



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

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Sent via email: commentletters@waterboards.ca.gov

July 28, 2011

Jan O'Hara
California Regional Water Quality Control Board, SF Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612



Subject: Comment Letter - SF Bay Region Beneficial Uses/Waterbodies Update

Dear Ms. O'Hara,

Thank you for the opportunity to comment on the amendment to add unnamed surface water bodies and designated beneficial uses for the San Francisco Bay Region. Zone 7 Water Agency reviewed the amendment and the comments are made in the context of Zone 7's mission to provide drinking water, non-potable water for agriculture/ irrigated turf, flood protection, and groundwater and stream management within the Livermore-Amador Valley.

In 2009, Zone 7 provided detailed comments on the proposed beneficial use designations for water bodies in its service area during the triennial review of the Basin Plan. These comments are now noted in the Beneficial Use Documentation Table. Zone 7 also submitted comments in May 2010, which did not result in changes to the beneficial use designations.

We would like to bring to your attention new information for consideration and briefly reiterate some of our comments from our 2009 and May 2010 letters, as this information was not adequately addressed in the final Plan Update. The Regional Board may be making overly broad assumptions about these waterbodies without proper investigation.

Our comments are as follows:

1. For water bodies to which COLD has been changed from (P) to (E): COLD may not be suitable for some water bodies in this area due to high water temperature (coming from the South Bay Aqueduct) and water quality issues (due in part to naturally occurring alkali salts). Consider conducting field verification of suitable habitat and water temperature/quality analysis.
2. For water bodies to which WARM has been proposed: WARM may not be suitable for some water bodies in this area due to high water temperature and water quality issues (due in part to naturally occurring alkali salts). Consider conducting field verification of suitable habitat and water temperature/quality analysis.
3. For water bodies to which RARE or WILD has been newly identified as a beneficial use: Please note that while our opinion that RARE or WILD may be a satisfactory beneficial use designation, as noted in our 2009 letter for certain areas, these designations are not based on or supported by biological studies.

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New Information:

Zone 7 is currently undertaking several studies that aim to better understand our streams with respect to temperature and water quality. We are installing temperature probes in several of our key streams to monitor temperature over the next few years in order to better understand seasonal and daily fluctuations. Likewise, Zone 7 initiated a sediment study in conjunction with the San Francisco Estuary Institute in 2010. Zone 7 plans to continue that monitoring for at least three years to establish the grain size and amount of sediment being transported by the system, which can greatly impact water quality and temperature.

Additionally, Zone 7 will be facilitating a new project that intends, in part, to investigate the potential for lowering baseline surface water temperatures in Arroyo Mocho. We will be installing a vegetative canopy along a 4,200 linear foot reach of a trapezoidal section of the arroyo that today is nearly devoid of canopy. We plan to install a mix of tree canopy and underlying shrubs suitable for the hot, gravelly conditions in the Livermore Valley. This site will be monitored for temperature as well as other key indicators for habitat success. Once the canopy begins to establish and we have collected surface water temperature data for a period of time that allows for enough statistical comparison, we would like to share the findings with the Regional Board. Our hope is that the Regional Board will consider this data in the assignment of beneficial use designations to the arroyos in this region and adjust designations, as necessary.

If you have any questions or comments, please feel free to contact me at (925) 454-5064, or Elke Rank at (925) 454-5005.

Sincerely,



Carol Mahoney
Integrated Planning Manager

cc: Jill Duerig, Zone 7
Joe Seto, Zone 7
Elke Rank, Zone 7