



February 12, 2013

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000  
VIA Email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



**Re: Comment Letter – Pacifica Bacteria TMDL**

Dear Ms. Townsend:

Thank you for the opportunity to comment on the proposed approval of an amendment to the Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) to establish a Total Maximum Daily Load for Bacteria at San Pedro Creek and at Pacifica State Beach.

The San Mateo County Resource Conservation District (RCD), a division of the State established under Division 9 of the Public Resources Code, submits comments related to the final version of the Basin Plan that addresses confined animal facilities located within the watershed of San Pedro Creek and Pacifica State Beach. These comments were not prepared in time to submit to the San Francisco Bay Regional Water Quality Control Board due to the absence of a key staff person who was on maternity leave.

In support of the efforts of many to improve and protect water quality in Pacifica, we want to apprise you of services offered by the RCD to work with livestock facilities, including equestrian operations, to voluntarily improve their property and operations to reduce runoff of sediment, nutrients and pathogens into surface waters. Over many years the RCD has secured funding through grant programs of the State Water Resources Control Board, the Regional Water Quality Control Board, the EPA, the Farm Bill, and more to provide conservation technical assistance to landowners, cost-share for implementation of Best Management Practices, and educational workshops.

We are currently partnering with the USDA Natural Resources Conservation Service, Ecology Action of Santa Cruz, and San Mateo County to implement two Proposition 84 ASBS grants through the State Water Resources Control Board to provide assistance to confined animal operations in watersheds that drain into the Fitzgerald Area of Special Biological Significance (ASBS). With a recent Proposition 50 grant through the Regional Water Quality Control Board, we were able to work with an equestrian facility in the San Pedro watershed to develop a plan for improved manure management and implement the improvements.

With nearly 75 years of experience bringing information, education, and technical assistance to landowners and land managers in San Mateo County, we have found that our approach to voluntary conservation can significantly reduce polluted runoff from such facilities. We encourage you to consider such an approach to assist in achieving the desired total maximum daily loads, and to utilize the RCD as a resource to property owners and operators.

Please let me know if I can provide any additional information about the RCD or our programs.

Sincerely,

A handwritten signature in black ink that reads "Kellyx Nelson". The signature is written in a cursive, flowing style.

Kellyx Nelson  
Executive Director

Cc: Farhad Ghodrati  
Environmental Scientist  
California Regional Water Quality Control Board  
San Francisco Bay Region

Cc: Stephen A. Rhodes  
City Manager, City of Pacifica

