

Michele King

From: Jack Lucas <jlucas1099@aol.com>
Sent: Thursday, August 03, 2023 8:02 AM
To: Board of Directors
Subject: Fw: Valley Water Board Meeting = August 8, 2023 Item 3.4 File #23-0792 FAHCE Program EIR

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Valley Water Board,

This is to request that Clerk of Board please correct the double negative in my third paragraph...

Alamitos Creek is feasible habitat for neither steelhead or chinook salmon

As postscript would propose appealing alternative for restoration of Chinook Salmon to Los Gatos Creek by reconstituting Camden percolation ponds off line and recovering historical natural creek channel. Los Gatos Creek has exhibited at times extraordinary percolation of volumes of storm flows to drinking water aquifers so this should enhance its function while natural channel doubles or triples salmon habitat area.

I thank the Board for its careful consideration for this long standing FAHCE effort. Restoration of natural stream systems and sustainable riparian corridors in our Santa Clara County watersheds is the best possible protection against the extreme weather events of global warming.

Libby Lucas

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From: Jack Lucas <jlucas1099@aol.com>
To: board@valleywater.org <board@valleywater.org>
Sent: Wednesday, August 2, 2023 at 03:30:36 PM PDT
Subject: Valley Water Board Meeting = August 8, 2023 Item 3.4 File #23-0792 FAHCE Program EIR

Valley Water Board of Directors
Valley Water, Almaden Road, San Jose, CA

August 2, 2023

Dear Valley Water Board Members,
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In regards Item 3.4 on your August 8 Agenda, the FAHCE Program EIR, I strongly recommend that you obtain a scientific second opinion on the viability of anadromous fishery recovery in the stream systems identified in this Program EIR.

Believe I submitted in previous comments on FAHCE the fishery evaluation California Department of Fish & Game gave on Upper Coyote, Alamitos and Guadalupe Creeks in regards stream temperatures that would be prohibitive for sustainable runs of steelhead and Chinook Salmon. Upper Coyote Creek and Guadalupe Creek were marginal depending on volume and temperatures of release base flows and air temperatures, (this would be for steelhead, not Chinook Salmon), but with improved fish ladder access.

Alamitos Creek was judged to be infeasible habitat for neither steelhead or salmon due to temperatures.

The fish ladder for Coyote Creek lake just south of #85 crossover from #101 above Tennant marsh was impassable under most flow conditions. Upstream in Coyote Valley high percolation gravels challenged sustainable base flow sustainability and temperatures.

Guadalupe Creek migratory steelhead access was equally challenged by Blossom Hill dam fish ladder. The Dave Rosgen hydrology workshop had class project drop structure fish ladder design assignment, a class which had SCVWD staff members, but do not believe recommendations were formally accepted. This review was in 1995 so am uncertain what has been engineered since.

Guadalupe Creek dam was also modified, but access by Alamitos Creek resident brown trout, lethal to steelhead fries, still compromise Guadalupe Creek viability for anadromous fishery. Extensive channel acreage of high percolation gravels north of Blossom Hill in main stem Guadalupe River reduces base flows of river throughout most of year to limit feasibility of successful migratory fish sustainable habitat.

Pre upstream reservoirs wet winter flows were historically able to support both steelhead and chinook salmon in the South Bay, but present conditions removed pulse flows needed for such an anadromous fishery. Do not believe what the District is proposing is capable of reproducing this watershed success.

Where chinook salmon were able to find sustainable stream temperatures and spawning gravels for establishing redds was in mainstem Guadalupe River at St. John Street as reported by United States Department of Fish and Wildlife in their HEP analysis of October 1993, for U.S. Army Corps of Engineers for the Guadalupe River Flood Control Project. This report noted 262 redds were in Guadalupe River project area in 1986, a favorable wet year, and Guadalupe River had rich canopy of riparian vegetation.

However, it is essential that the District reviews USGS data on stream temperatures and flows for that time in Guadalupe River to see what optimum conditions were necessary to support an anadromous run.

I can provide such data in detail but believe your staff should have used it as baseline for its FAHCE EIR project plan. I can't believe stream temperatures that District has recorded for Alamitos, Guadalupe and Los Gatos Creeks where chinook salmon recovery efforts are designated can possibly comply with Fish & Game criteria for parameters for salmon survival. 16.0 degrees centigrade used to be considered tops.

Another consideration is upwelling in downtown mainstem Guadalupe River from upstream percolation, and the deep pool at confluence of Los Gatos Creek and Guadalupe River (for holding in peak summer heat) that contributed to optimum survival conditions. In past centuries California's Indian populations knew how to foster fish survival throughout dry and wet seasons but their legacy has been lost to our modern methods of supply and demand.

In closing, submit that this FAHCE EIR Project plan hasn't a chance of succeeding in locations proposed and that it needs additional engineering remedies to remove obstructions still present in river systems.

For 25 years in the making this is not the viable FAHCE resolution anticipated.

Do let me know if USGS gage data would be helpful in regards stream temperatures for 1985 to 1991.

Libby Lucas
174 Yerba Santa Ave., Los Altos

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