

**A Call by Leading Scientists
to Increase Watershed Protections for Endangered
Central Coast California Coho Salmon
in Marin County, CA
September 2010**

Central California and North Coast wild coho salmon¹ are on the verge of extinction (Science, January 29 2010), and the past two years of severely declining numbers of both spawning adults and coho smolts returning to sea require that we take urgent and immediate actions to prevent their extirpation.

As scientists concerned with the health and recovery of salmonid populations throughout California, we strongly support increased habitat protections for the largest remaining wild population of CCC ESU coho salmon, located in the Lagunitas Creek Watershed, west Marin County, CA. This population makes up 10-20% of the fish across the entire ESU and is a keystone to recovery of the entire region's population.

Lands in the lower reaches of the Lagunitas Creek watershed are relatively well protected (they include State Parks, National Parks and Recreation Areas, and County and Water District property) and maintain habitat values important to coho and other native species.

But, thirty-one percent of spawning in the Lagunitas Creek Watershed occurs in the relatively small 9 sq. mi. un-dammed headwaters area of the San Geronimo Valley. And the out-migration research documents that upwards of 40% of all Lagunitas Creek coho rear in these headwater reaches too (SPAWN 2009).

The San Geronimo Valley supports a growing human population whose lands are governed by elements in the Marin County General Plan and by the County Board of Supervisors. Continued loss of critical riparian habitats and floodplains to development, increased erosion and sedimentation of spawning gravels, stormwater runoff as a result of increasing impervious surfaces, especially within the streamside corridor, and invasive species, and chronic leaking septic systems cumulatively pose a significant threat to the survival of coho salmon here.

We appreciate the fact that the Board of Supervisors heeded some of the advice from a previous open letter (September 2007) from many of the same scientists that are writing to you today. Though not placing a complete halt to loss of habitat in the 100-foot Stream Conservation Area (SCA), the County did place a temporary moratorium on issuing new building permits, which reduced new construction in the SCA until the County completed an independent review of the science.

¹ Wild coho salmon populations have undergone a ninety-percent decline in California since the 1940s. The causes of this decline such as urbanization, dams, and logging operations are well known and documented. All California coho were listed as "threatened" by the US government in 1997 and the Central California Coast Evolutionarily Significant Unit (CCC ESU) coho salmon was down-listed to "endangered" status in 2005. The State of California listed the populations north of San Francisco as endangered in 2002.

Furthermore, though the County did not complete the requested Cumulative Impact Analysis (CIA), as required under California's Environmental Quality Act (CEQA), to inform the County on degradation thresholds and the limits of development that coho can withstand, we do recognize the County did complete an Existing Conditions Report and Salmonid Enhancement Study to provide some of the analysis that would be found in a CEQA CIA.

Unfortunately, since the moratorium ended on February 9, 2010, no new protections have been enacted to address loss and degradation of habitat.

In recognizing that measures which protect coho salmon in their freshwater habitat will also benefit a wide range of species including threatened steelhead trout and chinook salmon, and over 225 birds, mammals, reptiles, and amphibians depend on California's riparian habitat, we urge the County of Marin to take new IMMEDIATE and urgent actions to implement the highest standards of protections for the San Geronimo Valley headwaters region, which include both incentives to encourage voluntary actions of San Geronimo Valley residents, but also adequate regulations to prevent continued loss and degradation of habitat. It is important to understand that the activities that occur in the San Geronimo Valley that result in loss of spawning, refuge and nursery habitat, and pollute streams with documented high levels of fecal coliform, sediment and nutrients impact the entire Lagunitas population of coho that occur downstream in our State and National Parks.

We recommend that the County immediately implement the following specific actions:

1. **Enact a Native Riparian Forest Management Policy and Ordinance** that prohibits removal of streamside native vegetation. Right now, there is NO special protection for streamside trees and landowners are permitted to remove five trees/year without a permit.
2. Implement **strict enforcement of violations and illegal new development** in the 100-foot Stream Conservation Area.
3. Require any new development in coho watersheds meet **a zero net increase in storm-water run-off** for the life of the project.
4. **Close loopholes in the Stream Conservation Area ordinance** and modify the draft County-wide Plan to eliminate provisions that allow new construction in the SCA and a net loss of critical riparian habitat.

Sincerely,
Signatures as of 7 September 2010.

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