

Regional Water Quality Control Board SF Bay Region Proposed Basin Plan Amendment Pillar Point Harbor



Proposed Response

A Presentation for the Board of Harbor Commissioners
San Mateo County Harbor District

By

Jim Pruett, General Manager

November 18, 2020

San Francisco Bay Regional Water Quality Control Board

Notice of Filing

Proposed Amendment to the Water Quality Control Plan, San
Francisco Basin

Substitute Environmental Document (The Staff Report)



TMDL Problem Statement



Bacteria densities in the waters of the beaches in Pillar Point Harbor exceed the numeric water quality objectives for Enterococcus, which are types of bacteria that indicate the potential for fecal contamination and an elevated risk of pathogen-induced illness to people. Monitoring data show chronic exceedances of objectives for Enterococcus at multiple beach segments, which has led to health advisories and beach closures.

**Section 7.4.3.1
Proposed Basin Plan Amendment
October 13, 2020**

Proposed Basin Plan Amendment

**To Establish a Bacteria Total Maximum Daily Load (TMDL) and
Implementation Plan for Pillar Point Harbor and Venice Beach and to
Update the Bacteria Objectives for Protecting Water Contact
Recreation in the Basin Plan**

**Section 7.4.3.1
Proposed Basin Plan Amendment
October 13, 2020**





TMDL

Total Maximum Daily Limit



A TMDL specifies the maximum amount of a pollutant that a water body can receive and still meet water quality standards and allocates the acceptable pollutant load to point and nonpoint sources.

A TMDL is defined as the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources, and natural background, such that the capacity of the water body to assimilate pollutant loads (the loading capacity) is not exceeded.

Phase 1

Actions and Schedule for Vessels and Amenities in PPH



1. Begin or enhance “no dumping” education efforts to vessel owners
2. Evaluate effectiveness and proper performance of sewage collection systems (sewage dump stations, sewage pump out stations, sewer lines, etc.) for the harbor marina and harbor amenities
3. Inspect sewer and stormwater laterals and all other components connecting facilities at PPH to the sanitary sewer system.

Table 7.4.3-7
Proposed Basin Pan Amendment
October 13, 2020

Phase 1 (cont)

Actions and Schedule for Vessels and Amenities in PPH



4. **Prioritize sewer system/public restrooms repairs.**
5. **Establish/implement protocol to enhance efforts to identify and correct illicit sewage dumping from boats.**
6. **Begin/boost existing actions to control runoff from loading docks, dumpsters, food service and refuse areas.**
7. **Submit annual status reports describing implementation activities taken**

Table 7.4.3-7
Proposed Basin Plan Amendment
October 13, 2020

Phase 2

Actions and Schedule for Vessels and Amenities in PPH



Action

If Phase 1 actions are insufficient to meet the load allocations within 5 yrs:

Submit an enhanced plan describing actions being implemented and additional actions that will be implemented to reduce discharges of bacteria to the beaches.

Schedule

Within five years of the effective date of the TMDL

Harbor District's Primary Concerns

1. Source of bacteria is outside of the Harbor District's jurisdiction and control.
2. All beaches in Pillar Point Harbor are treated as one.
3. The Staff Report fails to reflect the past and current projects and initiatives.



Harbor District's Primary Concerns (Cont.)

4. Eight separate entities are being tasked to coordinate a regional response.
5. The inclusion of Pillar Point Harbor in the title of the Proposed Basin Plan Amendment and associated Staff Report: overbroad and prejudicial to all Harbor interests.






TMDL Watershed Area



Harbor District
Area of Responsibility

PPH

 Bacteria TMDL

Created by Demir Worthington 2019
Watersheds and Stream data from San Mateo Water District
Coordinate System: NAD 1983 UTM Zone 10N
Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, © OpenStreetMap contributors, and the GIS User Community

Figure 1-1
RWQCB Staff Report





Figure 2-1
RWQCB Staff Report



Pillar Point Marsh Beach

- **The 18-acre Pillar Point Marsh***
 - protected salt marsh
 - conveys runoff from HMB Airport, Pillar Ridge Mobile Home Park, and
 - several agricultural fields.

San Mateo County Parks and Recreation

Chapter 2.2.2
RWQCB Staff Report

* **Outside of the Harbor District's Jurisdiction**



Capistrano Beach

Denniston Creek Watershed

Majority is open space/Agricultural fields/Residential areas of El Granada.

Wildlife: Predominant source of fecal pollution

Chapter 2.2.2
RWQCB Staff Report

Chapter 2.5.3
RWQCB Staff Report



Capistrano Beach

Capistrano Catchment

15-acre catchment

Mostly impervious

Commercial businesses/parking lots

Dog feces originates in urban area.

Chapter 2.2.2
RWQCB Staff Report

Chapter 2.5.3
RWQCB Staff Report

Capistrano Beach



St. Augustine Creek (Montecito Ave Drainage):

- Open space;
- Enters a pipe at the upstream boundary of the urban area, less than half a mile from the harbor.
- The pipe receives stormwater runoff along its length.



Beach House Beach



The Deer Creek watershed

Natural bed and banks throughout most of its length

- Cattle*, deer and dog indicators where present,
- Cattle markers were present in both wet and dry season samples.
- Dog feces originated between the Harbor and the upper watershed in urban area.

Chapter 2.2.2
RWQCB Staff Report

Chapter 2.5.3
RWQCB Staff Report

* Bovine-associated markers are intended to detect bacterial contamination from cattle but can include deer, coyote or sheep.

© 2020 Google

Google Earth

Imagery Date: 5/10/2018 37°30'03.85" N 122°28'37.87" W elev 7 ft eye alt 2067 ft

1993



The District Has Already Completed/Proven

Based on several studies in PPH since 2008

- **Bacterial contamination was not widespread**
- **A high water exchange ratio has helped remove bacteria and other pollutants from the harbor.**
- **Fecal contamination from human sources was detected rarely.**
- **Live-aboard boats within the inner harbor have not been found to be a source of fecal contamination.**



The District Has Already Completed/Proven

Based on several studies in PPH since 2008

- **Dog-associated markers were detected frequently and were linked to freshwater creeks draining urban areas.**
- **Cattle and deer waste was detected at Deer Creek, while at Denniston Creek the predominant source was wildlife.**
- **The levels of Enterococcus in outfall samples consistently exceeded limits during dry and wet seasons.**

Identified Parties Required to Take Action

**Sewer Authority Mid-Coastside
California Parks and Recreation
City of Half Moon Bay
San Mateo County Harbor District
Granada Community Service District
San Mateo County
Caltrans
Browning-Ferris Industries**

**Table 7.4.3-3 through Table 7.4.3-13
Proposed Basin Pan Amendment
October 13, 2020**



JP1

Pillar Point Harbor



JP [2]1

The inclusion of Pillar Point Harbor in the title of the Proposed Basin Plan Amendment and associated Staff Report:

Overbroad and prejudicial to all Harbor interests.