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September 1, 2009

Mr. Sam Herzberg
San Mateo County Parks Department
455 Count Center, 4th Floor
Redwood City, CA 94063

RE: San Bruno Mountain Habitat Conservation Plan Amendment #5
Initial Study/Mitigated Negative Declaration Comments
CEA No. 08031

Dear Mr. Herzberg:

I have been retained by San Bruno Mountain Watch to review and prepare comments on the "San Bruno Mountain Habitat Conservation Plan Amendment #5 Initial Study/Mitigated Negative Declaration" dated August 2009 (2009 ND), with regard to stormwater and sediment impacts.

I am currently president of Carpenter Environmental Associates, Inc., (CEA) of Monroe, New York, an environmental science and engineering firm. I hold a Bachelor's degree in civil engineering, a Master's degree in environmental engineering, and a Ph.D. in environmental engineering, all from New York University. I am a registered professional engineer in New York, New Jersey, and Pennsylvania. I am Board Certified as an environmental engineer by the American Academy of Environmental Engineers. I have over 37 years of experience in environmental engineering with specialties in wastewater treatment, stormwater management, and water pollution. My experience includes the design and evaluation of stormwater management plans and facilities, preparation of Stormwater Pollution Prevention Plans, and evaluation of stormwater and sediment impacts from development. My experience also includes wastewater treatment plant design and water quality modeling. I was Professor of Environmental Engineering at The George Washington University where I taught courses in environmental engineering at the undergraduate and graduate levels and directed graduate and sponsored research.

In preparing these comments, in addition to the 2009 ND, I reviewed the "San Bruno Mountain Habitat Conservation Plan Amendment Environmental Assessment," October 2007 (2007 EA); the "Northeast Ridge Development of San Bruno Mountain Final EIR, December 1982"; the 1989 Amendment to the 1989 EIR, the Northeast Ridge Unit II EIR Addendum dated June 2007; and the "Brisbane Lagoon Sediment Study: Best Management Practices," May 5, 2005.

The 2009 ND asserts that the effects of the proposed development are *not significant* with regard to substantial erosion or siltation. The 2009 ND does not provide any additional mitigation measures for erosion or siltation beyond those provided in the previous 2007 EA. The 2007 EA relies exclusively on the findings in the 1982/1989 EIRs for the Northeast Ridge Developments and mitigation measures contained therein to arrive at a *not significant* finding with regard to substantial erosion or siltation. The mitigation measures relied upon in the 2007 EA from the 1982 EIR are listed as temporary catchment basins and sediment traps and the addition of tide gates at the Brisbane Lagoon. No new mitigation measures were added from the 1989 EIR (Table 4-1).

The 2009 ND maintains that the effects of the proposed development are *not significant* with regard to generating polluted or increased surface water runoff. The 2007 EA relies on the conclusions of the 1982/1989 EIRs for the Northeast Ridge Development and mitigation measures contained therein to arrive at a *not significant* finding with regard to rate or amount of surface runoff. No mitigation measures from the 1982 or 1989 EIRs are listed in the 2007 EA (Table 4-1).

The 2009 ND maintains that the effects of the proposed development are *not significant* with regard to the degradation of water quality. The 2007 EA also relies on the conclusions of the 1982/1989 EIRs for the Northeast Ridge Development and mitigation measures contained therein to arrive at a *not significant* finding with regard to degradation of water quality. No water quality mitigation measures from the 1982 or 1989 EIR are listed in the 2007 EA (Table 4-1).

Stormwater management has progressed greatly since the 1980s. The entire regulatory structure has changed with the advent of NPDES permits for stormwater discharges during construction. Today, there is a much greater understanding of the need to control pollution from stormwater, the rate and quantity of stormwater discharges, as well as a much greater understanding of means to do so.

The analyses done and the mitigation measures proposed in the documents I have reviewed are not sufficient to support a finding of no significant impacts on water quality from erosion and sediment transport and other pollutants found in stormwater from the proposed Northeast Ridge Development; particularly in light of the impacts on Brisbane Lagoon from previous construction on Northeast Ridge. The mitigation measures proposed do not include most of the standard best management practices (BMPs) contained in current Stormwater Pollution Prevention Plans (SWPPP). Mitigation measures such as construction staging, rapid stabilization of disturbed areas, use of erosion control blankets, drop inlet protection, and use of flocculants in sedimentation basins along with BMPs such as silt fencing and stabilized construction entrances, can reduce sediment and stormwater turbidity to low levels.

The lack of detailed analysis and the lack of mitigation measures contained in the 2009 ND and supporting documents do not support the 2009 ND's finding of no significant sediment stormwater, and water quality impacts.

Sincerely,
CARPENTER ENVIRONMENTAL
ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Bruce A. Bell". The signature is written in a cursive, flowing style.

Bruce A. Bell, Ph.D., P.E., BCEE
President