

**Santa Clara Valley  
Water Resources Protection Collaborative**

## **Matrix of Water Resources Protection Problems**

**Draft for Collaborative Review**

**22 September 2003**

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## Notes

This matrix was prepared at the request of the Santa Clara Valley Water Resources Protection Collaborative Guidelines and Standards Work Team. See the “Key Outcomes Memorandum” of the September 3, 2003 meeting.

The matrix assisted the Work Team to review and evaluate the problems identified by the District, to identify gaps and desired outcomes, and to select the best candidates for inclusion in (1) a definition of surface and groundwater quality and quantity and (2) an outline for guidelines and standards for land use near streams.

### **Column 1. Problem (identified by District).**

Lists of 12 “Key Problems in Water Resources Protection” and 32 additional “Other Problems in Water Resources Protection” were prepared by District staff and were discussed in Collaborative meetings in early 2003. These lists (totaling 44 problems) have been combined. One additional problem (#45) was identified during discussions with District staff following the September 3 meeting. Titles were added to Problems 13 – 44, and some of the text has been edited for clarity.

### **Column 2. WMI Watershed Action Plan**

The Santa Clara Basin Watershed Management Initiative’s (SCBWMI’s) *Watershed Action Plan* was approved by the SCBWMI Core Group in August 2003. This column shows excerpts and paraphrases from the Watershed Action Plan. Locations of the quotes are noted by chapter or section, rather than by page number, because the document is still in press. The *Watershed Action Plan* can be accessed on-line at [www.scbwmi.org](http://www.scbwmi.org).

### **Column 3. SCVURPPP and City/Town/County Policies, Guidelines & Standards**

The District, the County, and the 13 cities and towns in the watersheds that drain to San Francisco Bay are co-permittees under a stormwater NPDES permit issued by the San Francisco Bay Regional Water Quality Control Board. The co-permittees pursue joint compliance activities through the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP). Entries in this column refer to SCVURPPP’s Urban Runoff

Management Plan, to the individual urban runoff management plans prepared by each of the co-permittees, to the Performance Standards adopted by SCVURPPP and approved by the Regional Board, or to guidelines that are currently being prepared by co-permittee staff workgroups. SCVURPPP documents are available at [www.scvurppp.org](http://www.scvurppp.org).

Other entries in Column 3 include examples, quotes, and excerpts from General Plans, ordinances, guidelines, and other documents adopted by Santa Clara County or the cities and towns within the County. Some entries characterize typical practices rather than formally adopted guidelines.

### **Column 4. District Policies, Guidelines, and Standards**

These entries cite District plans and reports or characterize District practices.

### **Column 5. Other Policies, Guidelines & Standards.**

Entries in this column reference the most significant guidelines and standards that influence the way the problem is addressed by local agencies and/or that might be referenced or incorporated in the Collaborative’s guidelines and standards. Some entries reference Federal and California laws, regulations and policies; others note widely followed technical guidelines produced by non-governmental organizations.

### **Column 6. Noted Gaps and Obstacles**

Entries in this column elucidate the problem from a policy perspective and suggest why current laws, regulations, policies, practices, guidelines, and standards may be insufficient.

### **Column 7. Possible Outcomes of Collaborative.**

This column includes ideas and suggestions that may facilitate Work Team discussion.

## List of Problems

1. Bed and bank erosion
2. Development in floodplain
3. Trash
4. Channelization
5. Hardening of channels
6. Stormwater runoff pollution
7. Sediment
8. Placement of trails within the riparian corridor
9. Infiltration of contaminated storm water
10. Septic systems
11. Urbanization impacts on threatened species
12. Problems for creekside property owners
13. Grading
14. Sediment
15. Pump discharges
16. Private maintenance
17. Detention basins
18. Imperviousness
19. Encroachment
20. Invasive plants
21. Human/pet presence
22. Homelessness
23. Homelessness
24. Damage to vegetation
25. Peak flows
26. Trash
27. Feral animals
28. Vandalism
29. Trails/maintenance conflict
30. Trails/flood protection conflict
31. Irrigation runoff
32. Storm water infiltration devices
33. Groundwater pollution
34. Groundwater extractions
35. Groundwater extractions
36. Groundwater extractions
37. Abandoned wells
38. Artesian wells
39. Erosion from outfalls
40. Livestock
41. Non-point pollution
42. Rural roads
43. Water conservation
44. Loss of recharge
45. Nutrients and pesticides in groundwater

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>1. Bed &amp; Bank Erosion</b></p> <p>Higher frequency stream flows (1 to 10 year storms) increase due to increased watershed imperviousness and drainage efficiency.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Thompson Creek post-development storm flows are substantially greater than pre-development.</li> <li>• Stream gauge data shows larger flows occurring more frequently. Sediment sampling shows extensive erosion d/s of urban outfalls (i.e., not from undeveloped areas).</li> <li>• Upper Penitencia and Berryessa Watersheds show similar effects.</li> </ul>	<p>Chapter Four</p> <p>“The WMI advocates site development designs and drainage designs that detain or retain runoff where needed to protect streams from flash runoff, erosion, and pollutants. Cities, towns, and the County should revise their standards....”</p> <p>“Work with SCVURPPP to facilitate implementation of the C.3 provisions....”</p> <p>“Coordinate and integrate implementation of the guidance manual and other outcomes of ... [the HMP].”</p> <p>“Develop indicators of progress.”</p>	<ul style="list-style-type: none"> <li>• Cities refer applicants to BASMAA’s <i>Start at the Source</i> (1999) site design techniques.</li> <li>• Planning Procedures Performance Standard &amp; Provision C.3 b. requirements for site design.</li> <li>• SCVURPPP <i>Development Policies Comparison Project</i> evaluated current City policies that affect imperviousness and drainage. Cities are revising policies per Provision C.3.j.</li> <li>• Hydromodification Management Plan (HMP, due 1/04) to evaluate on-site and off-site development BMPs, drainage-area facilities, and in-stream BMPs and recommend solutions in a Guidance Manual.</li> </ul>	<p>District staff is managing preparation of the HMP.</p> <p>District implements some in-stream BMPs through Stream Maintenance Program.</p> <p>District reviews projects within 50 feet of top of bank.</p>	<p>RWQCB Stream Protection Policy. Recent RWQCB <i>Primer on Stream and River Protection...</i> emphasizes in-stream BMPs.</p>	<p>Drainage master plans may be a key unaddressed link between site designs and the HMP.</p> <p>HMP won’t apply in Uvas/Llagas Watershed.</p> <p>HMP watershed measures address only large, future projects.</p> <p>Need to address rills, gullies, &amp; headcuts in streambanks caused by development and poorly designed drainage.</p>	<ul style="list-style-type: none"> <li>• Evaluate/ endorse SCVURPPP <i>Planning Procedures Performance Standard</i>.</li> <li>• Evaluate or endorse HMP Guidance Manual</li> <li>• Develop/improve design standards for outfalls &amp; drainage near streams.</li> <li>• Collaborate with WMI on developing and using progress indicators.</li> <li>• Address existing development, smaller parcels, and Uvas/Llagas Watershed.</li> </ul> <p><b>Collaborative Goals: Flood Protection, Surface Water Quality, and Habitat.</b></p> <p>Also see Problems 11, 18, 25, and 39.</p>

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<p><b>2. Development in Floodplain</b></p> <p>Floodplain development encroaches on floodway and causing larger area to flood. Structures built at top of bank (also, built within District rights of way)</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Structure built by private property owner encroaches in floodplain adjacent to Adobe Reach 5.</li> <li>• 17<sup>th</sup> St on Coyote Creek</li> <li>• Proposed hotel in Campbell on Los Gatos Creek; buildings in Saratoga on San Tomas Aquino Creek, in Los Gatos on Almendra Creek, in San Jose on Canoas Creek.</li> </ul>	<p>Chapter Five</p> <p>“... provide a forum and develop a process for integrated planning of floodplains and riparian corridors.... Provide a neutral place where potentially contentious floodplain management issues... can be referred.”</p> <p>“Coordinate and integrate floodplain and riparian corridor planning with... stream stewardship planning, habitat conservation planning, and General Plans.”</p> <p>“Develop indicators of implementation.”</p>	<ul style="list-style-type: none"> <li>• CEQA reviews assess if structures are within “100-year hazard area” (Checklist VIII.h)</li> <li>• Some, but not all, municipalities have floodplain management ordinances.</li> </ul> <p><i>Examples:</i></p> <p>San Jose</p> <p>“...until a floodway is designated, no new ... development, including fill, shall be permitted within a special flood hazards area ... unless ...the cumulative effect of the proposed development... will not increase the water surface elevation of the base flood more than 1 foot...”</p> <p>Cupertino</p> <p>[prohibit] habitable development in natural flood plains [including] obstructions ... [or modifications to] natural streambanks.</p> <ul style="list-style-type: none"> <li>• Most municipalities have riparian setback requirements.</li> </ul>	<p>In an unusual partnership, the District’s floodplain management activities are credited to Cities as participation in FEMA’s Community Rating System (CRS). The CRS provides 5–45% discounts in flood insurance premiums to municipalities that adopt floodplain management policies.</p> <p>District distributes guidelines for subdivision design adjacent to creeks.</p> <p>District reviews and permits projects constructed within 50 feet of top of bank.</p>		<p>Cities’ floodplain management ordinances vary in stringency and level of detail.</p> <p>Development review is reactive, but pro-active, long-term planning is needed for management and/or restoration of floodplains.</p> <p>There are relatively few designated floodways in the County. Proposed structures may be outside mapped flood hazard area but still impede District’s ability to manage floodplain. Without a designated “plan line” cities may not be able to deny permits to build.</p>	<ul style="list-style-type: none"> <li>• Supplement guidance for CEQA review.</li> <li>• Enhance CRS program.</li> <li>• Establish/expand criteria that trigger District review and permitting.</li> <li>• Develop an integrated planning process to pro-actively plan development and restoration of specific streamside areas (WMI approach).</li> <li>• Develop progress indicators.</li> </ul> <p><b>Collaborative Goals:</b> <b>Flood Protection, Surface Water Quality, and Habitat.</b></p> <p>Also see Problem 19.</p>

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<p><b>3. Trash</b></p> <p>Trash enters District managed stream reaches through storm drains, from upstream reaches, from public access areas, and from homeless encampments.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Rags, shopping carts and litter are visible throughout Downtown San Jose, particularly after storm events.</li> <li>• Frequent residents' requests to the District to clean trash from Alamos Creek Trail</li> </ul>	<p>Chapter Nine</p> <p>"Remove trash and larger debris from streams and wetlands and find ways to limit what gets dumped there."</p>	<p>SCVURPPP's 2-year trash workplan aims to:</p> <ul style="list-style-type: none"> <li>• Document and evaluate existing trash management practices.</li> <li>• Develop a strategy to conduct trash evaluations.</li> <li>• Assist municipalities to identify high priority trash problem areas and sources.</li> <li>• Provide guidance on the implementation of potential control measures</li> <li>• Develop a standardized reporting format.</li> </ul> <p>SCVURPPP also conducts studies of methods for straining trash from stormwater.</p> <p>Cities promote creek clean-ups (e.g. Gilroy on 9/20/03).</p>	<p>District maintenance crews remove trash from creeks and wetlands.</p> <p>District's Adopt-a-Creek and Creek Connection Action Group programs promote citizen participation in clean-ups and litter prevention.</p>	<p>In 2002, RWQCB considered listing urban creeks as impaired by trash, but found there was no consistent methodology for defining impairment. RWQCB will consider results of actions by NPS programs during next listing cycle.</p>	<p>It's difficult to measure trash, to assess its impact on habitat or other beneficial uses, or to predict and control sources.</p>	<ul style="list-style-type: none"> <li>• Endorse and/or monitor execution of SCVURPPP trash workplan.</li> <li>• Endorse municipal creek clean-ups and litter prevention.</li> <li>• Encourage/expand current cooperative clean-up and litter prevention efforts.</li> <li>• Evaluate potential of trash racks and stilling basins at creek outfalls.</li> <li>• Facilitate City/ District/ County 1-stop permitting for Adopt-a-Creek cleanup projects.</li> </ul> <p><b>Collaborative Goals: Surface Water Quality and Habitat.</b></p> <p>See also Problems 21, 22, 23, 26, 27, 28.</p>

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<p><b>4. Channelization</b> Increased channelization (realignment, not necessarily hardening) of streams decreases habitat <i>Example:</i></p> <ul style="list-style-type: none"> <li>Lower Silver Creek is now an earthen channel and has poor habitat value, but steelhead still attempt to use it as habitat.</li> </ul>	<p>Chapter Eight [a] ... planning process for ecosystem renewal should be integrated with flood control planning to maximize both objectives and to allocate and prioritize the available budget.... Incorporate floodplain management.”</p>	<p>General Plan policies encourage preservation of aquatic habitat, but lack specific programs for implementation.</p>	<ul style="list-style-type: none"> <li>Stream Stewardship Plans</li> <li>District project to define “Natural Flood Protection” and apply definition to design of Measure B projects</li> </ul>	<p>RWQCB Stream Protection Policy, 401 permitting and <i>Primer on Stream and River Protection for the Regulator and Program Manager</i>. DFG Stream Alteration Permits</p>	<p>Lack of right-of-way often limits opportunities to restore floodplains.</p>	<ul style="list-style-type: none"> <li>Endorse and/or monitor execution of Natural Flood Protection definition and Measure B.</li> <li>Adapt/ repackage Stream Maintenance Program and apply to City approved projects.</li> </ul>
<p><b>5. Hardening of Channels</b> Increased hardening of channels causes loss of spawning and riparian habitat, water quality degradation. <i>Example:</i></p> <ul style="list-style-type: none"> <li>San Tomas Aquino Creek has been hardened and can no longer support steelhead.</li> </ul>	<p>Chapter Eight “[SCVWD’s Stream] Stewardship Plans will be effective... if they successfully integrate and balance flood protection with habitat restoration, including removing barriers to fish passage, restoring stream beds and banks using rock and wood structures, reconnecting streams to floodplains... and restoring shaded riparian aquatic habitat.”</p>		<ul style="list-style-type: none"> <li>Stream Maintenance Program encourages biotechnical methods to stabilize banks, esp. in high-value reaches.</li> </ul>	<p>Joint Aquatic Resources Permit Application process Literature on Urban Stream Corridor Management and Restoration, e.g., <i>Restoring Streams in Cities</i> (Riley, 1998) and <i>Stream Corridor Restoration: Principles, Processes, and Practices</i> (FISRWG, 1998)</p>		<ul style="list-style-type: none"> <li>Extend JARPA to develop common goals/ standards for stream stabilization projects.</li> <li>Endorse and/or monitor execution of the FAHCE settlement agreement &amp; Fish Habitat Management Plan</li> </ul> <p><b>Collaborative Goals: Habitat.</b> See also Problems 1, 7 and 11.</p>

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<p><b>6. Stormwater Runoff Pollution</b></p> <p>High concentration of pollutants, including nutrients, salt, and pathogens/fecal coliform in creeks and reservoirs; hydrocarbons, trash enters creeks during “first flush.” Temperature is raised.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• First flush foam at Old Almaden Road, Guadalupe Creek: dissolved oxygen downstream of discharge 0.7mg/l.</li> <li>• Sanitary sewer release in Saratoga 2/21/01.</li> <li>• First flush stormwater discharge of 59,000 gallons into Calero Reservoir from horse stables.</li> </ul>	<p>Chapter Nine emphasizes the need to:</p> <ul style="list-style-type: none"> <li>• Assess the sources, fate, transport, and effects of pollutants.</li> <li>• Coordinate pollutant TMDLs with other, locally driven actions to restore creeks and wetlands.</li> <li>• Prioritize pollution-prevention actions to reduce potential effects on beneficial uses.</li> </ul>	<p>Agencies implement comprehensive stormwater pollution prevention programs to “maximum extent practicable.” Program elements are described in each agency’s urban runoff management plan and include:</p> <ul style="list-style-type: none"> <li>• Prevention of illegal discharges.</li> <li>• Elimination of illicit connections.</li> <li>• Industrial/commercial inspections.</li> <li>• Inspection of construction sites.</li> <li>• Pollution prevention during municipal maintenance activities.</li> <li>• Public education and involvement, including pesticide reduction.</li> </ul> <p>New C.3 provisions require structural treatment controls on newly developed sites.</p>	<p>The District funds approximately 30% of SCVURPPP joint activities.</p> <p>In addition to participating in joint task groups, District nonpoint source program staff focuses on preventing stormwater pollution associated with District water supply and flood control operations in accordance with the District’s Urban Runoff Management Plan.</p>	<ul style="list-style-type: none"> <li>• The RWQCB issues and enforces the SCVURPPP stormwater NPDES permit.</li> <li>• California Stormwater BMP Handbooks (CASQA, 2003).</li> </ul>	<p>Gilroy and Morgan Hill are subject to NPDES “Phase 2” stormwater regulations enforced by the Central Coast RWQCB; requirements may differ from those applicable to SCVURPPP.</p> <p>RWQCB is focused on reducing long-term average loadings of toxic pollutants; local concerns are more oriented to transient and seasonal effects of conventional pollutants.</p> <p>Limited effectiveness of enforcement, and difficulty measuring effectiveness.</p>	<ul style="list-style-type: none"> <li>• Endorse SCVURPPP and municipal stormwater pollution prevention programs.</li> <li>• Identify ways to implement similar programs in South County.</li> <li>• Encourage RWQCB to allow SCVURPPP to prioritize activities and reallocate resources to address pollutants that most significantly affect beneficial uses.</li> </ul> <p><b>Collaborative Goals: Surface Water Quality, Drinking Water Quality, Habitat.</b></p> <p>See also Problems 7, 9, 13, 14, 17, 31, 32, 41.</p>

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<p><b>7. Sediment</b></p> <p>Sediments reach the creek through urban runoff, erosion, non-point sources, and outfalls. Sediments from erosion largely from lands that are not district right of way</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Vault installation at NE corner of Via Valiente and Camden Avenue, San Jose. Sediment laden water was discharged in to the Alamos Creek, a known steelhead and native trout habitat. District notified City and DFG, which both cited the contractor.</li> <li>• Private storm water drain pipes in Holiday Lake Estates (at Anderson Reservoir) are causing shoreline erosion and sediment discharge.</li> </ul>	<p>Chapter Four</p> <p>“In cooperation with SCVURPPP, develop model public works policies, specifications, and details to encourage detention and infiltration of runoff and to control erosion and sedimentation from construction activities.”</p> <p>Chapter Nine notes need to coordinate overlapping RWQCB and local initiatives to evaluate and address the impact of sediment on stream ecosystems.</p> <p>The WMI Sediment Observation in Lotic Systems (SOILS) Work group is helping to coordinate work in San Francisquito Creek.</p>	<ul style="list-style-type: none"> <li>• Cities’ ordinances require SWPPPs and erosion and sediment control measures at construction sites.</li> <li>• SCVURPPP Performance Standard for Construction Inspection</li> <li>• SCVURPPP prioritized investigation of other stream reaches for potential impairment by sediment and is assessing Stevens Creek and Coyote Creek.</li> </ul>	<p>District staff participates in the San Francisquito Creek Watershed Council and WMI SOILS Work Group.</p> <p>District staff notifies City staff and state agencies when violations are observed.</p>	<p>State General NPDES permit for construction sites.</p> <p>CASQA Stormwater Handbook for Construction Activities</p> <p>RWQCB staff conducts roving inspections of construction sites and may apply administrative fines for violations.</p> <p>RWQCB and ABAG have prepared detailed and comprehensive manuals for erosion and sediment control at construction sites.</p> <p>ABAG conducts training for contractors.</p>	<p>Presence of sediment in creeks is due to erosion of bed and banks as well as watershed inputs.</p> <p>State General NPDES permit for construction activities applies to disturbed areas of one acre or more, but small sites on steep erodable slopes can be a major local source of sediment.</p> <p>Enforcement depends on available personnel and resources.</p>	<ul style="list-style-type: none"> <li>• Reference or incorporate SCVURPPP Performance Standard and provisions of municipal construction inspection programs.</li> <li>• Evaluate results of assessments of potential impairment by sediment.</li> </ul> <p><b>Collaborative Goals:</b> <b>Surface Water Quality, Drinking Water Quality, Habitat.</b></p> <p>See also Problems 6, 13, 14, and 41.</p>

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<p><b>8. Placement of trails within the riparian corridor</b></p> <p>Improperly designed and operated trails alongside watercourses impact habitat and District operations</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Los Gatos Creek Trail at Meridian and Leigh</li> <li>• Proposed walls on Saratoga Creek Trail</li> </ul>	<p>Section 5c5, <i>Recreational Uses in Floodplains and Riparian Areas</i>, summarizes history of efforts to resolve conflicts between recreational and habitat uses in riparian areas.</p> <p>Chapter Five emphasizes the need for an integrated planning process to produce designs that avoid conflicts among habitat, recreational, and flood management uses, and also notes the potential to use visits to stream-side areas as an opportunity for the public to learn about multiple functions of stream corridors—and to develop a shared sense of place.</p>	<p><i>Countywide Inter-jurisdictional Trail Design, Use, and Management Guidelines</i> (1999) were created with the participation of cities, towns, the District, state agencies, and other stakeholders. The Guidelines are part of the countywide trail master plan. The Coyote Lake – Harvey Bear Ranch County Park Master Plan (2003) is an example of their application.</p> <p><i>City of San Jose Riparian Corridor Policy Study</i> (1994) sets guidelines for recreational uses in or near riparian areas.</p> <p>County Parks Strategic Plan (8/03) states that County will prepare Trail Construction and Maintenance Guidelines.</p>	<p>District staff participated in the creation of the countywide Guidelines and participates in master planning for specific parks.</p> <p>District is implementing addition of trails as part of Measure B authorization.</p>		<p>Lack of sufficient right-of-way to accommodate multiple uses.</p> <p>Limited frequency of master planning and capital improvements in parks.</p> <p>Inability to control informal “use trails.”</p> <p>Large number of new trails being opened or constructed.</p>	<p>Evaluate implementation of <i>Countywide Interjurisdictional Trail Design, Management, and Use Guidelines</i> and forthcoming Trail Construction and Maintenance Guidelines.</p> <p>Improve review of trails and evaluate ways of moving trails away from sensitive riparian areas.</p> <p><b>Collaborative Goals:</b> <b>Habitat.</b></p> <p>See also Problems 24, 29, and 30.</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>9. Infiltration of Contaminated Storm Water</b></p> <p>Contaminated storm water entering the groundwater basin through storm water infiltration devices (SWIDs)—including unlined detention and retention facilities by private and public entities</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• City of Santa Clara operates bubble-ups as part of their local drainage system resulting in the collection and infiltration of untreated runoff into the groundwater basin</li> <li>• The City of Morgan Hill operates regional detention/ retention facilities which infiltrate untreated runoff.</li> <li>• Pond at Concord Circle off Vineyard Blvd off Tennant receives storm water from light industrial development.</li> </ul>	<p>Chapter Four advocates site development designs and drainage designs that detain or retain runoff while protecting groundwater.</p>	<ul style="list-style-type: none"> <li>• SCVURPPP worked with RWQCB and District staff to obtain consensus on a policy statement that appears on p. 6 of <i>Start at the Source</i> (1999) and, with participation of District staff, developed and distributed additional guidance later that year.</li> <li>• A SCVURPPP Task Group, including District staff, is working to refine the definition of “SWID”. Preliminary consensus is for District staff to review new SWIDs (other than those serving residential projects with &lt;10K SF of impervious area) and evaluate, after the first year, the need for new Guidelines.</li> </ul>	<p>District requires permits for SWIDs; negotiated agreements with cities in 1992, but final agreement and implementation are not satisfactory.</p>	<p>Provision C.3.i in RWQCB storm–water NPDES permit requires 10 foot separation from bottom of infiltration area to groundwater. (District staff regards this as insufficient.)</p>	<p>The NPDES permit and SCVURPPP policies do not apply to Gilroy and Morgan Hill.</p> <p>The C.3 Provisions address new development, but not how to monitor, alter, or remove existing SWIDs.</p> <p>The C.3 provisions only apply to projects above the set thresholds of new impervious area created.</p>	<ul style="list-style-type: none"> <li>• Endorse SCVURPPP Working Group effort to resolve issues over definition of a SWID and uses in new development in conjunction with C.3 implementation.</li> <li>• Identify means to extend use of this definition and review procedures to South County.</li> <li>• Apply refined SWID definition to cooperative City/ County/District inventory of existing devices and assess risk of each.</li> </ul> <p><b>Collaborative Goals: Groundwater Quality, Drinking Water Quality</b></p> <p>See also Problems 32 and 33.</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>10. Septic Systems</b> Leachate from septic systems reaching groundwater and reservoirs due to improperly located, operated &amp; maintained systems and high-density development. <i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Los Altos Hills using an out-dated sewage disposal from the late '60s with a setback requirement of 50 ft to creek.</li> <li>• Several documented failing septic systems (Holiday Lake Estates in the Anderson Reservoir Watershed).</li> <li>• Septic systems along Twin Creeks (Almaden W'shed).</li> <li>• Septic systems contribute nitrate to Llagas groundwater basin</li> </ul>	<p>Does not identify septic systems as a problem.</p>	<p>County DEH requires a permit to construct, reconstruct, or repair on-site sewage disposal systems, and will not issue a permit for parcels with property line closer than 300 feet (200 feet in some cities) to existing sanitary sewer. "Bulletin A" provides permit requirements, development requirements, siting requirements, and O&amp;M suggestions. County outreach program "Stewardship for Small Acreages" includes advice on construction and maintenance of septic systems.</p>	<p>District guide for well owners provides guidance on septic system O&amp;M. In general, nitrate concentrations appear to be decreasing in the Santa Clara Basin, but many South County private wells exceed MCL, and nitrate concentrations may be increasing in some subbasins. District has a Nitrate Management Program to monitor nitrate occurrence, reduce nitrate exposure, and reduce nitrate loading.</p>	<p>Septic systems are covered by California Health and Safety Code 117400. RWQCB "Policy on Discrete Sewerage Facilities" in Chapter Four of the <i>Basin Plan</i>.</p>	<p>Difficulty in detecting and remediating the many existing private septic systems that may be inadequate or failing.</p>	<ul style="list-style-type: none"> <li>• Clarify district position on setbacks from creeks and swales (done).</li> <li>• Address the issue of variances (done).</li> <li>• Examine alternatives to septic systems.</li> <li>• Clarify restrictions on "high-use" septic systems</li> <li>• Improve District/ County DEH coordination and encourage more strict interpretation of County standards.</li> </ul> <p><b>Collaborative Goals: Surface and Groundwater Quality, Drinking Water Quality</b></p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>11. Urbanization Impacts on Salmonids</b></p> <p>Urbanization affects threatened aquatic species (steelhead and salmon).</p> <p><i>Example:</i></p> <ul style="list-style-type: none"> <li>• There are over two dozen barriers to fish migration on Stevens Creek between the Bay and I-280, reducing access of steelhead to upstream reaches for spawning.</li> <li>• Boston Properties on the Guadalupe River in San Jose has built close to the top of bank, reducing shade for temperature amelioration.</li> </ul> <p>FAHCE settlement targets stream reaches for 3-5 miles downstream of reservoirs for fish habitat restoration. Successful restoration within the stream channel requires coordinated efforts to protect riparian areas and facilitate reconnection/creation of floodplains.</p>	<p>Chapter Eight “[SCVWD Stream} Stewardship Plans will be effective in advancing the WMI’s vision if they successfully integrate and balance flood protection with habitat restoration, including removing or remediating barriers to fish passage...” “Convene and facilitate groups of stakeholders to participate in adaptive management of watersheds.” “Prepare and publish periodic reports on the status of stream protection and restoration.” Coordinate Stream Stewardship Planning with floodplain planning, habitat conservation planning, and stream TMDLs.</p>	<ul style="list-style-type: none"> <li>• The District has committed to rehabilitation of three of the Stevens Creek barriers and is partnering with the City of Cupertino to fix two additional barriers.</li> <li>• City of Cupertino’s master plan for Blackberry Park (in prep.) integrates maintenance of stream habitat.</li> <li>• San Jose participated with the District, Corps of Engineers, and other stakeholders in the Guadalupe River Flood Control Project Collaborative.</li> </ul>	<p>FAHCE settlement agreement commits District to provide suitable instream conditions, including adequate passage flows in the winter/spring, suitable summer temperatures and adequate spawning gravels, instream cover and shade.</p> <p>Stream Maintenance Program is designed to protect aquatic habitat during bank repair, dredging, and other maintenance.</p> <p>“Natural flood protection” definition is to guide future capital projects (Measure B).</p>	<p>CDFG <i>Salmonid Habitat Restoration Manual</i>.</p> <p>Guidebooks for restoring urban streams (e.g., Riley, 1998, FISRWG, 1998)</p>	<p>Stream corridor restoration is expensive and takes a long time.</p> <p>Guidance generally recommends addressing flooding, land use, recreation, pollution, water supply, and habitat as within the context of a long-term integrated plan.</p>	<ul style="list-style-type: none"> <li>• Explore ways that Collaborative’s Guidelines and Standards can support the FAHCE settlement agreement and Fish Habitat Management Plan.</li> <li>• Use Stream Stewardship Plans as a starting point for community engagement in habitat restoration/ flood control projects (restoration of Napa River in City of Napa is an example).</li> <li>• Target floodplain management efforts to stream restoration zone.</li> </ul> <p><b>Collaborative Goals:</b> <b>Habitat</b></p> <p>See also Problems 1, 4, and 5.</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>12. Problems for Creekside Property Owners</b></p> <p>Creek owners' concerns:</p> <ul style="list-style-type: none"> <li>• Trash and pollution in creek</li> <li>• Maintenance of creek</li> <li>• Activities of other creek owners</li> <li>• Development regulations and prohibitions</li> <li>• Loss of creek habitat</li> <li>• Trespass through creeks</li> </ul> <p>Owners next to public creeks:</p> <ul style="list-style-type: none"> <li>• Undesirable activities on adjacent lands</li> <li>• Prohibited access to adjacent public land</li> <li>• Frequency and extent of maintenance</li> </ul>	<p>Chapter Five includes the following "Next Steps":</p> <ul style="list-style-type: none"> <li>• "Encourage cities and towns to establish special review requirements for expansion or substantial remodeling on streamside residential properties"</li> <li>• "Develop and distribute information to creekside land-owners and users..."</li> <li>• "Mobilize creekside residents to remove invasive or non-native species"</li> <li>• "Investigate.... allowing creekside property owners to remove fencing..."</li> </ul>	<p>Some, but not all, municipalities have ordinances governing activities in or around privately owned watercourses.</p> <p><i>Example</i></p> <p>City of Milpitas Title XI, Urban Runoff and Watercourse Protection:</p> <ul style="list-style-type: none"> <li>• ...."No person shall... unless an encroachment permit is issued... Construct, alter, enlarge, connect to, discharge to, change, or remove any structure ... modify the natural flow of water... deposit in, plant in, or remove any material from a city owned or maintained watercourse, including its banks, except as required for necessary maintenance."</li> </ul>	<p>District distributes "Stream Care Guide" to property owners.</p> <p>District enforces Ordinance 83-2.</p>	<p>District worked with other flood control agencies and ABAG to create the Joint Aquatic Resources Permit Application (JARPA) process to facilitate permitting of small projects in creeks.</p>	<p>Maintenance of and alterations to creeks frequently become a matter of dispute among neighboring property owners and between property owners &amp; public agencies.</p> <p>Prevention and resolution of such disputes may require a process of bringing property owners and agency staff together to plan joint stewardship of the common resource, rather than creating general rules or standards that attempt to address all the specific problems and circumstances that may occur.</p>	<ul style="list-style-type: none"> <li>• Information and resources for property owners on how to engage the District and municipal staff in solving problems and developing a neighborhood planning process.</li> <li>• Guidelines and information on resolving problems related to trash, pollution, trespass, poor stewardship, etc.</li> <li>• Develop strategy in collaboration with District Community Relations Unit.</li> </ul> <p><b>Collaborative Goals: Habitat, Surface Water Quality</b></p> <p>See also Problems 16 and 20.</p>

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<p><b>13. Grading</b> Construction and agricultural grading results in excessive sediment discharges to streams and waterways. <i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Silver Creek Development filled creek with sediment.</li> <li>• Fisher Creek farming activities grade all the way to and through creek.</li> </ul>	<p>Section 3e2: “Study and consider how to implement elements of the MBNMS WQPP Action Plan for Agriculture and Rural Lands.”</p>	<ul style="list-style-type: none"> <li>• Cities enforce grading ordinances.</li> <li>• Cities require Storm Water Pollution Prevention Plans and erosion and sediment control measures at construction sites.</li> <li>• County has used administrative fines and legal actions to enforce against unpermitted grading in unincorporated area.</li> </ul>		<ul style="list-style-type: none"> <li>• Monterey Bay National Marine Sanctuary Water Quality Protection Program (MBNMS WQPP) emphasizes cooperation with Farm Bureaus and industry associations to promote BMPs.</li> <li>• RWQCB Erosion and Sediment Control Manual</li> <li>• ABAG Erosion and Sediment Control Manual</li> <li>• CASQA Stormwater Best Management Handbook (Construction).</li> </ul>	<p>County Grading Ordinance exempts agriculture. Grading ordinances may exempt smaller sites which, under specific conditions (e.g. steep slopes, erodable soils, disturbance) can be significant sources of sediment.</p>	<ul style="list-style-type: none"> <li>• Identify appropriate BMPs for agricultural grading near creeks.</li> <li>• Reference ABAG, RWQCB, SCVURPPP standards for erosion &amp; sediment control during construction.</li> <li>• Endorse/promote SCVURPPP and municipal efforts to improve control over construction grading.</li> </ul> <p><b>Collaborative Goals: Surface Water Quality and Habitat</b> See also Problems 7, and 14.</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>14. Sediment</b></p> <p>Development outside District jurisdiction can lead to erosion and sediment being washed into District streams.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• In unincorporated Saratoga, in Calabazas Watershed, Chateau Masson installed a paved parking area. The runoff from the paved area caused serious erosion and substantial sediments washed into Calabazas Creek.</li> <li>• Sediment discharges to Coyote-Alamitos Canal from adjacent development and from grading vineyard above Lexington Reservoir.</li> </ul>	<p>Section 4f: “Cities, towns, and the County should revise their standards for site development and drainage systems. In areas where increased runoff could cause increased erosion of creek beds and banks, siltation, or other effects on streams, new and rebuilt sites and drainage systems should (where feasible) incorporate features to detain or retain runoff.”</p>	<ul style="list-style-type: none"> <li>• Potential for off-site erosion must be documented in initial study (CEQA Checklist VIII.c)</li> <li>• Municipal stormwater ordinances prohibit conditions that could cause pollutants (e.g., sediment) to enter streams.</li> <li>• Municipal drainage requirements generally prohibit designs that would cause erosion off-site.</li> </ul>	<p>District reviews drainage design for projects within its jurisdiction.</p>	<p>Potential enforcement actions by RWQCB and DFG.</p>	<p>Action Plan, SCVURPPP requirements limited to Santa Clara Basin. Difficulty in enforcement.</p>	<ul style="list-style-type: none"> <li>• Guidance on interpreting CEQA Checklist VIII.c.</li> <li>• Incorporate or reference design guidance to minimize erosion caused by outfalls.</li> </ul> <p><b>Collaborative Goal: Surface Water Quality. Drinking Water Quality</b></p> <p>See also Problems 6, 7, and 13</p>

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<p><b>15. Pump Discharges</b></p> <p>Drainage pump discharges compete for hydraulic capacity with in-channel flows.</p> <p><i>Example:</i></p> <ul style="list-style-type: none"> <li>• City and CalTrans pumps discharging to Lower Guadalupe River.</li> </ul>		<p>Cities, towns, and County may require O&amp;M plans for detention basins, including pump maintenance and operation. These plans may be backed by bonds.</p>	<p>District issues permits for outfalls.</p>		<p>District outfall permits do not regulate discharge. Difficult to enforce discharge limits during flooding.</p>	<p>Develop program to set guidelines &amp; standards for discharges under various flooding conditions.</p> <p><b>Collaborative Goals: Flooding</b></p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>16. Private Maintenance</b></p> <p>Lack, or improper methods, of maintenance in reaches where District does not own right of way.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>Private owners fail to remove debris or invasive species in Alamitos Creek.</li> <li>Private owners use concrete rip-rap or retaining walls to stabilize localized erosion. Adobe Creek has many examples.</li> </ul>	<p>Chapter Five, Next Steps</p> <ul style="list-style-type: none"> <li>“Mobilize creekside residents to remove invasive and non-native species”</li> <li>“Investigate, with SCVWD, allowing creekside property owners to remove fencing to restore a connection with the creek.”</li> <li>“Develop and distribute information to creekside landowners and land users about protection and enhancement.”</li> </ul>	<p><i>Example:</i></p> <p>“Every person owning, operating or leasing property through which a watercourse passes, shall keep and maintain that part of the watercourse within the property reasonably free of trash, debris, excessive vegetation and other obstacles .... shall maintain existing privately owned structures within or adjacent to a watercourse, so that such structures will not become a hazard to the use, function or physical integrity of the watercourse... shall not remove healthy bank vegetation beyond that actually necessary for maintenance, nor remove the vegetation in such a manner as to increase the vulnerability ... to erosion.”</p> <p>(Milpitas MC IX-16-9)</p>	<p>District distributes the <i>Stream Care Guide</i> to property owners.</p> <p>District requires permits for work in creeks.</p>	<p>Alterations to creeks may require 401 certification from RWQCB, DFG Stream Alteration Permit, other permissions.</p> <p>Santa Clara Valley Chapter of the California Native Plant Society does outreach and education on use of native plants and removal of exotics.</p>	<p>Difficulty in obtaining permits may lead to owners to attempt unpermitted fixes.</p> <p>District Stream Maintenance Program standards apply only to District-controlled stream reaches.</p> <p>Problems are dealt with parcel-by-parcel instead of by stream reach.</p> <p>Private owners may need individual consultation, not just guidance documents.</p>	<ul style="list-style-type: none"> <li>Information and resources for property owners to plan and implement maintenance.</li> <li>Process for engaging neighborhoods and public agency staff to address maintenance issues.</li> </ul> <p><b>Collaborative Goals:</b> <b>Surface Water Quality, Flood Protection, and Habitat</b></p> <p>See also Problems 12 and 20.</p>

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<p><b>17. Detention Basins</b></p> <p>Multiple small detention basins aren't properly maintained or operated.</p> <p>Example:</p> <ul style="list-style-type: none"> <li>Morgan Hill detention basins were installed prior to establishment of appropriate design guidelines and are poorly maintained.</li> </ul>	<p>WAP Section 4d emphasizes the use of "lower cost, more aesthetically pleasing" rain gardens or bioretention areas instead of detention basins.</p>	<p>Example:</p> <ul style="list-style-type: none"> <li>Morgan Hill Storm Drain Master Plan includes sizing criteria for ponding basins based on system-wide hydraulic analysis.</li> </ul> <p>(However, not all cities have such detailed criteria.)</p>		<p>C.3 requirements and widely used guidance (e.g. CASQA Stormwater BMP Handbooks, WEF/ASCE Manual of Practice) encourage use of detention basins for stormwater treatment. (This will likely increase the prevalence of detention basins.)</p>	<p>Sizing criteria for stormwater treatment basins and flood-control basins don't include requirements or recommendations for system-wide hydraulic analysis.</p>	<p>Identify and encourage other alternatives for detaining/retaining stormwater.</p> <p>Encourage municipalities to adopt sizing criteria based on system-wide hydraulic analysis.</p> <p>Collaborative Goal: <i>Flood Protection</i></p>



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<p><b>19. Encroachment</b> Structures built at top of bank (also, built within District rights of way) <i>Examples:</i></p> <ul style="list-style-type: none"> <li>Proposed hotel in Campbell on Los Gatos Creek</li> <li>Boston Properties on the Guadalupe River</li> <li>Buildings in Saratoga on San Tomas Aquino Creek</li> <li>In Los Gatos on Alameda Creek</li> <li>In San Jose on Canoas Creek</li> </ul>	<p>WAP Ch. 5 advocates comprehensive, integrated planning for multiple uses in riparian corridors and floodplains.</p>	<p>City ordinances generally forbid construction in flood hazard areas. <i>Example:</i></p> <ul style="list-style-type: none"> <li>City of Milpitas Floodplain Management Ordinance.</li> </ul>	<p>Ordinance 83-2 requires District permit for construction within 50 feet of top of bank.</p>	<p>CEQA Checklist VIII.i): Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</p>	<p>Plans may be oriented to City-required setbacks from property line, rather than required setbacks from creek.</p>	<ul style="list-style-type: none"> <li>Supplement guidance for CEQA review.</li> <li>Enhance CRS program.</li> <li>Establish/expand criteria that trigger District review and permitting.</li> <li>Develop an integrated planning process to proactively plan development and restoration of specific streamside areas (WMI approach).</li> </ul> <p><b>Collaborative Goals:</b> <i>Flood Protection, Surface Water Quality, and Habitat.</i></p> <p>Also see Problem 2.</p>

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<p><b>20. Invasive Plants</b></p> <p>Introduction of invasive species from landscaping activities</p> <p><i>Example</i></p> <ul style="list-style-type: none"> <li>Unauthorized planting of broom on Summerhill Creek U/S of Gronwall Lane. The planting of 1-gallon containers several years ago is a seed source for the entire d/s Permanente Watershed.</li> </ul>	<p>WAP Ch.7 emphasizes preservation and restoration of biodiversity through a comprehensive planning process (HCPs/NCCP).</p>	<p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>San Jose General Plan Natural Resource Goals state that riparian areas should be protected from exotics and that restoration of native plants is encouraged.</li> <li>San Jose Riparian Corridor Policy Study Appendix B: "Plant Species Suitable for Use Adjacent to Riparian Corridors."</li> <li>Los Gatos General Plan Implementing Strategy C.1.4.1: "Native Plants: Review site plans to ensure that native or other appropriate plant materials are used to reduce maintenance and irrigation costs and disruption of the native ecology."</li> </ul>	<p>Ordinance 83-2 Section 6.1(f) prohibits planting of flora without permit.</p>	<p>Santa Clara Valley Chapter of the California Native Plant Society does outreach and education on use of native plants and removal of exotics.</p>	<p>Native plants may not be suited to landscaped environments.</p>	<ul style="list-style-type: none"> <li>Endorse or participate in public education regarding the spread of invasive exotic plants.</li> <li>Create or adapt landscape design guidance and reference available plant lists.</li> </ul> <p>Collaborative Goals: <i>Habitat</i></p> <p>See also Problems 12 and 16.</p>

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<p><b>21. Human/pet presence</b></p> <p>Increased human activities disturbs wildlife and habitat</p> <p><i>Example</i></p> <ul style="list-style-type: none"> <li>No native mammals were present when domestic dogs were present on Lower Coyote Creek</li> </ul>	<p>Chapter Five advocates comprehensive, integrated planning for multiple uses in riparian corridors and floodplains, with trails placed outside sensitive riparian areas.</p>	<p><a href="#">Dogs must be leashed in all County Parks</a> (except Hellyer Dog Park); dogs are excluded from sensitive areas.</p> <p>San Jose’s Riparian Corridor Policy Study specifies separation of trails and other recreational uses from sensitive habitat areas.</p> <p>San Jose’s Watson Dog Park opened in August 2003.</p>			<p>The most “natural” areas may also be among the least patrolled for compliance with leash laws.</p>	<ul style="list-style-type: none"> <li>Promote enforcement of leash laws, especially those applying to City and County Parks.</li> <li>Trail guidelines should account for potential for wildlife disturbance by people and pets.</li> </ul> <p>Collaborative Goals: <i>Habitat</i></p> <p>See also Problems 3, 22, 23, 26, 27, and 28</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>22. Homelessness</b> Unregulated human habitation adjacent to streams pollutes surface water. <i>Example</i> Los Gatos Creek near San Carlos Ave. The homeless use the creek and banks for toilets.</p>		<p><a href="#">The Santa Clara Countywide Homeless Continuum of Care Plan</a> (2001-2006) notes the problem of homeless people residing along creeks and includes a comprehensive strategy to address homelessness. The County provides about 1000 beds in emergency shelters and an additional 1200 beds of transitional housing.</p>	<p>District participated in preparation of Master Plan for Los Gatos Creek County Park.</p>	<p>In addition to providing a broad range of services to homeless people, the City of San Jose provide grants to nonprofit organizations that serve the homeless.</p>		<ul style="list-style-type: none"> <li>• Inventory and document encampment areas.</li> <li>• Document frequency of patrols and when encampments are found.</li> <li>• Organize multi-agency response to relocate people and discourage encampments.</li> </ul>
<p><b>23. Homelessness</b> Unregulated human habitation adjacent to streams causes damage to vegetation <i>Example</i></p> <ul style="list-style-type: none"> <li>• Homeless encampments on Coyote Creek near Watson Park trampled and removed riparian vegetation.</li> </ul>		<p>The <a href="#">Master Plan for Los Gatos Creek County Park</a> includes: “Monitor park areas for homeless encampments and remove them when found.”</p>				<p>Collaborative Goals: <i>Habitat</i> See also Problems 3, 21, 26, 27, and 28</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>24. Damage to Vegetation</b> Increased human activities causes damage to vegetation (see <i>Trails</i>)</p>	<p>Chapter Five advocates comprehensive, integrated planning for multiple uses in riparian corridors and floodplains so that trails and other active uses are separated from riparian habitat.</p>	<p><i>Countywide Interjurisdictional Trail Design, Use, and Management Guidelines.</i></p>				<p>Evaluate implementation of <i>Countywide Interjurisdictional Trail Design, Management, and Use Guidelines</i> and forthcoming Trail Construction and Maintenance Guidelines.</p> <p>Collaborative Goals: Flood Protection, <i>Habitat</i></p> <p>See also Problems 8, 21, 22, and 23</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>25. Peak Flows</b> Increased peak flows from developments/impervious surfaces. <i>Example</i></p> <ul style="list-style-type: none"> <li>• Salmon tracked in Guadalupe were washed downstream during each large storm.</li> </ul>	<p>Chapter Four: “The WMI advocates site development designs and drainage system designs that detain or retain runoff where needed to protect streams from flash runoff, erosion and pollutants, and to protect from downstream flooding, while preventing groundwater pollution.”</p>	<p>Hydromodification Management Plan (HMP, due 1/04) to evaluate on-site and off-site development BMPs, drainage-area facilities, and in-stream BMPs and recommend solutions in a Guidance Manual.</p>	<ul style="list-style-type: none"> <li>• District is leading preparation of the HMP.</li> <li>• District stream restoration projects seek to create resting pools/ refugia for fish.</li> <li>• FAHCE Settlement Agreement</li> </ul>	<p>RWQCB Stream Protection Program</p>	<p>In-stream BMPs need to address fish habitat as well as geomorphic stability.</p>	<ul style="list-style-type: none"> <li>• Develop means to address the problem of flash flows from outfalls (e.g. by providing stilling basins) in connection with stream restoration.</li> </ul> <p>Collaborative Goals: Flood Protection, Habitat See also Problems 1, 11, 15, 17, 18</p>
<p><b>26. Trash</b> Increase Trash/Litter along the Creeks <i>Example</i></p> <ul style="list-style-type: none"> <li>• Increased demand cost to District to remove trash on Alamitos.</li> </ul>	<p>See Problem 3.</p>	<p>See Problem 3.</p>	<p>See Problem 3.</p>	<p>See Problem 3.</p>	<p>See Problem 3.</p>	<p>See Problem 3.</p> <p>Collaborative Goals: Surface Water Quality and Habitat See Problems 3, 21, 22, 23, 27, 28.</p>

**Water Resources Protection Problems Matrix**

**DRAFT FOR COLLABORATIVE REVIEW**

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>27. Feral Animals</b> Human and feral/pets disturb/injure wildlife</p>	<p>Chapter Seven Addresses this problem and recommends solutions in context of comprehensive conservation planning, (e.g., HCP, e.g. expansion of the NWR).</p>	<p>San Jose funded a voucher program for spay/neuter; funding shifted to new animal shelter on Monterey Road that will spay domestic animals.</p>		<p>Advocacy organizations have opposed eradication programs in favor of spay/neuter release.</p>		<ul style="list-style-type: none"> <li>• Trail design</li> <li>• Education</li> <li>• Enforcement</li> <li>• Indicators of success</li> </ul> <p>Collaborative Goals: <i>Habitat</i> See also Problems 21, 22 and 23.</p>
<p><b>28. Vandalism</b> Illegal discharges, graffiti, fire</p>	<p>Chapter Eight “Watershed stewardship should recognize the importance of enforcement of regulations that govern alterations and impacts to streams.”</p>	<p>City police and code enforcement, and County Sheriff and Park Rangers, enforce laws against vandalism and public nuisances.  Most cities have graffiti abatement programs.</p>				<ul style="list-style-type: none"> <li>• Education</li> <li>• Abatement</li> <li>• Enforcement</li> <li>• Indicators of success</li> </ul> <p>Collaborative Goals: Surface Water Quality and Habitat</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>29. Trails/ Maintenance Conflict</b></p> <p>Trails limit flexibility for maintenance activities</p> <p><i>Example</i></p> <ul style="list-style-type: none"> <li>Additional effort required to accommodate public use of trails during maintenance operations on Alamitos and Stevens Creeks.</li> </ul>	<p>Chapter Five</p> <p>“Working with the County, municipalities, District, and other agencies, provide a forum and develop a process for integrated planning of floodplains and riparian corridors.”</p> <p>Integrated plans should incorporate the Cities’ riparian corridor...</p>	<ul style="list-style-type: none"> <li>County invites multi-agency participation in park and trails master planning.</li> <li>County Parks Strategic Plan (2003) plans preparation of Guidelines for trail construction and maintenance.</li> </ul>	<p>District participates in trail and park master planning.</p>		<ul style="list-style-type: none"> <li>District may need to clarify its policy on accommodating multiple uses.</li> <li>May need to improve communication among operating agencies.</li> </ul>	<p>Evaluate implementation of <i>Countywide Interjurisdictional Trail Design, Management, and Use Guidelines</i> and forthcoming Trail Construction and Maintenance Guidelines.</p> <p>Develop a forum and process for integrated planning [WMI approach]</p>
<p><b>30. Trails/ Flood Protection Conflict</b></p> <p>Trail requirements infringe upon flood protection structures.</p> <p><i>Example</i></p> <ul style="list-style-type: none"> <li>Proposed bridge on Calabazas. Retaining walls on San Tomas Aquino creek.</li> </ul>	<p>...policies, the policies and procedures being developed by the Water Resources Protection Collaborative, applicable provisions in... General Plans, existing and planned recreational uses... the <i>Countywide Trails Master Plan...</i> and benefits available under FEMA’s community rating system.”</p>					<p>Collaborative Goals: Flood Protection, Habitat</p> <p>See also Problems 8, 24</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>31. Irrigation runoff</b> Irrigation water runoff into creeks contains nutrients and pesticides</p>	<p>Chapter Nine “Conduct public outreach programs encouraging integrated pest management and proper and limited use of pesticides.”</p>	<ul style="list-style-type: none"> <li>• Through implementation of SCVURPPP Municipal Maintenance Element and DPR requirements, cities and towns have implemented integrated pest management and minimize fertilizer applications on parks and public lands.</li> <li>• SCVURPPP participates in regional public education and promotes local efforts aimed at reduction of pesticide use on private property.</li> <li>• Municipalities distribute information to gardeners.</li> <li>• Efficient landscape ordinances minimize amount of irrigation runoff.</li> </ul>	<p>District Nonpoint Source Program insures BMPs are used in District operations. District Stream Maintenance Program specifies herbicides to be used in vegetation control along and within creeks.</p>	<ul style="list-style-type: none"> <li>• RWQCB TMDL for diazinon in urban creeks.</li> <li>• USEPA recently negotiated a phaseout of diazinon.</li> </ul>	<p>Pesticides are legal and are heavily promoted by manufacturers.</p>	<p>Endorse and assist pesticide reduction outreach and education by municipalities, SCVURPPP, BASMAA and other agencies</p> <p>Collaborative Goal: Surface Water Quality and Groundwater Quality See also Problem 6.</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>32. Storm Water Infiltration Devices</b></p> <p>Mobilizing and spreading <b>groundwater</b> contamination resulting from the Installation of SWID in the vicinity of, and up-gradient to, groundwater contamination sites</p> <p><i>Example:</i></p> <ul style="list-style-type: none"> <li>The Joleen Way (Glasstek) Case in the City of Morgan Hill was an illegal discharge in which water from a retention pond and a dry well prevented clean-up of groundwater contamination and pushed the plume migration</li> </ul>		<p>Cities generally refer applicants to District for permits for drywells and detention basins, but City staff may not understand current District concerns and requirements.</p> <p>SCVURPPP C.3 infiltration workgroup is addressing this issue.</p>	<ul style="list-style-type: none"> <li>District generally prohibits SWIDs except for single-family residential sites.</li> <li>District monitors and maps areas extent of groundwater pollution.</li> </ul>			<ul style="list-style-type: none"> <li>[See possible outcomes for Problem 9.]</li> <li>Define roles and responsibilities for SWID permitting and monitoring.</li> <li>Require review of proximity to polluted groundwater and as necessary, hydro-geological analysis.</li> </ul> <p>Collaborative Goal: Groundwater Quality</p> <p>Note: Problem 9 refers to <i>design</i> of SWIDs &amp; treatment capabilities; this item refers to <i>location</i> of SWIDs relative to existing groundwater pollution. See also Problems 33 and 37</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>33. Groundwater Pollution</b></p> <p>Groundwater pollution prevention, mitigation, and monitoring measures are not required for the approval of high-risk projects in sensitive areas of the groundwater basin</p> <p><i>Example:</i></p> <ul style="list-style-type: none"> <li>Olin Case – the current perchlorate contamination case was created by a facility located outside our reviewing/permitting jurisdiction</li> </ul>		<p>Local agencies implement six CUPA programs to reduce the risk of pollution and protecting public health &amp; safety:</p> <ul style="list-style-type: none"> <li>Hazardous Materials Business/ Emergency Response Plan</li> <li>Hazardous Waste/ Tiered Permitting</li> <li>Underground Storage Tanks</li> <li>Aboveground Storage Tanks (SPCC only)</li> <li>California Accidental Release Program</li> <li>UFC Hazardous Materials Mgt. Plan.</li> </ul> <p>Cities also do industrial sewage pretreatment and industrial stormwater compliance.</p>	<p>District operates leaking UST oversight program and provides peer review of site management plans where groundwater quality is threatened.</p>	<p>RWQCB requires environmental monitoring at high-risk UST facilities.</p>	<p>CUPA, sewer, and stormwater inspection programs may lack consideration of site hydrogeology and site-specific risks to groundwater.</p>	<ul style="list-style-type: none"> <li>Consider hydrogeology and risk to groundwater when permitting projects; where appropriate, add requirements for monitoring wells.</li> <li>Review implementation of existing programs for effectiveness in protecting groundwater.</li> </ul> <p>Collaborative Goal: Groundwater Quality</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>34. Groundwater Extractions</b> Groundwater extractions exceeding critical levels [Note: this is a <i>potential</i> problem, based on South County growth projections and currently limited recharge capacity in some sub-basins.]</p>	<p>Section 6e recommends that SCVWD, San Jose, and other agencies use the IWRP process to focus and coordinate conservation &amp; recycling and link to an overall water supply strategy.</p>	<p>Gilroy, Morgan Hill, San Jose, Santa Clara, Sunnyvale, and other well-water retailers report extractions.</p>	<ul style="list-style-type: none"> <li>District's Water Revenue Program monitors extractions and maintains a database with all extraction information.</li> </ul>	<p>USGS reports groundwater withdrawals and levels in the <i>Groundwater Atlas</i>.</p>	<ul style="list-style-type: none"> <li>District can't plan recharge and other groundwater management activities with the degree of certainty it would prefer.</li> </ul>	<p>District desires to develop agreements that estimate retailers' future withdrawals.</p>
<p><b>35. Groundwater Extractions</b> Groundwater extractions exceeding critical levels</p>			<ul style="list-style-type: none"> <li>District monitors groundwater elevations and subsidence.</li> </ul>		<ul style="list-style-type: none"> <li>District lacks assurances about how much groundwater retailers will withdraw in future years.</li> </ul>	
<p><b>36. Groundwater Extractions</b> Groundwater extractions exceeding critical levels</p>			<p>Collaborative Goals: Drinking Water and Groundwater Quantity</p>			

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>37. Abandoned Wells</b> Contaminants entering aquifer systems through wells damaged or buried during land development <i>Example</i></p> <ul style="list-style-type: none"> <li>• MTBE from fuel leak site at Cottle Rd Santa Teresa Blvd</li> </ul>		<p>Cities refer applicants to District for well permits, but may not systematically require an assessment of potential hazard posed by abandoned wells on-site.</p>	<ul style="list-style-type: none"> <li>• District enforces well ordinance (90-1).</li> <li>• District distributes Guide for Private Well Owners</li> </ul>		<p>Lack of systematic assessment of the potential presence of wells as part of the development approval process.</p>	<p>Develop method, roles, responsibilities, procedures for assessing potential presence of wells as part of CEQA process.</p> <p>Collaborative Goal: <i>Groundwater Quality</i></p>
<p><b>38. Artesian Wells</b> Nuisance conditions caused by flowing artesian wells damaged or buried during land development (see photos) <i>Examples</i></p> <ul style="list-style-type: none"> <li>• Street damaged, Lafayette and Hope Sts</li> <li>• Well under building, can't be destroyed, San Antonio Ave, San Antonio Rd</li> <li>• Well under commercial building destroyed stored records, 1<sup>st</sup> and Taylor</li> </ul>		<p>Cities refer applicants to District for well permits, but may not systematically require an assessment of potential hazard posed by artesian conditions on-site.</p>				<p>Develop method, roles, responsibilities, procedures for assessing potential presence of artesian conditions as part of CEQA process.</p> <p>Collaborative Goal: <i>Groundwater Quantity</i></p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>39. Erosion from outfalls</b></p> <p>Erosion in the shoreline of reservoirs caused by drain pipes from residential development</p> <p><i>Example:</i></p> <ul style="list-style-type: none"> <li>• Anderson Reservoir</li> </ul>		<p>Cities or County review detailed drainage system design, including construction of outfalls.</p>	<p>Requires permit for construction of outfalls.</p>			<p>Incorporate or reference design guidance to minimize erosion caused by concentrated drainage.</p> <p>Improve enforcement of requirements for permits for outfalls.</p> <p>Collaborative Goals: Flood Protection, Drinking Water Quality See also Problems 1, 7, 14</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>40. Livestock</b> Exposing reservoirs to animal waste by allowing livestock direct access to the reservoir <i>Example:</i>  <ul style="list-style-type: none"> <li>Anderson Reservoir</li> </ul> </p>	<p>Chapter Eight                      “Watershed stewardship should recognize the importance of enforcement of regulations that govern alterations and impacts to streams. In rural areas, this should include controlling or eliminating livestock access to streamside areas.”                      “Study and consider how to adapt and implement elements of the [MBNMS WQPP for Agriculture and Rural Lands.]”</p>		<p>District’s <i>Comprehensive Reservoir Watershed Management Plan</i> (2002) suggests strategies in USEPA (1993), <i>Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters</i>.</p>	<ul style="list-style-type: none"> <li>County’s <i>Grazing Solutions</i> (GRASS) project references the California Rangeland WQ Management Plan. Emphasis is on voluntary compliance.</li> <li><i>Monterey Bay National Marine Sanctuary Water Quality Protection Plan for Agriculture and Rural Lands</i></li> </ul>	<p>District monitoring indicates pathogen concentrations are below the thresholds that would be considered a problem or would trigger corrective actions.</p>	<p>Evaluate/update District Reservoir Watershed Management Plan.</p> <p>Collaborative Goal: Drinking Water Quality See also Problems 13 and 41.</p>

<b>Problem (identified by District)</b>	<b>WMI Watershed Action Plan</b>	<b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b>	<b>District Policies, Guidelines &amp; Standards</b>	<b>Other Policies, Guidelines &amp; Standards</b>	<b>Noted Gaps &amp; Obstacles</b>	<b>Possible outcomes of Collaborative</b>
<p><b>41. Non-point pollution</b></p> <p>Harmful practices by property owners within the watershed cause pollution of the reservoirs</p>		<p>SCVURPPP Urban Runoff Management Plan and Performance Standards.</p> <p>Cities/towns/County implement comprehensive outreach and education in cooperation with SCVURPPP, BASMAA and other agencies.</p> <p>Cities/towns/County inspect commercial &amp; industrial businesses and construction sites.</p>	<p>District funds and participates in outreach and education through SCVURPPP.</p>	<p>RWQCB NPDES permits.</p> <p>CASQA Handbooks</p>	<p>Different pollution prevention requirements apply to Morgan Hill and Gilroy.</p>	<p>Collaborative Goal: Surface Water Quality See also Problem 6.</p>

**Water Resources Protection Problems Matrix**

**DRAFT FOR COLLABORATIVE REVIEW**

<b>Problem (identified by District)</b>	<b>WMI Watershed Action Plan</b>	<b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b>	<b>District Policies, Guidelines &amp; Standards</b>	<b>Other Policies, Guidelines &amp; Standards</b>	<b>Noted Gaps &amp; Obstacles</b>	<b>Possible outcomes of Collaborative</b>
<p><b>42. Rural Roads</b> Runoff from rural dirt roads, fire breaks and road cuts increases turbidity, organics, and pollutant loading to the reservoirs</p>	<p>WAP Section 4d notes potential for erosion &amp; sedimentation from rural roads; section 4g encourages development, distribution, and implementation of model policies (in cooperation with SCVURPPP).</p>	<p>County, Towns &amp; Cities implement SCVURPPP <a href="#">Performance Standard for Rural Public Works Maintenance and Support Activities</a></p>	<p>District implements SCVURPPP Performance Standard and Stream Maintenance Program requirements</p>	<p>Monterey Bay National Marine Sanctuary Water Pollution Prevention Program <a href="#">Action Plan for Agricultural and Rural Lands</a>, Section VI: Public Lands and Rural Roads  Handbook for Forest and Ranch Roads (Weaver and Hagens, Pacific Watershed Associates, 1994)</p>	<p>SCVURPPP Performance Standard not applicable to Gilroy or Morgan Hill.</p>	<ul style="list-style-type: none"> <li>Review/endorse SCVURPPP Performance Standard.</li> <li>Identify ways to apply Performance Standard in South County.</li> </ul> <p>Collaborative Goal: Surface Water Quality</p>

<p><b>Problem (identified by District)</b></p>	<p><b>WMI Watershed Action Plan</b></p>	<p><b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b></p>	<p><b>District Policies, Guidelines &amp; Standards</b></p>	<p><b>Other Policies, Guidelines &amp; Standards</b></p>	<p><b>Noted Gaps &amp; Obstacles</b></p>	<p><b>Possible outcomes of Collaborative</b></p>
<p><b>43. Water Conservation</b> Inefficient use of water in the landscaping sector resulting from limited implementation and/or enforcement of the Model Efficient Landscape Ordinance (AB 325, 1990).</p>	<p>WAP Chapter 6d describes current water conservation and recycling programs. Chapter 6e recommends that the IWRP process be used to focus and coordinate conservation and recycling programs by different agencies.</p>	<p>Cities have adopted and implement efficient landscape ordinances. <i>Example</i></p> <ul style="list-style-type: none"> <li>Palo Alto recently revised their landscape ordinance and added a requirement for a certificate of substantial completion.</li> </ul> <p>Cities have adopted general water conservation ordinances and conduct extensive outreach on water conservation. Cities have adopted ordinances prohibiting use of potable water when recycled water is available. South Bay Water Recycling Program promotes use of recycled</p>	<p><i>Rules of Thumb for Water-Wise Gardening</i> (22 pp. booklet) <i>Groundwater Management Plan</i> <i>Urban Water Management Plan</i> (2001) <i>Integrated Water Resources Plan</i> (2003, in prep.) Numerous programs implemented by the Water Use Efficiency Unit.</p>	<p><i>Memorandum of Understanding Regarding Urban Water Conservation in California</i> (includes BMPs, which are updated regularly by the California Urban Water Conservation Council). Water Code 13550 mandates use of recycled water where available.</p>	<p>The District's Water Use Efficiency Unit's annual report for FY 2001-2002 states: "Last fiscal year, water savings from the District's numerous conservation programs reached a total of 29,000 acre-feet, putting the WUE unit on schedule to meet or exceed its 2020 IWRP goal."</p>	<p>Collaborative Goals: Surface, Groundwater, and Drinking Water Quantity</p>

**Water Resources Protection Problems Matrix**

**DRAFT FOR COLLABORATIVE REVIEW**

<b>Problem (identified by District)</b>	<b>WMI Watershed Action Plan</b>	<b>SCVURPPP &amp; City/Town/County Policies, Guidelines &amp; Standards</b>	<b>District Policies, Guidelines &amp; Standards</b>	<b>Other Policies, Guidelines &amp; Standards</b>	<b>Noted Gaps &amp; Obstacles</b>	<b>Possible outcomes of Collaborative</b>
<p><b>44. Loss of Recharge</b></p> <p>Loss of natural recharge and increased concentration of pollutants in runoff resulting from increased impervious surface due to new development</p>	<p>WAP Ch. 4: Better Designs for Buildings, Streets &amp; Drainage</p>	<p>Implementation of C.3 requirements for new development and redevelopment</p>	<p>Preparation of HMP to support implementation of Provision C.3.f</p>		<p>Need to evaluate potential impacts of imperviousness on recharge.</p>	<p>Collaborative Goal: Groundwater Quantity</p>
<p><b>45. Nutrients and pesticides in groundwater</b></p> <p>Nutrients and pesticides used in agriculture and on golf courses infiltrate into groundwater.</p>			<p>District implements irrigation and nutrient management programs</p>			<p>Promote an expanded irrigation and chemical management program</p> <p>Collaborative Goal: <i>Groundwater Quality</i></p>