

Response to Comments

Proposed Order No. R1-2018-0011

Waiver of Waste Discharge Requirements and General Water Quality Certification for Road Management and Activities Conducted Under the Five Counties Salmonid Conservation Program in the North Coast Region

Background

On February 2, 2018, the Regional Water Board publicly noticed the draft *Waiver of Waste Discharge Requirements and General Water Quality Certification for Road Management and Activities Conducted Under the Five Counties Salmonid Conservation Program in the North Coast Region* (Order) and the Mitigated Negative Declaration (MND (SCH #2018012054)) prepared for the project. The 30-day comment period for the MND ended on March 5, 2018; the 45-day comment period for the draft Order ended on March 19, 2018. The Regional Water Board received no written comments for the MND, and one written comment for the draft Order during their respective public comment periods.

The comment received during the comment period is summarized below, followed by Regional Water Board staff response.

Comments received during the February 2 - March 19, 2018 Comment Period

Andrew Bundschuh,
Humboldt County Department of Public Works

March 19, 2018

Comment:

“[I]f culvert replacements on dry channels are considered Category A, then why not channel maintenance (i.e. sediment removal at inlet and outlet of culvert) on dry channels? I think there is a low chance of water quality impacts on any dry channel and going in and scooping out accumulated sediment at culvert inlets/outlets should be Category A. I mean, if you can go in and replace a culvert on a dry channel, which would likely include excavation at inlet and outlet, then why not the minimal work of just cleaning out the inlet and outlet and possibly some channel maintenance? Same with placing rock slope protection [sic] on dry channels...”

“Thinking the language should read ...

“Category A Project Activities

“5. *“The following activities are authorized on dry watercourses: Channel maintenance, including removal of accumulated sediment at culvert inlets/outlets, in-kind culvert replacements and/or replacement of rip-rap;”*”

Response:

Regional Water Board staff agree that the above activities, when conducted on dry watercourses and with implementation of the Best Management Practices contained within the 5C Roads Manual, pose a low risk to water quality. Item 5 in the list of Category A Activities (Attachment A) has been revised to include the proposed activities with minor changes in wording.