

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Setenay Bozkurt Frucht)
MEETING DATE: June 13, 2018

ITEM: 6

SUBJECT: **Proposed Amendment to the Water Quality Control Plan (Basin Plan) for the San Francisco Bay Region to Establish a Total Maximum Daily Load (TMDL) for Sediment in the Pescadero-Butano Watershed and an Implementation Plan to Achieve the TMDL and Habitat Enhancement Goals –**
Hearing to Consider Adoption of Proposed Basin Plan Amendment

CHRONOLOGY: There has been no previous action by the Board on this matter.

DISCUSSION: The attached Tentative Resolution (Appendix A) and proposed Basin Plan Amendment (Appendix B) would amend the Basin Plan to incorporate a TMDL and implementation plan to control delivery of fine sediment and enhance habitat in the Pescadero-Butano Creek watershed.

Pescadero and Butano creeks drain a large watershed along coastal San Mateo County. The creeks in the watershed provide important habitat for steelhead trout and Coho salmon. Impairment due to excess fine sediment in channels, channel simplification, and elimination of floodplain sediment storage has resulted in steelhead and salmon population declines. Besides sediment impairment, the most significant cause contributing to declining salmonid populations is channel incision. Channel incision reduces the frequency of gravel bars and pools, side channels, and alcoves and results in disconnection of the channel from its floodplain.

The proposed Basin Plan amendment would establish the following:

- A sediment TMDL equal to 125 percent of natural background sediment load;
- Numeric targets for sediment, expressed as residual pool volume and substrate composition;
- Numeric targets for habitat condition, expressed as the amount of large woody debris in channels;
- Allocations for all significant sediment source categories;
- An implementation plan to achieve the TMDL and related habitat enhancement goals; and
- A plan and schedule for monitoring and evaluating progress toward meeting the targets.

The Basin Plan amendment would require implementing parties to take actions to address sources of sediment in the watershed, including parks and open space, county roads, and agricultural, grazing, and timberlands. The most important source of sediment in the watershed is road-related erosion. As with other sediment TMDLs the

Board has approved, the implementation plan includes recommended, not required, habitat enhancement actions to improve aquatic habitat for endangered species.

The TMDL aims to increase channel complexity, increase channel connections to floodplains, and increase fine sediment storage. Achievement of these goals would help improve resiliency in the watershed to climate change.

Pescadero marsh at the bottom of the watershed is a separate water body in the Basin Plan. Implementation actions identified in the TMDL will contribute to water quality improvement in the marsh; however, a separate project to evaluate and address water quality in the marsh-lagoon complex is underway and will be continued, working collaboratively with stakeholders.

Additional documentation in this package includes the Staff Report (Appendix C), Responses to Comments (Appendix D), and copies of the scientific peer reviews and all written comments (Appendix E).

Comments from Stakeholders and Staff Responses

During the public comment period, we received twelve comment letters. The California Department of Fish and Wildlife (CDFW), National Marine Fisheries Service (NMFS), Trout Unlimited, and CalTrout were supportive of the goals of the TMDL. They asked clarifying questions about the scientific basis of the impairment and disagreed with some statements made in the Draft Staff Report about the condition of the marsh and lagoon and their hydrodynamics. We address their comments, explaining the relationship between sedimentation and water quality and providing additional details about our understanding about the marsh/lagoon hydrodynamics and tidal prism. All comment letters underscored the need to coordinate and consult with NMFS and CDFW as we address water quality in the marsh and lagoon.

Several Commenters identified the need to establish acreage thresholds or raised concerns about small operations bearing the cost and responsibilities of TMDL implementation. These Commenters include the San Mateo County Farm Bureau, the Resource Conservation District, Big Creek Lumber Company, and Redwood Empire (the last two are both timberland owners). In response, we reevaluated parcel size and attainment of the TMDL and propose thresholds for agriculture (5 acres), grazing (50 acres) and timberlands (100 acres). In addition, the Commenters asked about the process for implementing the TMDL and its timeframe. To clarify the process, we identify a three-year planning and prioritizing phase that allows these implementing parties to evaluate property-specific sources of sediment and propose erosion control actions and an implementation schedule, subject to Executive Officer approval. The TMDL requires coverage under general or individual waste discharge requirements (WDRs) or waivers of WDRs for dischargers, if necessary.

San Mateo County (County) raised a number of issues about the elements of the TMDL, and the Midpeninsula Open Space District provided comments about the proposed numeric targets; we addressed all these comments in detail. The County and other Commenters, e.g., Peninsula Open Space Trust, highlighted issues related to mitigation requirements and the complexity of permitting (costs and limited work

windows) given the various endangered species in the watershed, especially the marbled murrelet. We understand the difficulties in completing projects in the watershed given the limited work windows and will work to coordinate agencies with overlapping jurisdictions. We have models for coordinating efforts in other watersheds, e.g., the Lagunitas watershed, that may apply here. The TMDL provides for a twenty-year implementation time frame to complete necessary road-related actions; we anticipate that there will be adequate time to prioritize and budget for necessary implementation actions

We made a number of revisions, clarifying changes, and minor corrections to the Staff Report and the proposed Basin Plan amendment in response to the comments received. In addition, we made some staff initiated changes to provide clarity.

RECOMMEN- Adoption of the Tentative Resolution.
DATION

APPENDICES: A. Tentative Resolution with Exhibit A, Proposed Basin Plan Amendment
B. Revised Proposed Basin Plan Amendment showing changes made since initial circulation
C. Staff Report – showing changes made in response to comments received
Available electronically at:
https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/pescaderobutanocrkstmdl.html
D. Responses to Comments
E. Comment Letters
Available electronically at:
https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/pescaderobutanocrkstmdl.html