

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



June 29, 2015

Michael Schaller
County of San Mateo – Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063-1665

Mark Chow, P.E., Principal Engineer
County of San Mateo – Department Of Public Works
455 County Center, 5th Floor
Redwood City, CA 94063-1665

RE: Initial Study/Mitigated Negative Declaration Butano Creek at Pescadero Creek Road
Sediment Removal Project

Dear Mr. Schaller and Mr. Chow:

Thank you for providing us with the opportunity to comment on the May 2015 Initial Study/Mitigated Negative Declaration prepared by Horizon Water and Environment for the County of San Mateo's proposed Butano Creek sediment removal project at Pescadero Creek Road in Pescadero. The proposed project involves the removal of approximately 1,445 cubic yards of sediment from 100 linear feet of the Butano Creek channel under the Pescadero Creek Road Bridge. Project sediment removal would extend from 30 feet up-stream from the up-stream face of the bridge to approximately 40 feet downstream of the downstream face of the bridge. The proposed project also includes the disposal of the dredged sediment at either of two locations within the Coastal Zone in proximity to Butano Creek Bridge. Our comments are provided below.

Jurisdiction

The proposed project comprises elements that include: 1) a possible disposal site located to the north and east of the bridge, on 0.6-acre area of land on private property (that is used for agriculture); 2) a possible disposal site on County-owned property (a former airstrip) located southwesterly of the bridge; 4) a staging location on 2.38 acres of County-owned property off of Bean Hollow Road; and 5) the removal of sediment from within the channel bed of Butano Creek. All elements of the proposed project would occur within the Coastal Zone and are under the permit jurisdiction of San Mateo County. The proposed sediment removal and associated project activities would be conducted within 100 feet of the stream (Butano Creek) thus the project is appealable to the Coastal Commission.

Project Description

The discussion of potential impacts to dusky-footed woodrat further states that "bridge rehabilitation" would result in direct mortality of woodrat. Please clarify and describe what bridge work would be involved with the proposed project as this is not included in the project description.

Michael Schaller, Project Planner
Mark Chow, P.E. Principal Engineer
IS/ND - Butano Creek at Pescadero Road
Sediment Removal Project
June 29, 2015

Coordination efforts between regulatory agencies have been conducted for the development of plans to improve the health of the aquatic ecosystem of Pescadero Marsh. There has been collaboration between various entities, including the Army Corps of Engineers and NOAA among others, to develop an integrated solution to the flooding at the proposed project location. Efforts are under consideration for the restoration of Butano Creek to its historic floodplain at the Butano Farms property owned by POST in Pescadero. The proposed project is a near-term solution to the flooding at the Butano Creek Bridge. The IS/MND needs to include a discussion of potential impacts the proposed project could have downstream of the bridge location. How would removal of the sediment affect downstream conditions at Pescadero Marsh and Pescadero State Beach? Potential long-term solutions to the flooding are identified in Appendix E of the Biological Assessment (prepared by H. T. Harvey and Associates). These include upland sediment control activities to reduce the amount of sediment delivered to the site, restoration/reconnection of floodplains to absorb sediment and flood water energy; creation of additional flow capacity at the road either through construction of a causeway and or dredging the channel; and restoration or creation of a stable open channel. The IS/MND should better describe or discuss how the proposed project fits in with the potential long-term solution. Will some amount of sediment removal still be necessary in the long-term, as mentioned above with the solution that would entail creation of additional flow capacity?

The proposed project also includes an annual maintenance plan for the sediment removal over the next five years. According to the IS/MND a work plan for proposed maintenance activities and a report following completion of annual activities documenting work for that year will be prepared by the County. We respectfully suggest that the Coastal Commission be included on the distribution list for the report as we have an interest in such activities and what is occurring in the Butano Creek and Pescadero Creek watersheds.

Biological Resources

The proposed project area contains sensitive habitat, as defined by the Local Coastal Program (LCP) Policy 7.1 and designated as such under LCP Policy 7.2 as the project area contains riparian corridors, wetlands and areas that contain or support the federally threatened Central California Coast Steelhead Trout (*Oncorhynchus mykiss*), federally and state-listed as endangered, Coho Salmon (*Oncorhynchus kisutch*), federally-listed as threatened and state species of special concern, California red-legged frog (CRLF), the federal and state endangered San Francisco Garter Snake (SFGS), San Francisco Dusky-Footed Woodrat, a state species of special concern, and Western pond turtle (*Emys marmorata*) a state species of special concern.

LCP Policy 7.3 prohibits any development or land use which would have a significant adverse impact on sensitive habitat areas and LCP Policy 7.4 limits uses to resource dependent uses as further identified for specific habitat types in LCP Policies 7.9, 7.16, 7.23, 7.26, 7.30, 7.33, and 7.44. Only project activities consistent with those listed in LCP Policy 7.4 shall be allowed in the corresponding sensitive habitat areas. In addition, the proposed project should include mitigation measures to avoid and or minimize impacts to sensitive species and habitats and comply with U.S. Fish and Wildlife and State Department of Fish and Game regulations consistent with the requirements of LCP Policies 7.3 and 7.5. The proposed project should also comply with the more

Michael Schaller, Project Planner
Mark Chow, P.E. Principal Engineer
IS/ND - Butano Creek at Pescadero Road
Sediment Removal Project
June 29, 2015

specific requirements for wetlands (LCP Policies 7.14-7.21), riparian corridors (LCP Policies 7.7-7.13) and rare and endangered species habitats (LCP Policies 7.32-7.42) outlined in the LCP as applicable.

Mitigation

The wetland delineation conducted by H. T. Harvey and Associates, dated March 2015 indicates a total of 1.17 acres of wetlands as defined by the Coastal Commission. The IS/MND states that the sediment removal element of the proposed project would result in 0.11 acre of “temporary impacts” to riparian habitat; and as mitigation for such impacts proposes a mitigation ratio of 1:1. The environmental document also indicates that 0.13 acre of jurisdictional waters would be affected by the proposed project, further stating on page 3-28 a total of 0.24 acre jurisdictional wetland impacts. Page 3-23 indicates a total of 0.28 acre of wetland impacts. Coastal Commission defines temporary impacts as impacts that don’t involve vegetation removal or ground disturbance. Mitigation Measure BIO-6 requires a Riparian Mitigation Plan for the creation of riparian habitat. The removal of vegetation and or ground disturbance in a defined wetland is considered a permanent impact. We suggest that the riparian mitigation plan require a higher mitigation ratio, such as 3:1, for permanent impacts to the riparian habitat and 4:1 for permanent impacts to wetlands.

The document states that there is an “unknown 10-inch dbh assumed to be native species” tree. Please clarify whether or not this can be better identified in order to appropriately mitigate for its removal.

Mitigation Measure BIO-2 requires the preservation and management of 0.56-acre area off-site as permanent conservation land for California red-legged frog and San Francisco garter snake; and to compensate for all impacts to wetland, aquatic, and riparian habitat. The County proposes to prepare and implement a “Habitat Management and Monitoring Plan” for the conservation easement. According to the IS/MND the County will begin implementing the HMMP within 90 days of U. S. Fish and Wildlife Service’s and California Department of Fish and Wildlife approval. We suggest that the California Coastal Commission also be included as a reviewer for the subject HMMP as the sediment removal will be conducted in the Coastal Zone, within 100 feet of the stream channel in an area that is appealable to the Commission.

Traffic

LCP Public Works policies (2.48, 2.49, and 2.57) regulate road capacity, desired level of service, and protect road capacity for visitors in coastal areas. The primary road access to the coast in San Mateo County is via Highway 1. Studies show that the current volume of traffic on Highway 1 exceeds its capacity and that even with substantial investment in transit and highway improvements, congestion will only get worse in the future. This proposed project will temporarily generate additional traffic and will likely use Highway 1 during peak hours.

LCP policy 2.57 protects the public’s ability to access the coast, but the extreme traffic congestion on Highway 1 interferes with the public’s ability to access the area’s substantial public beaches and other visitor serving coastal resources. The transportation/traffic analysis in the IS/MND indicates that there will be a temporary increase in roadway traffic volumes on Highway 1 and Pescadero Creek Road during construction. The bicycle lane on Pescadero Creek Road would be out of

Michael Schaller, Project Planner
Mark Chow, P.E. Principal Engineer
IS/ND - Butano Creek at Pescadero Road
Sediment Removal Project
June 29, 2015

service and conflicts between bicycle and vehicular traffic could increase during construction. Construction is proposed to occur between June 1 and October 15, Monday – Friday 7:00 AM to 6:00 PM and 9:00 AM to 5:00 PM on Saturdays. The IS/MND Mitigation Measure TRA-1 requires preparation and implementation of a traffic control plan to reduce traffic impacts on Pescadero Creek Road and traffic safety hazards, and ensure adequate access for emergency responders, and construction vehicles. We suggest that the Traffic Control Plan also include specific mitigation measures to reduce and or avoid impacts to bicyclists. As there would be an increase in traffic on Highway 1 please provide/discuss measures that would be undertaken to address traffic impacts on Highway 1, which is used by the public to access the coast for recreational purposes during the summer months. We suggest that construction activities not be conducted during the weekends or on any holidays to the extent feasible.

Disposal

The proposal, as mentioned above, considers the disposal of the dredged material at either of two locations within the Coastal Zone. It would be put to beneficial re-use at the Curry site/property as a soil amendment to enhance crop production. The other option is to stockpile it on County-owned property and then dispose of it at a landfill or upland facility. We suggest that disposal be at an approved location consistent with LCP policies and in compliance with other waste discharge requirements.

I appreciate the opportunity to provide you with our comments. Please feel free to contact me via e-mail at rananda@coastal.ca.gov or call me at 415-904-5292 if you have questions or need clarification of these comments.

Sincerely,



Renée Ananda, Coastal Program Analyst
Coastal Commission
North Central Coast District