

Notice of Preparation

To: Responsible, Federal and Trustee Agencies From: County of San Mateo
(Agency)

(Address)

555 County Center, 5th Floor

Redwood City, CA 94063

Subject: **Notice of Preparation of a Draft Environmental Impact Report**

The County of San Mateo (County) is the lead agency preparing an environmental impact report (EIR) pursuant to the California Environmental Quality Act for the project identified below. The County would like input from your agency and interested members of the public on the scope and content of the environmental information to be included in the EIR.

The project description, location, and potential environmental effects are contained in the attached materials.

Because of the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Krzysztof Lisaj at the address above. Please include your name or the name of a contact person in your agency.

Project Title: County of San Mateo Routine Maintenance Program

Project Applicant, if any: n/a

Date: 1/4/19

Signature: _____

Title: _____

Telephone: _____

Email: _____

Senior Civil Engineer

(650) 599-1436

SMC_RMP_Comments@smcgov.org

Reference: Cal. Code Regs., tit. 14, (CEQA Guidelines) Sections 15082, subd. (a), 15103, 15375.



1. Introduction and Background

The County of San Mateo (County) Department of Public Works (DPW) and Parks Department (Parks) are both responsible for conducting routine maintenance activities to ensure that County facilities are properly functioning and operational. For the purposes of this document, these two departments are referred to collectively as “the County” or “the Departments” unless otherwise specified or described individually. DPW is responsible for maintaining over 300 miles of roadway and associated facilities including roadway shoulder areas, roadside ditches, ditch relief culverts, bridges, low impact development (LID)- based stormwater facilities, and flood control facilities in active flood control zones. DPW is also responsible for conducting vegetation management at two small municipal airports including the Half Moon Bay Airport and San Carlos Airport, and closed landfills including the Pescadero Landfill and Half Moon Bay Landfill. The Parks Department is responsible for maintaining various County park and recreational facilities, including trails and campgrounds.

To date, the County has developed, permitted, and conducted maintenance activities as individual discrete actions. In December 2018, the County completed the draft County of San Mateo Routine Maintenance Program (Maintenance Program) Manual, which describes the various routine maintenance activities conducted by DPW and Parks. The Manual provides a more comprehensive and consistent approach to conducting routine maintenance activities. The County is preparing an EIR to provide the public, responsible agencies, trustee agencies, and permitting agencies with information about the potential environmental effects associated with adoption and implementation of the Maintenance Program.

2. Project Location

The Program area location is shown in **Figure 1** within San Mateo County, California. The Program area consists of two physiographic regions: (1) County areas draining to San Francisco Bay (Bayside); and (2) County areas draining to the Pacific Ocean (Coastside). The County is divided by the Santa Cruz Mountains and these physiographic regions reflect the principal drainage patterns and directions. Within these two regions, routine maintenance areas in the County are mapped in more detail according to County maintained roads, trails, parks, and channels and stream courses. **Figures 2 through 6** provide additional sub-regional maps for the Bayside and Coastside maintenance areas.

3. Project Objectives

The objectives of the Maintenance Program include:

- Maintain the functional integrity and operational quality and capacity of County channels, stormwater facilities, roads, trails, and other recreational facilities.
- Prevent roadway flooding, reduce safety hazards, and minimize potential threats to the structural integrity of roadways, bridges, and stormwater and channel facilities within unincorporated San Mateo County.
- Repair and stabilize eroding streambanks and failing culverts in a timely manner to prevent larger-scale slope failures, avoid emergencies, and minimize sedimentation to downstream water bodies.
- Maintain County facilities and vegetation conditions for public safety purposes including, maintaining visibility, reducing fire risk, and reducing the potential for unauthorized encampments.
- Avoid and minimize potential impacts to the natural environment when conducting routine maintenance activities by incorporating detailed appraisals of habitat, species, and resource conditions while identifying and prioritizing maintenance needs and developing site-specific maintenance plans.
- Protect and enhance the natural environment at County facilities.
- Provide regulatory assurance to enable long-term permits with fewer delays and improved work planning and implementation.
- Develop mitigation approaches in a more strategic and integrative manner that targets areas in the County that could benefit from habitat enhancement, restoration, and/or preservation.

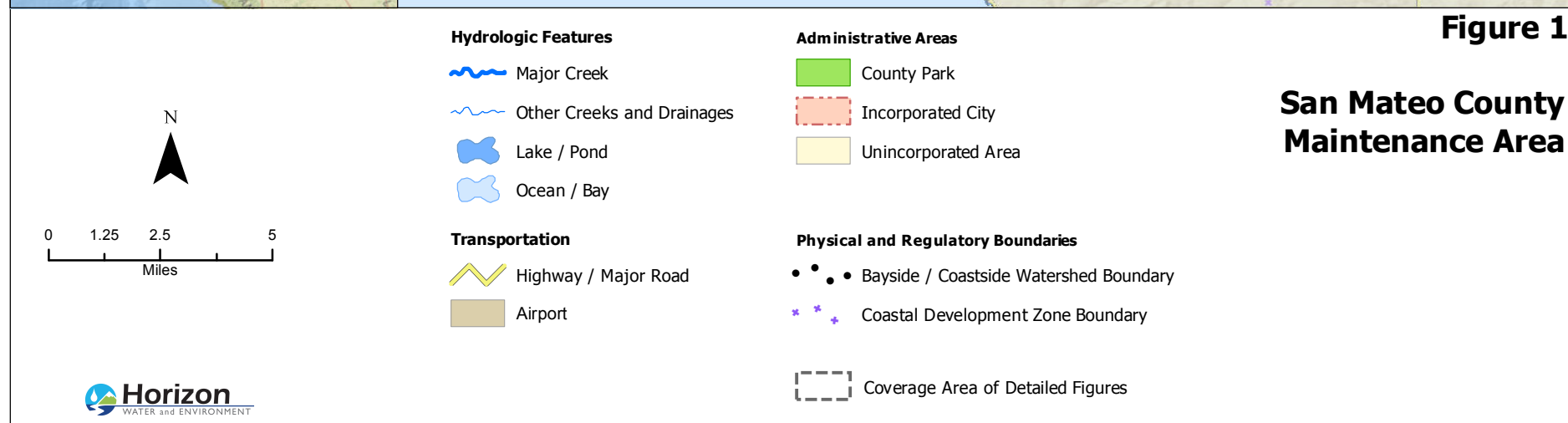
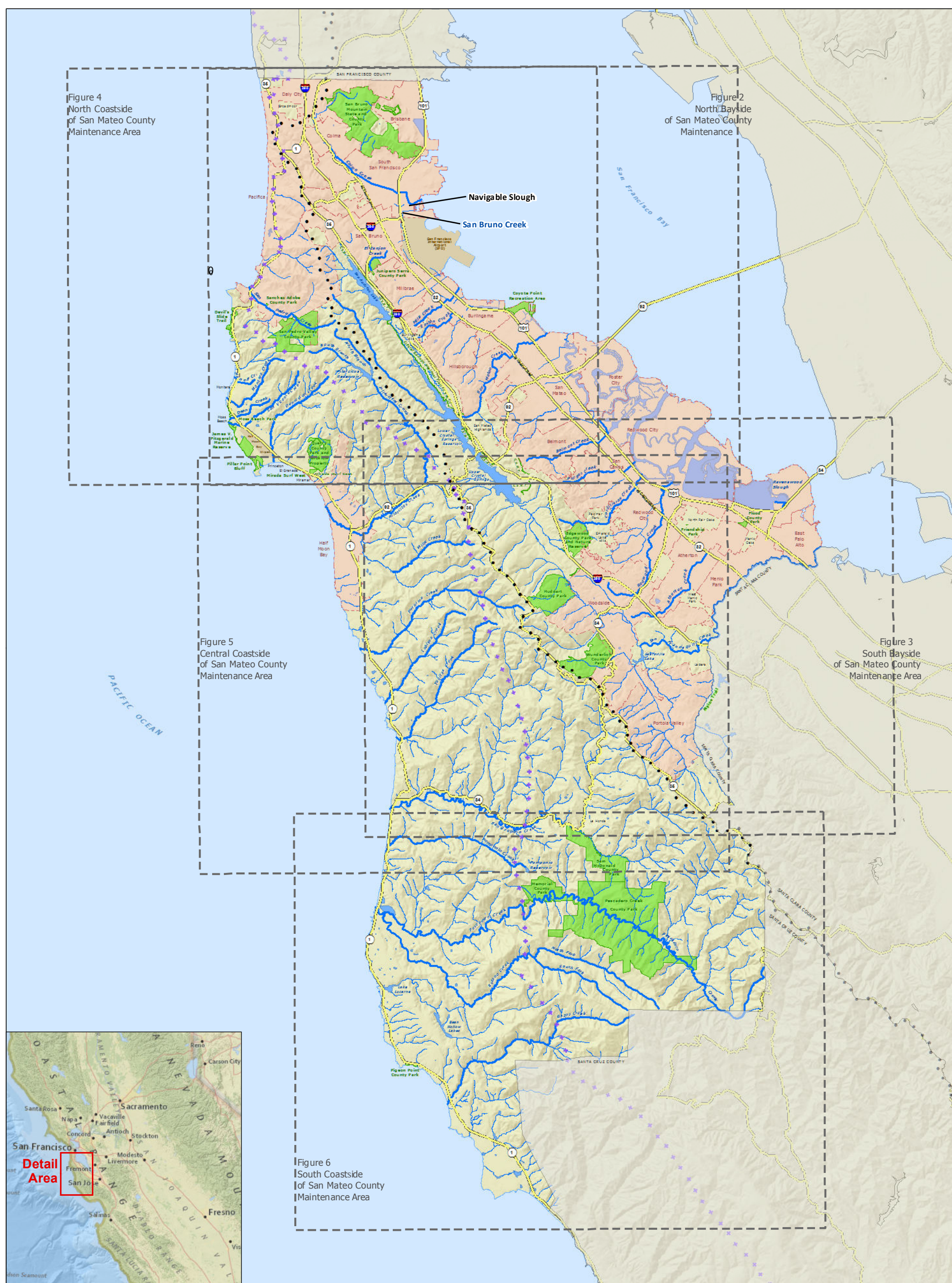




Figure 2

North Bayside of San Mateo County Maintenance Area

Hydrologic Features

- Major Creek
- Other Creeks and Drainages
- Lake / Pond
- Ocean / Bay

Administrative Areas

- County Park
- Colma Incorporated City
- Montara Unincorporated Area

Physical and Regulatory Boundaries

- Bayside / Coastsides Watershed Boundary
- Coastal Development Zone Boundary

Transportation

- Highway / Major Road
- Street
- Airport

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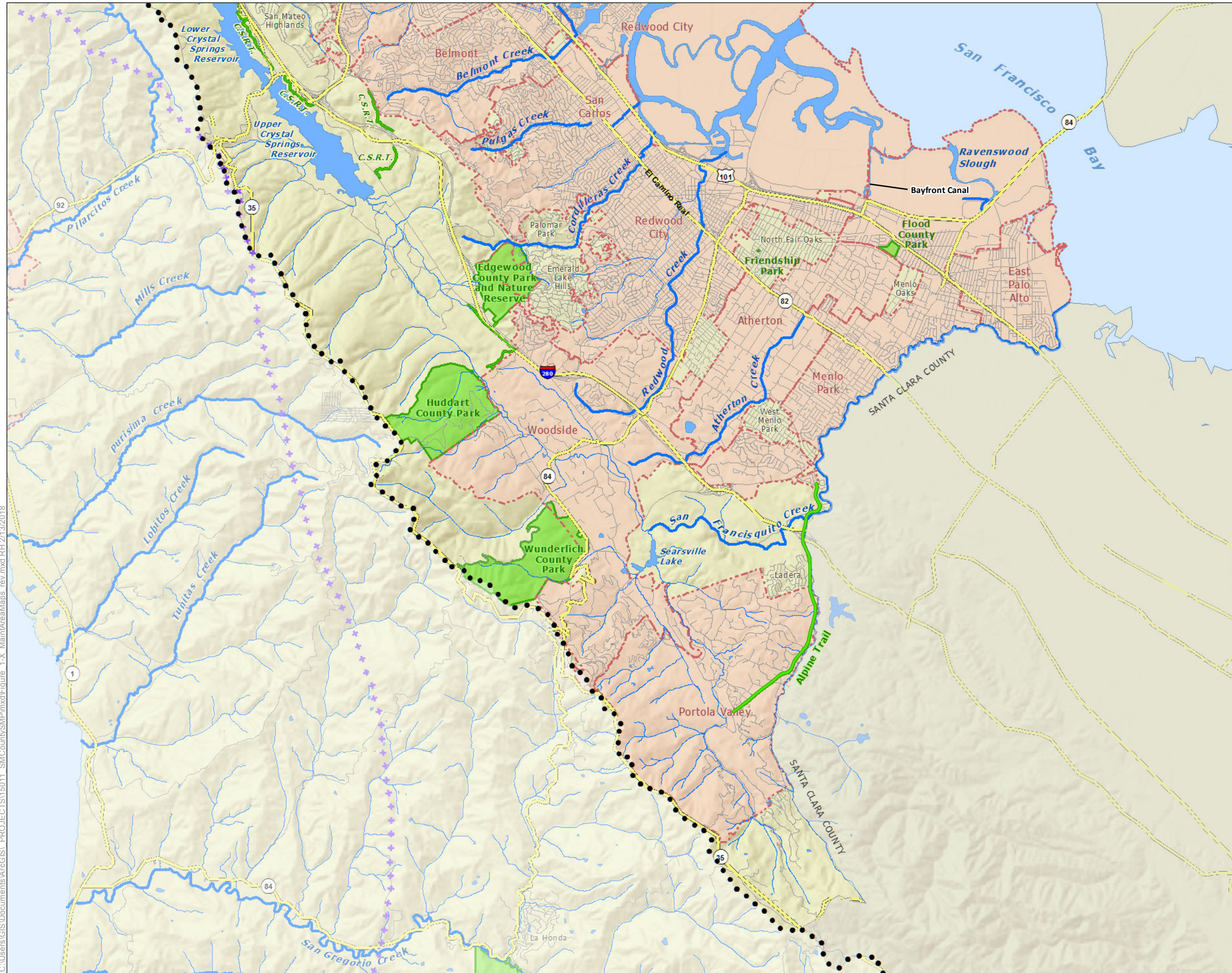


Figure 3

South Bayside of San Mateo County Maintenance Area

Hydrologic Features

- Major Creek
- Other Creeks and Drainages
- Lake / Pond
- Ocean / Bay

Administrative Areas

- County Park
- Colma Incorporated City
- Montara Unincorporated Area

Physical and Regulatory Boundaries

- Bayside / Coastsides Watershed Boundary
- Coastal Development Zone Boundary

Transportation

- Highway / Major Road
- Street
- Airport



0 1 2 4 Miles



Figure 4

North Coastside of San Mateo County Maintenance Area

Hydrologic Features

- Major Creek
- Other Creeks and Drainages
- Lake / Pond
- Ocean / Bay

Administrative Areas

- County Park
- Colma Incorporated City
- Montara Unincorporated Area

Physical and Regulatory Boundaries

- Bayside / Coastside Watershed Boundary
- Coastal Development Zone Boundary

Transportation

- Highway / Major Road
- Street
- Airport



0 1 2 4 Miles

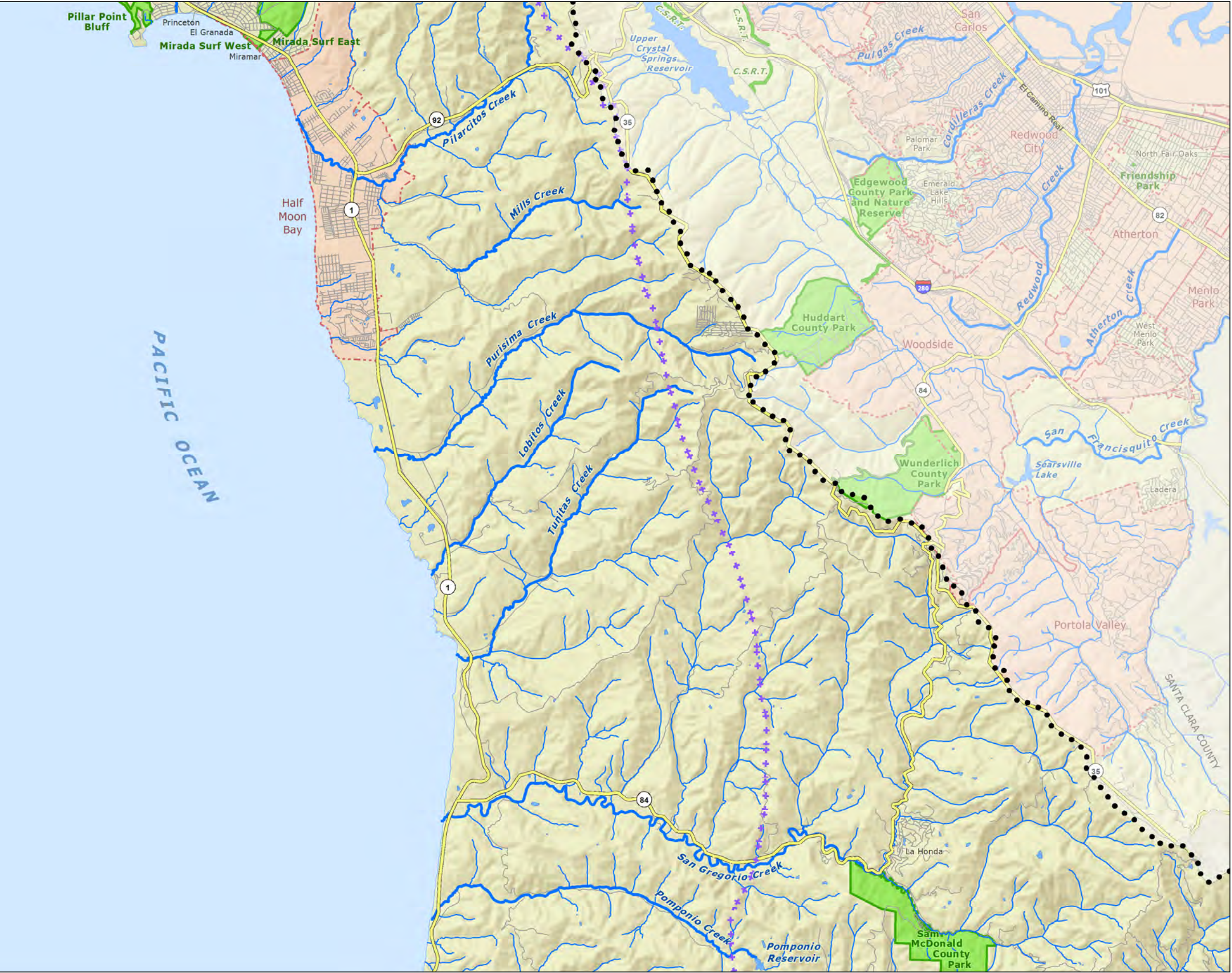


Figure 5

**Central Coastside of
San Mateo County
Maintenance Area**

Hydrologic Features

- Major Creek
- Other Creeks and Drainages
- Lake / Pond
- Ocean / Bay

Administrative Areas

- County Park
- Incorporated City
- Unincorporated Area

Physical and Regulatory Boundaries

- Bayside / Coastside Watershed Boundary
- Coastal Development Zone Boundary

Transportation

- Highway / Major Road
- Street
- Airport



0 1 2 4 Miles



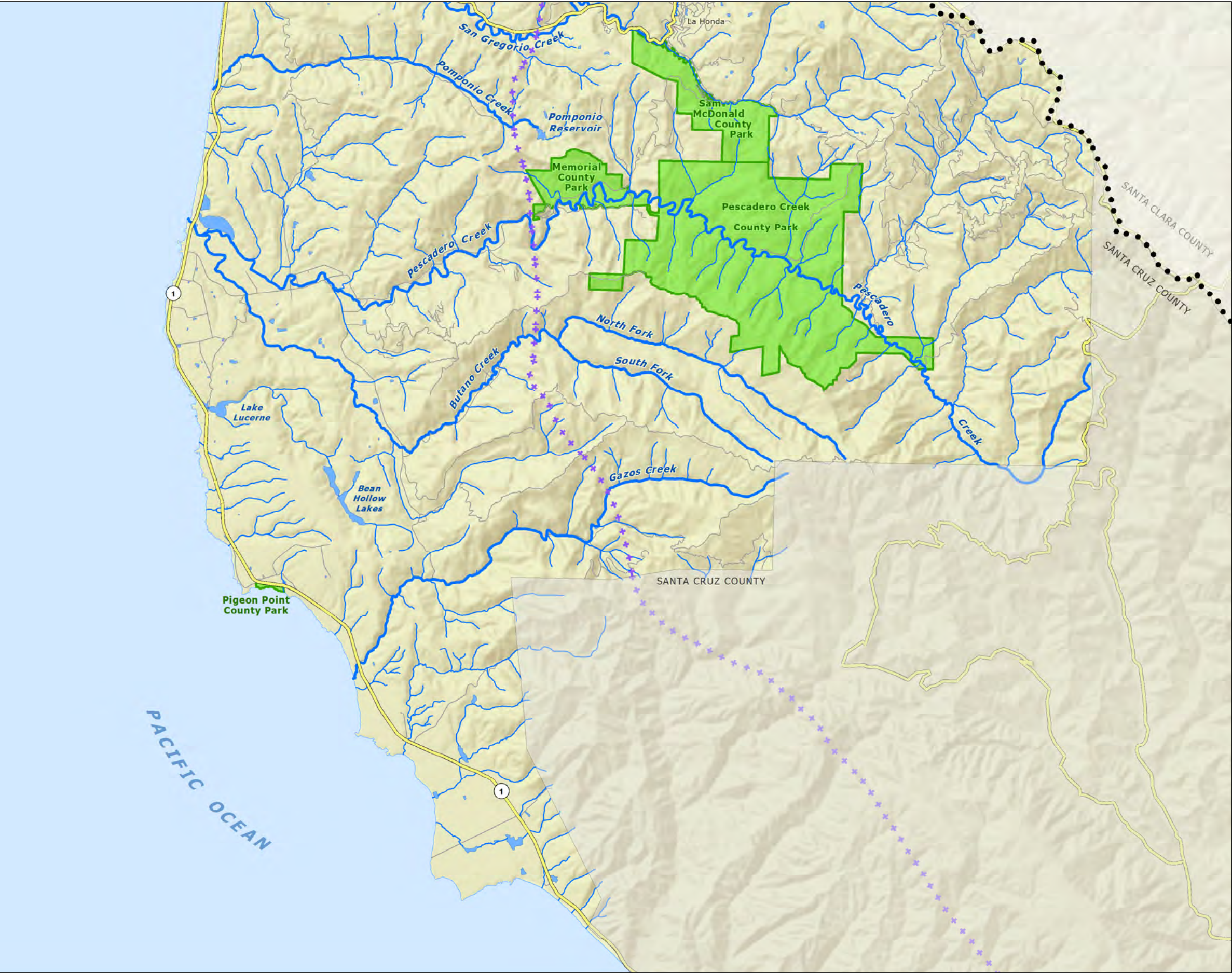


Figure 6

**South Coastside of
San Mateo County
Maintenance Area**

Hydrologic Features

- Major Creek
- Other Creeks and Drainages
- Lake / Pond
- Ocean / Bay

Administrative Areas

- County Park
- Colma Incorporated City
- Montara Unincorporated Area

Physical and Regulatory Boundaries

- Bayside / Coastside Watershed Boundary
- Coastal Development Zone Boundary

Transportation

- Highway / Major Road
- Street
- Airport

N

0 1 2 4 Miles

4. Project Description

The Maintenance Program is outlined in the County of San Mateo Routine Maintenance Program Manual. A summary of the maintenance activities proposed for each key facility type or feature is described in **Table 1**. A description of the various Maintenance Program activities is provided following Table 1.

Table 1. Summary of Key Facility Types and Maintenance Activities

Facility or Feature	Maintenance Activity
On-channel crossings	Culvert repair or replacement Sediment and debris removal
Bridges	Erosion protection at bridge abutments Apply protective paint coating Seal/repair cracks on bridge deck and concrete surfaces
Roadside ditch relief culverts	Culvert repair or replacement Sediment and debris removal
Flood control channels, drainages and creeks (engineered and non-engineered)	Sediment and debris removal Bank stabilization Downed tree management Vegetation management
Roadside ditches and swales	Ditch or swale resurfacing Sediment and debris removal Vegetation management
Roads	Repaving and repair of damaged paved roads Street sweeping on paved roads Slip-out and slide repairs (including removal of slide material) Mowing, trimming, and pruning vegetation along County roads
Trails, campgrounds, picnic areas, and other County Parks features	Trail tread repair and re-grading Mowing, trimming, and pruning vegetation along trails Non-native vegetation removal (e.g. herbicide, grazing, mechanical) Fire fuel management
Low Impact Development (LID) sites	Vegetation and thatch removal Light sediment clearing and planting
Marina facilities including docks, sewer lines/tanks, water lines, and launch ramp	Repair/replace damaged dock boxes and concrete Periodic sewer line/ejector tank cleaning Water line inspections Replace damaged floats, cleats and bumper striping Debris removal from launch ramp Inspect channel entrance pilings, markers, and lighting
Storm drain facilities (storm drain pipes, manholes, catch basins, pump stations)	Debris clearing, flushing, and cleaning

Culvert, Storm Drainage, and Bridge Maintenance

The County owns and maintains many culverts at road and trail crossings, which commonly require routine repair or replacement due to material deterioration, damaged headwalls, or eroding outlets. The Maintenance Program addresses repair and replacement of standard culverts generally 60 inches or less in diameter within the County's jurisdiction.

Additionally, the County is responsible for clearing clogged culverts, storm drains, manholes, catch basins, and other storm drainage facilities in unincorporated areas of the County. Bridge maintenance involves conducting erosion protection improvements at the base of bridge abutments, repairing railings and the decking on bridges, patching up cracks on the bridge exterior, paint removal and re-application, and debris clearing.

Roadside Ditch and Swale Maintenance

Roadside ditches, including V-ditches, and swales collect stormwater runoff from the adjacent road surface. Unpaved and paved roadside ditches/swales are typically cleaned annually during the late summer or early autumn months (August through October) to preserve drainage capacity. Cleaning methods are conducted by either hand, vacuum, ditch witch or backhoe to remove debris, trash, or sediment. Removed material is then hauled and disposed of in an area where the removed materials will not be discharged into a water body or drainage facility. Typical maintenance activities at Low Impact Development (LID) sites and Green Infrastructure (GI) (e.g., biofiltration areas, rain gardens bulb outs and flow-through planters) includes trash removal, storm drain inlet and outlet cleaning, weed removal, light sediment clearing, and replanting vegetation on an as-needed basis to maintain infiltration capacity.

Sediment Removal

Sediment removal occurs in both engineered channels (e.g., concrete box culverts) and natural creeks as well as in smaller ditch relief culverts and larger on-channel culverts at road crossings and trails. Sediment removal activities from channels and beneath bridges typically occur at focused localized sites that experience sediment deposition or blockages. For this Maintenance Program, sediment removal activities are limited to localized sites that are 500 feet in length or less for general activities and 100 feet in width or less for creek and road crossings. If mechanized sediment removal is necessary, an excavator or backhoe is used from the top of bank or road. A vacuum truck is typically used to extract sediment that has accumulated beneath bridges or within culverts and silt fencing, wattles, or straw bales are placed across the culvert outlet or at the downstream end of a bridge to contain or filter out any sediment-laden water from unnecessarily entering the vacuum truck. This work is necessary when culvert outfalls are blocked with debris or sediment and conveyance capacity is reduced by 30% or more. Sediment removal work typically occurs during the dry season.

Creek Bank Stabilization

Creek bank stabilization activities involve the repair and stabilization of eroded or eroding banks and would take place on an as-needed basis. The number of bank stabilization

projects required in any given year varies depending on weather and hydrologic conditions (i.e., there may be more bank stabilization projects in wet years). Based on site conditions, including consideration of slope stability, earth materials, geomorphic processes, and instream hydraulic conditions, the County will either use biotechnical treatments or more hardscape engineered solutions. Typical biotechnical treatments that are implemented include brush layering, brush packing, live staking, use of native materials like large woody debris to anchor a streambank, soil and grass covered revetments, or log, rootwad and biorevetments. In the event that biotechnical approaches are deemed unsuitable due to site conditions (e.g., hydraulic and/or geomorphic conditions, and severity of the bank failure), the County then considers hardscape engineered solutions such as riprap, concrete, shotcrete, or soil nailing to stabilize creek banks. To the extent feasible, equipment is operated from top of bank and work is completed during the dry summer months between June and October when creek flows are low or absent. When bank stabilization projects occur, banks will be recontoured to match the adjacent bank slope and returned to the pre-failed condition.

In an average hydrologic year (based on average seasonal precipitation), individual creek bank stabilization or slip-out projects would not exceed 250 feet in length and the total annual work distance would not exceed 750 feet (for all sites). In a wet hydrologic year, individual creek bank stabilization projects would not exceed 250 feet in length and the total annual work distance would not exceed 1,500 feet (for all sites). For further description about slip-out repairs, see the discussion under “Roadway Maintenance and Repair” below.

Vegetation Management Activities

Vegetation management activities conducted routinely through the Maintenance Program include mowing, trimming and pruning, tree removal, herbicide application, grazing, and fallen tree removal. The goals of routine vegetation management are to maintain the operational capacity of County flood control facilities through pruning, thinning, or removing vegetation; maintain sight distances and clearances for motorists along County roads to reduce safety hazards; reduce or eliminate invasive/exotic weeds at County facilities; maintain defensible space around County facilities to reduce fire fuel loads and fire risks and hazards; and maintain open space along County fire roads and trails. These types of vegetation management activities are conducted routinely and relatively consistently from year to year; however, the work locations may change yearly. A brief summary of where these vegetation management activities typically occur is provided below.

Mowing

The County routinely mows ruderal vegetation that grows along County roads, trails and/or fire access roads to reduce fire and public safety hazards. DPW’s Road Maintenance Division mows roadside vegetation to maintain sight distances for motorists. The County’s Parks Department also conducts mowing along County-maintained trails and fire access roads to control growth of non-native plants, maintain fire breaks and reduce fuel loads, and to maintain trails and other highly used recreational areas. Mowing activities occur at various

times of the year, and the amount and timing depends on the amount of rain received in a given year.

Fuel Management

Managing fuel load and fire hazards is one of the top priorities of the County's Parks Department. For the Maintenance Program, typical fuel management activities conducted by the County include selective tree thinning and selective removal of undergrowth of non-native plants. Removal methods may involve use of mowing, herbicides, physical removal using work crews, or grazing.

Trimming and Pruning

Trimming and pruning trees and shrubs are routine activities necessary to provide access to County facilities (e.g., roads and trails), improve visibility to inspect County facilities, and protect infrastructure. DPW conducts thinning and pruning to maintain the designed hydraulic capacity of flood control facilities and to maintain the safety of vehicle traffic and pedestrians. The County Parks Department also conducts this work along trails and fire roads, and within 100 feet of facilities, campsites, and picnic areas where open flame is permitted. Once work is completed, trimmed matter (limbs, vines, brush, etc.) is hauled and disposed of at an off-site location.

Tree Removal

The County's Road Maintenance crew removes trees in the County right-of-way to maintain line of sight clearance and appropriate height clearances for vehicles and pedestrians, and to minimize risks of potential hazards to the public. A tree is considered a hazard if the tree is considered to have a high likelihood to fall within the coming year (due to storm, high wind, natural decay, or other causes) and the falling of that tree could pose a direct hazard to people, roads, or other infrastructure and County facilities. The Parks Department identifies and removes hazardous trees on a continual basis and takes into consideration visitor frequency. In general, hazard trees in areas where human uses are expected to be low (e.g., in the interior portion of a forest community far away from any trails) are left as is. Hazard trees in highly used areas such as major trails, picnic areas, campgrounds, and parking lots, are assessed annually for impending hazard.

Herbicide Application

Consistent with the County's Integrated Pest Management (IPM) Policy (Resolution No. 070851), the Maintenance Program uses an integrated approach of chemical and mechanical methods to control weeds and other non-native plant growth, to help reduce fire hazards, and to prevent re-sprouting of removed trees along trails, roads, and on County lands. Mechanical treatments, such as mowing, are generally used along roadsides to prevent weed damage to roads, to maintain adequate site distance for drivers, to control spread of invasive species, and to minimize fire hazards. Herbicides may be used when mechanical applications are deemed ineffective at managing vegetation removal needs.

Herbicides are also used in combination with mechanical methods to control invasive plants at on County-owned parcels in Pescadero (including a closed landfill) and the Half Moon Bay Airport. Herbicides are used sparingly in open space areas within County parks and only qualified herbicide applicators with experience applying herbicides in natural settings are contracted to conduct this work with a Park representative's oversight. Near water bodies, herbicide use is limited to control non-native plant species where excess vegetation may cause sediment deposition and/or debris accumulations that result in flooding or damage to public facilities. The County complies with two court-ordered injunctions issued in 2006 in 2010, which were issued for the purpose of limiting herbicide use near habitats known to support California red-legged frog or 11 other special-status species. In areas of the County that provide habitat for California red-legged frog and other special-status species covered by the two injunctions, the Departments limit herbicide application on invasive plants and noxious weeds in accordance with exceptions to these injunctions (e.g., maintain a 20-foot buffer around certain aquatic habitat that provide red-legged frog habitat when applying herbicides for invasive plant control).

Grazing

Livestock grazing is conducted to control growth of herbaceous weeds, brush, and non-native plants; and for fuel management purposes on County park lands. More specifically, DPW conducts annual goat grazing at closed landfills including the Pescadero Landfill and Half Moon Bay Landfill. Grazing entails use of livestock to provide non-targeted weed control in a particular area. Before grazing commences, protective fencing is installed and then small herds are put on parcels for a set amount of time determined by range ecologists. Grazing animals are also excluded from channels and other water sources. This activity is typically done in late spring or early summer when vegetation is palatable to the grazing animals.

Downed Tree Management

The County removes fallen trees in urban or high-use park settings if the fallen tree presents a safety or hazard risk. The County may also saw or chip the downed tree in place if the tree is deemed as a potential hazard and located in a low-use rangeland or watershed setting. If the fallen tree does not present a safety or hazard risk, the County may leave it in place.

When downed trees occur along stream courses, the County evaluates the tree for its potential to cause or increase erosion, flooding, bank failure, or negatively impact a facility such as a bridge or culvert. If erosion and flooding risks are unlikely, the County seeks opportunities to maintain the downed tree as a habitat feature along the stream. The County retains a biologist or arborist knowledgeable of channel conditions when considering whether a downed tree may be preserved in place, repositioned in a channel, or cut into smaller pieces. In the event that a downed tree cannot be retained on-site, the downed tree may be removed and re-used elsewhere in the County. To the extent feasible, redwood and Douglas-fir trees fallen from County property are protected and re-used in bank stabilization and/or habitat enhancement projects.

Invasive Plant Removal

The County removes invasive plants on properties managed by DPW and the Parks Department to control the spread of invasive plants and to reduce fire hazards. Methods used to remove invasive plants include a combination of hand removal, mechanical methods, and herbicide application. As described above, grazing may also be used to control non-native growth on Park lands.

Road and Trail Maintenance Activities

Roadway Maintenance and Repair

The County is responsible for maintaining both paved and unpaved road surfaces. Primary paved road maintenance activities include repairing potholes and roadway bases, repaving, replenishing gravel, extending pavement edges, paving graveled shoulders, sealing cracks and chips and slurry, resurfacing, and adding pavement marking and traffic control features. Other paved road maintenance activities include street sweeping to remove soil, organic material, dust and debris from County roads; and maintaining shoulders within the County's right-of-way to provide a smooth transition from the edge of pavement to the shoulder surface, where feasible. Primary unpaved road maintenance activities involve re-grading the road to its existing grade or original cut, repair of rolling dips, filling ruts, relocating road surface materials that have moved due to erosion, re-establishing turn around areas for emergency vehicles, and repairing slip-outs/slides. Unpaved roads are inspected at the end of the rainy season and any hazardous conditions noted during these inspections are scheduled for repair prior to the next rainy season. All of these activities are conducted to ensure a safe roadway surface for motorists and to prevent further roadway deterioration or failure. To the extent feasible, maintenance of roads would occur during the dry season, typically between April and October.

Trail Maintenance and Repair

Trail maintenance and repair activities include repairing trail surfaces (tread); re-grading work on worn down trails due to heavy use; repairing water bars, rolling dips, and drainage ditches to prevent or reduce erosion and downstream sedimentation issues in nearby channels and creeks; repairing and installing signage; removing graffiti; and repairing other trail-related structures. Trail repairs are prioritized and completed based on the periodic inventory conducted during spring and summer by maintenance staff. During these inventories, maintenance crews make note of trail conditions (e.g., drainage and surface conditions) and potential need for other maintenance activities, such as vegetation clearing.

Marina Maintenance Activities

Other minor maintenance activities conducted by the Parks Department include routine maintenance at the Coyote Point Marina, which is located about six miles southeast of the San Francisco International Airport. Routine maintenance at this marina involve inspections of the pump out facility, dock repairs, water line inspections, and boat launch ramp maintenance. The Parks Department is also responsible for inspecting the channel entrance

pilings, day markers, entrance lights and range lights. Other minor maintenance includes periodic inspection and replacement of wood pilings, removing hazardous logs and driftwood, and re-rocking the berm where rocks have fallen. The County also measures the depth of the channel entrance/breakwater at the marina to determine the need for future dredging work.

5. CEQA Process

Notice of Preparation

This Notice of Preparation (NOP) presents general background information on the Program, the scoping and larger CEQA process, and the environmental issues to be addressed in the EIR. The County has prepared this NOP pursuant to CEQA Guidelines Section 15082.

Scoping Meeting

In order for the public and regulatory agencies to have an opportunity to ask questions and submit comments on the scope of the EIR, a public scoping meeting will be held during the NOP review period. The scoping meeting will solicit input from the public and interested public agencies regarding the nature and scope of environmental impacts to be addressed in the Draft EIR.

At the meeting, a brief presentation will be made in order to provide an overview of the Maintenance Program and the CEQA process generally. Afterwards, an interactive session will follow where County staff will be available to answer questions and provide information about the Program. Prepared written comments will be accepted during the meetings, as well as during the 30-day NOP review period. Comment forms will also be available at the scoping meetings for those who wish to submit written comments during or at the meeting. Again, written comments may be submitted to the County at any time during the NOP review period.

The public scoping meeting is scheduled for Tuesday, January 29, 2019 from 6:00 p.m. to 8:00 p.m. 455 County Center, Room 101, Redwood City.

This scoping meeting information is also available on the County's website (<https://publicworks.smcgov.org/our-projects>).

Draft EIR

The primary purpose of the EIR is to analyze and disclose the reasonably foreseeable direct and indirect environmental impacts that may occur as a result of the Maintenance Program. The Draft EIR, as informed by public and agency input through the scoping period, will analyze and disclose the potentially significant environmental impacts associated with the Maintenance Program and, where any such impacts are significant, identify potentially feasible mitigation measures and alternatives that substantially lessen or avoid such effects will be identified and discussed.

Below is a preliminary list of potential environmental impacts to be addressed in detail in the EIR. The analysis in the Draft EIR ultimately will determine whether these impacts are reasonably foreseeable, whether they are significant based on identified thresholds of

significance, and whether they can be avoided or substantially lessened by potentially feasible mitigation measures and alternatives.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services and Utilities
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Cumulative Impacts

Public Review of the Draft EIR

Once the Draft EIR is completed, it will undergo public review for a minimum of 45 days. The County will also hold a public meeting. The meeting will begin with a brief overview of the analysis and conclusions set forth in the Draft EIR. This introductory presentation will then be followed by the opportunity for interested members of the public to provide oral comments to the County regarding the Maintenance Program under CEQA. The date, time, and exact location of the public meeting will be published in local newspapers prior to the event.

Final EIR

Written and oral comments received in response to the Draft EIR will be addressed in a Response to Comments document which together with the Draft EIR will constitute the Final EIR. The Final EIR, in turn, will inform the County's exercise of discretion as a lead agency under CEQA in deciding whether to approve the Maintenance Program. The Final EIR will also be used by responsible agencies and other permitting agencies in their decision-making to renew the Program permits.

6. Submittal of Scoping Comments

This NOP is being circulated to local, state, and federal agencies, and to interested organizations and individuals who may wish to review and comment on the Maintenance Program or the Draft EIR at this stage in the process. In addition, the NOP is available for review at the County's offices and on the County's website (<https://publicworks.smcgov.org/our-projects>). Written comments concerning the scope and content of this EIR are welcome.

Consistent with the time prescribed by State law for public review of a NOP, your response to and input regarding the project should be sent at the earliest possible date, but ***not later than February 5, 2019***. Please include your name, address, and contact number for your agency as applicable for all future correspondence related to the Program. Written comments may be sent via email or letter to:

County of San Mateo
Attn: Krzysztof Lisaj
Routine Maintenance Program Comments
555 County Center, 5th Floor
Redwood City, CA 94063

Email: SMC_RMP_Comments@smcgov.org
Subject Line: Routine Maintenance Program Comments