

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

STAFF SUMMARY REPORT: René Leclerc  
MEETING DATE: October 12, 2021

**ITEM: 6**

**Resolution to Support a Water Quality Improvement Plan to Address the San Gregorio Creek Sediment Impairment – Hearing to Consider Adoption of a Tentative Resolution**

**CHRONOLOGY:**

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

**DISCUSSION:**

This Item proposes a Water Quality Improvement Plan (Plan) to address the sediment impairment in San Gregorio Creek, located in coastal San Mateo County. The Tentative Resolution is in Appendix A and the Staff Report, which contains the Plan, is in Appendix B. By adopting the Tentative Resolution, the Board would accept this Plan to resolve the impairment of San Gregorio Creek by excessive sedimentation. The Plan was circulated for public comment; Appendix C contains the comment letters we received, and Appendix D contains our responses.

San Gregorio Creek (Creek) was placed on the State's 303(d) list of impaired water bodies in 1998, based on the loss of steelhead trout (*Oncorhynchus mykiss*) habitat due to excessive sedimentation in the Creek. Such a listing commonly leads to development of a Total Maximum Daily Load (TMDL). However, the U.S. EPA's "Long-Term Vision for Assessment, Restoration, and Protection under the Clean Water Act Section 303(d) Program" allows states flexibility in addressing water quality impairments. Rather than completing a TMDL for the Creek, we have developed a Water Quality Improvement Plan (Plan), based largely on actions taken or planned in the watershed. Given the level of stakeholder action and cooperation and our ability to rely on existing regulatory authorities, this alternative approach more appropriately addresses the impairment to the Creek. This approach does not remove our obligation to develop a TMDL if implementation of the Plan is unsuccessful at addressing the impairment.

The Plan's main goal is to facilitate the recovery of listed populations of coho salmon (*Oncorhynchus kisutch*) and steelhead in the San Gregorio Creek watershed. The Plan identifies significant sources of sediment within the watershed and proposes implementation actions and mechanisms for implementation to achieve water quality objectives for sediment and habitat conditions in San Gregorio Creek. Implementation actions to reduce sediment loading focus on roads and trails, and on agricultural lands. Recommended actions to improve aquatic habitat for listed species focus on increasing channel complexity by restoring floodplain connectivity, increasing large woody debris volumes, increasing base flow in the Creek, removing barriers to fish passage, and reducing human disturbance in the San Gregorio Creek lagoon. The Plan also includes water quality monitoring to evaluate effectiveness of the corrective actions and assess attainment of standards.

Staff engaged local stakeholders throughout the development of the Plan, and stakeholder input was instrumental in developing implementation actions for the Plan. The proposed Plan represents a reasonable and flexible approach to protect water quality in the San Gregorio Creek watershed in an efficient and effective manner, identifies feasible implementation actions, and provides the Board and our stakeholders with opportunities for adaptive implementation, as needed.

We received three comments letters during the public comment period. All were supportive of the Plan's overall goals and objectives. However, two of the letters also expressed concerns or recommendations.

The National Marine Fisheries Service (NMFS) noted that many of the Plan's implementation actions were very similar to recovery actions identified in NMFS recovery plans for salmonids in the California Central Coast region. NMFS requested that references to their recovery plans be added to relevant sections of the WQIP for completeness. We accommodated this request.

The Peninsula Open Space Trust outlined its ongoing efforts to manage sediment on roads and working lands as well as efforts to improve instream habitat conditions in the San Gregorio Creek watershed. They appreciate the Implementation Plan's flexibility afforded to landowners in developing their own plans for sediment reduction but expressed concern over the potential fiscal burden imposed on landowners and recommended identifying new funding sources to help landowners with management plan development.

San Mateo County commented that the goals and objectives of the Plan are aligned with ongoing County activities to manage sediment and habitat in the San Gregorio Creek watershed. The County also expressed several concerns about the Plan, focused on the geomorphic and sediment source investigations, the breadth and scope of the Implementation Plan, and the lack of new funding to support Plan actions. We address each of their comments in our Response to Comments but made no further changes to the Staff Report.

#### **RECOMMENDATION:**

Adopt the Tentative Resolution

#### **APPENDICES:**

- A. Tentative Resolution
- B. Staff Report and Attachments
- C. Comment Letters Received
- D. Response to Comments

Appendix A  
Tentative Resolution

Appendix B  
Staff Report and Attachments

# Attachment 1

## San Gregorio Creek Watershed Management Plan

An electronic version of the Watershed Management Plan has not been posted online as it does not meet specified accessibility standards. For an electronic copy of the Watershed Management Plan, please contact René Leclerc via email to [Rene.Leclerc@waterboards.ca.gov](mailto:Rene.Leclerc@waterboards.ca.gov) or at (510) 622-2410.

Attachment 2  
Detailed Problem Statement

Attachment 3  
San Gregorio Creek Watershed  
Rapid Sediment Budget

# Appendix C

## Comment Letters Received

An electronic version of the comment letters has not been posted online, as the letters do not meet specified accessibility standards. For an electronic copy of the comments, please contact René Leclerc via email to [Rene.Leclerc@waterboards.ca.gov](mailto:Rene.Leclerc@waterboards.ca.gov) or at (510) 622-2410.



Appendix D  
Response to Comments