

**PROPOSED ORDER R3-2026-0004, WASTE DISCHARGE REQUIREMENTS FOR
THE CITY OF EL PASO DE ROBLES ANNUAL FLOOD CONTROL AND FIRE FUEL
LOAD REDUCTION PROJECT**

PUBLIC COMMENTS

The Central Coast Water Board publicly noticed the Proposed Order for a 33-day public comment period from January 16, 2026, through February 18, 2026, and received one comment letter from the City of El Paso de Robles. A direct transcription of the comment letter is below. The transcription does not include the entire content of the comment letter as some content is non-substantive (e.g., salutations, contact information).¹

City of El Paso de Robles – February 17, 2026 Letter

The City of El Paso de Robles respectfully submits this letter in support of Tentative Order R3-2026-0004, proposed by the Central Coast Regional Water Quality Control Board to renew Waste Discharge Requirements (WDRs) for the Annual Flood Control and Fire Fuel Load Reduction Project.

These recurring activities are critical to protecting public safety, reducing municipal liability, and maintaining flood conveyance capacity within the Salinas River. Without routine sediment removal and vegetation management, channels constrict, flows are diverted, and the risk of bank failure, infrastructure damage, and localized flooding increases substantially. Proactive maintenance reduces the potential for uncontrolled releases of sediment and debris during storm events and helps preserve downstream water quality and beneficial uses.

In addition to flood risk, the Salinas River corridor is home to a very dense and diverse vegetation that create continuous fuel loads immediately adjacent to residences, businesses, critical transportation routes, and vital utilities. If left unmanaged, a single ignition could spread rapidly through the riparian system with devastating consequences for life, property, habitat, and water quality. Catastrophic wildfire can remove stabilizing vegetation; generate significant ash and pollutant deposition, and lead to extreme erosion and sediment delivery during subsequent storm events. Strategic fuel load reduction, performed with appropriate environmental protections, is therefore an important tool for preventing far greater impacts to the watershed.

Over the past five years, the City has demonstrated that this work can be implemented successfully and responsibly under the previous Order. Through targeted vegetation management, prescribed grazing within the Salinas River corridor, removal of trash and debris, and deployment of hand crews citywide, the City has reduced fire fuel continuity, improved flood conveyance, and minimized disturbance while maintaining protection of water quality and habitat.

¹ Contact Central Coast Water Board staff to request a copy of the entire comment letter.

This measurable progress is reflected in documented wildfire outcomes within the river corridor. In 2019 and 2020, approximately 50 acres burned under heavy fuel loading and high fire intensity, permanently impacting an estimated 30 acres of riparian canopy. From 2021 through 2025, following implementation of enhanced vegetation management practices, approximately 20 acres burned at significantly lower intensity with minimal canopy loss.

These results demonstrate that vegetation management within the Salinas River corridor not only reduces community wildfire risk but also protects and preserves riparian habitat. The City's performance under the previous five-year Order provides clear evidence that these activities can continue to be carried out responsibly, effectively, and in a manner that meets regulatory expectations while protecting water quality and environmental resources.

Tentative Order R3-2026-0004 strikes an appropriate balance between environmental protection and operational feasibility for routine maintenance and vegetation management. The Order establishes a clear regulatory framework, provides the City with implementation certainty, and incorporates monitoring and adaptive management to ensure protection of water quality and beneficial uses. The proposed WDR Order is consistent with the City's ongoing efforts to mitigate flood and wildfire risk and maintains continuity with prior WDR conditions that have allowed the City to conduct vegetation management safely while protecting habitat and water quality.

We value the partnership with Regional Board staff and the collaborative approach taken in developing this Order. Adoption of Tentative Order R3-2026-0004 will allow the City to continue essential flood control and fire risk reduction work in a manner that is both environmentally responsible and protective of our residents.