

October 18, 2018

Public Comment
Pescadero-Butano Sediment TMDL
Deadline: 10/18/18 by 12 noon

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812



Dear Ms. Townsend:

Re: Comment Letter – Pescadero-Butano Watershed Sediment TMDL

The County of San Mateo (County) Department of Public Works (Department) appreciates the opportunity to comment on the proposed approval of the San Francisco Bay Regional Water Quality Control Board's (Regional Board) amendment to the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) to establish a total maximum daily load (TMDL) for sediment in the Pescadero-Butano watershed and an implementation plan to achieve the TMDL and related habitat enhancement goals. The Department acknowledges and appreciates the large effort required by the Regional Board to develop this TMDL and supports the overall goals and objectives of the TMDL to improve sediment and habitat conditions in the Pescadero-Butano Watershed.

Prior to adoption of the Basin Plan amendment by the Regional Board on June 13, 2018, the County submitted in a timely manner detailed comments. While the Department feels that several of the County's comments were not adequately addressed (i.e., technical components of the analysis, development of a more complete sediment budget, re-evaluating numeric targets), we remain supportive and wish to highlight that the goals and objectives of the TMDL are consistent and well-aligned with the County's current development of a Routine Maintenance Program (Maintenance Program).

The Department maintains creek crossings, culverts, roads, and other drainage related facilities in the Pescadero-Butano watershed, and the County's Parks Department manages Memorial, Sam McDonald, and Pescadero Creek Parks. The County recently updated its Manual for routine maintenance specifically for the Maintenance Program that describes routine maintenance activities and clearly defines standards, conservation outcomes, impact and avoidance measures, best management practices (BMPs), and mitigation options. The Maintenance Program is designed to avoid and minimize impacts to water quality, sensitive species and habitat, and native vegetation during maintenance activities and aligns directly with the TMDL goals by maintaining or restoring the storage, delivery and routing of surface runoff; controlling erosion, sediment mobilization, and debris; revegetating disturbed areas; and preserving large woody materials for use in bank stabilization or habitat restoration activities. The Maintenance Program will reduce road-related sedimentation and help meet



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the TMDL sediment reduction targets by properly maintaining and sizing roadway culverts; installing energy dissipation structures for drainage outlets; addressing deteriorated culverts and conducting biostabilization based slip-outs and bank repairs in a timely manner; and providing regular trainings for County staff. Our approach to mitigation includes a suite of options (i.e., On-Site Mitigation when available, Off-Site Mitigation, Conservation Areas, and Partnering with Local Watershed Organizations), several of which will help meet TMDL objectives in the Pescadero-Butano watershed, as well as future San Gregorio watershed objectives. For example, off-site mitigation will likely include sediment reduction projects at logging-related creek crossings and haul roads within the Pescadero Park complex. A conservation area is proposed on County-owned property in the Butano Creek watershed.

The County will also continue to collaborate and partner with local organizations, such as the San Mateo Resource Conservation District (RCD), to support smaller-scale habitat restoration and watershed improvement projects including those identified through existing RCD-led programs such as the Integrated Watershed Restoration Program and the Rural Roads Program.

The County is currently seeking programmatic authorizations for the Maintenance Program from the Regional Board and other regulatory agencies. We recognize this opportunity to align our Maintenance Program objectives and approaches with the needs and strategies of the TMDL, and we look forward to working with the Regional Board collaboratively on this process. With this letter, we request that the State Board support us in working with the Regional Board to expedite authorization of the County's Maintenance Program as a mechanism to achieve TMDL goals, provide funding assistance, and closely collaborate with other resource agencies on streamlined approval for mitigation and voluntary restoration projects aimed at sediment reduction in the Pescadero-Butano watershed. The sooner the County is granted authorization for the Maintenance Program, the sooner the County can begin supporting many of the goals of the TMDL.

We recommend that the State Board closely review our past comments and the Regional Board's response to comments on the Pescadero-Butano Watershed Sediment TMDL and use those comments to guide development of the upcoming sediment TMDL for the San Gregorio Creek watershed. The Department recommends early and continued involvement with County staff throughout the source analysis and TMDL development process.

The County is dedicated to continuing to work in the Pescadero-Butano watershed to improve watershed and ecological health. Achieving the goals of the TMDL will require collaboration, coordination, and partnership amongst many agencies. The County hopes that the Regional and State Water Boards can facilitate coordination with other agencies and will

Ms. Jeanine Townsend
State Water Resources Control Board
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continue to maintain open lines of communication with the County providing reasonable and adaptive guidance and setting clear expectations that are feasible and focused on implementation.

Very truly yours,



James C. Porter, P.E.
Director of Public Works

JCP:AMS:MC:JC

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- cc: Setenay Bozkurt-Frucht, San Francisco Bay Regional Water Quality Control Board
Don Horsley, San Mateo County Board of Supervisors, District 3
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- bcc: Ann M. Stillman, P.E., Deputy Director, Engineering and Resource Protection
Joseph Lo Coco, P.E., Deputy Director, Roads Services
Julie Casagrande, Watershed Protection Specialist, Utilities-Flood Control-Watershed
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