quality and the beneficial uses of San Francisquito Creek, including cold freshwater habitat, spawning, fish migration, and rare and endangered species habitat. As stated in the Basin Plan, "Protecting beneficial uses within the Region consistent with the federal Clean Water Act and the Porter-Cologne Act requires careful consideration of projects that result in hydrogeomorphic changes and related adverse impacts to the water quality and beneficial uses of waters of the State." In our role as a responsible agency under CEQA and our role as the State's water quality permitting agency, we will want to be able to review an assessment of the management alternatives, and their influence on natural physical processes and related water quality and habitat conditions, to determine the environmentally-superior alternative.

In addition, San Francisquito Creek and its tributaries are federally-listed as impaired by sedimentation. The mainstem of San Francisquito Creek downstream of Searsville Dam is a deeply incised channel, its habitat is greatly simplified, and the channel is largely decoupled from its floodplain and tidal marsh. The dam contributes to these impairments by creating an imbalance in coarse and fine sediment supply to the downstream reach and also by causing the processes of sediment transport and deposition to be substantially altered. Up until recent decades, Searsville Lake was a complete trap for all of the coarse sediment (gravel and sand) and much of the fine sediment delivered from upstream areas. The dam also remains a complete barrier to steelhead migration, greatly reducing the amount of habitat that is accessible, and placing this steelhead population at much greater risk of extinction.

To address the impairment, the federal Clean Water Act mandates that a “Total Maximum Daily Load” be developed by the Water Board to ensure that San Francisquito Creek is restored and the sediment impairment is removed. We expect that the TMDL and its associated implementation plan for San Francisquito Creek will need to take a holistic approach to implementation, one that emphasizes achieving balanced coarse and fine sediment supplies throughout the watershed, and includes actions to enhance habitat complexity and connectivity in upstream and downstream channel reaches. Consistent with these goals, we support alternatives for the management of Searsville Dam that would restore natural sediment supply and transport to downstream channel reaches, floodplains, and tidal marshes, while also restoring anadromous fish migration to and from the upper watershed. Staff representing the Water Board on the Searsville Dam Advisory Group has emphasized the benefits of sediment continuity between upstream and downstream reaches, natural transport and deposition processes, and the importance of restoring anadromous fish migration. Marsh and floodplains downstream of Highway 101, including the Faber Marsh, ultimately will benefit in the long-term from restored fine and coarse sediment supply and transport, particularly given the need for our Bay marshes to be nourished by sediment in order to be resilient to sea-level rise.

We would like to provide some initial input to the Searsville Dam Advisory Group and Stanford University about our perspective on these matters as alternatives are being considered. We have been, and continue to be, supportive of alternatives that focus on dam removal. We are supportive of giving consideration to sluicing sediment from the dam in lieu of, or in connection with, sediment excavation from the reservoir. On the other hand, we think there will be performance issues associated with the application of fish ladders and operations of orifices in dams to mitigate for fish passage barriers and are concerned about the technical feasibility of constructing bypass channels around the dam.

We look forward to working with you in the future on this important project and would welcome you to come to the Water Board to provide a detailed briefing on the management alternatives under consideration. Please contact my staff, Ann L. Riley at [AL.Riley@waterboards.ca.gov](mailto:AL.Riley@waterboards.ca.gov), if you have any questions.

Sincerely,

Bruce H. Wolfe  
Executive Officer

cc: Gary Stern, NOAA Fisheries: [Gary.Stern@NOAA.gov](mailto:Gary.Stern@NOAA.gov)  
Scott Wilson, Bay Delta Region, California Department of Fish and Wildlife:  
[Scott.Wilson@wildlife.ca.gov](mailto:Scott.Wilson@wildlife.ca.gov)  
Kelsy Rugani, Facilitation Team, Searsville Dam Advisory Group: [Krugani@kearnwest.com](mailto:Krugani@kearnwest.com)