



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Arnold Schwarzenegger
Governor

February 8, 2010

Supervisor Steve Kinsey
Marin County Board of Supervisors
3501 Civic Center Drive, Suite 329
San Rafael, Ca. 94903

Re: Comments on the San Geronimo Valley Salmon Enhancement Plan

Dear Supervisor Kinsey:

Thank you for the opportunity to comment on the San Geronimo Valley Salmon Enhancement Plan, dated February 9, 2010 (Enhancement Plan). The purpose of this letter is to express support for the core strategies and recommendations identified in the Enhancement Plan. The Enhancement Plan represents an important first step to protect and maintain salmon habitat. We believe the essential next step will be for the County to express its strong support for implementation of the plan. In order to be successful, four areas will require close attention in moving from recommendations to actions:

- 1) Community involvement to define a shared vision is essential to success. Most stream-side parcels already are developed, therefore partnerships and incentives will play an essential role in the overall program to protect and enhance habitat conditions.
- 2) Development of an implementation plan that sets forth actions, both voluntary and required, for new and redevelopment projects is necessary. An accountable process that evaluates new and redevelopment projects and any impacts on stream and watershed processes will allow you to adaptively manage the watershed and improve decision making.
- 3) County regulations influencing development should be clarified. The enhancement plan does not provide necessary detail. For example, 100-foot setbacks are mandated in stream conservation areas. In order for all stakeholders to understand how this works on the ground, "setback", "of what", and "from what", all need to be clearly defined and/or described.

Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 50 years

- 4) There appear to be key data gaps regarding existing conditions and evaluation of cumulative effects. We previously submitted comments to this effect and believe important questions remain to be addressed. We urge the County to provide additional funding to address these gaps in the near future. By doing so, project reviews could be streamlined, and the overall effectiveness of resultant protections and mitigations would be enhanced.

Coho populations in Central California are close to extinction, and actions to improve population viability in the freshwater phase of their life cycle are critical and urgent. The riparian and aquatic ecosystems in the San Geronimo Valley are clearly degraded due to historic and current land uses. In several public meetings citizens have expressed concerns that their efforts will be fruitless due to the overwhelming influence of ocean conditions and dams in the Lagunitas watershed. The effect of these influences cannot be minimized as they do play a significant role. However, the role of the remaining freshwater habitat should not be minimized, because providing a healthy freshwater ecosystem is essential to the survival of salmonid populations.

There are many notable examples, such as the Russian River and Walker Creek, in which coho have been extirpated. The coho from these watersheds experienced the same general ocean conditions as the Lagunitas coho, yet only the Lagunitas Creek coho have survived. This comparison points to the importance of protecting and restoring freshwater conditions in the recovery of the species.

Water Board staff have participated fully in the process of developing the Enhancement Plan. We appreciate the hard work and sincere effort that have gone into its development. We encourage the County to accept the Enhancement Plan as a starting point for further action. We will continue to work collaboratively with the County and watershed stakeholders in protecting the valuable resources of the San Geronimo Valley. Thank you for the opportunity to comment and participate in this important process.

If you have any questions, please contact Leslie Ferguson at (510)622-2344 or Mike Napolitano at (510)622-2362, or via e-mail at lferguson@waterboards.ca.gov or mnapolitano@waterboards.ca.gov respectively.

Sincerely,

Dyan Whyte
Assistant Executive Officer