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Matt St. John
North Coast Regional Water Quality Control Board
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Santa Rosa, CA 95403
fax : 707-523-0135
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RE: Comments for the North Coast Regional Water Quality Control Board's 2008 303(d) List of Water Quality Limited Segments

Dear Mr. St. John:

On behalf of the California Coastkeeper Alliance (CCKA), which represents 12 Waterkeepers from the Oregon border to San Diego, including Russian Riverkeeper, Humboldt Baykeeper, and Klamath Riverkeeper in Region 1, I welcome the opportunity to submit these comments on the Public Review Draft 2008 303(d) list of impaired waters. CCKA commends the North Coast Regional Water Quality Control Board (Regional Board) staff's proposed additions to the 2008 303(d) list and strongly urges the Regional Board to endorse the addition of these water quality impaired segments to the 2008 303(d) list.

Russian River Watershed

In the Russian River watershed, CCKA supports Regional Board staff's recommended additions to the 303(d) list. Specifically, CCKA strongly supports the following listings:

- Laguna de Santa Rosa – Indicator Bacteria
- Green Valley Creek – Indicator Bacteria and Dissolved Oxygen
- Russian River HU, Lower Russian River HA, Guerneville HAS – DDT

Readily available data, as included in your 303(d)/305(b) Integrated Report Supporting Information, strongly support these proposed listings. Data collected from the Russian River First Flush sampling events provide a preponderance of evidence to place Laguna de Santa Rosa and Green Valley Creek as impaired by indicator bacteria on the 2008 303(d) list. Indicator bacteria raise the risk of waterborne diseases ranging in severity from ear infections to gastroenteritis to hepatitis A. Excessive indicator bacteria can signal the presence of excess organic material that can also starve fish of oxygen they need to survive, of which there is evidence in Green Valley Creek, which Regional Board staff have also recommended be listed as impaired for dissolved oxygen, a listing which CCKA also strongly supports.

Indicator bacteria in these water bodies impede the ability of Californians to enjoy water contact recreation in the Russian River watershed, and dissolved oxygen impairment in Green Valley Creek severely threatens cold freshwater habitat aquatic life uses, including fish migration and spawning, and the preservation of rare and endangered species.

Regional Board staff's proposal to place the Lower Russian River on the 2008 303(d) list as impaired for DDT is strongly supported by state data collected through the State Water Board's own Surface Water Ambient Monitoring Program (SWAMP). CCKA strongly agrees with this proposal, and urges the Regional Board to take swift action with an aggressive Total Maximum

Daily Load (TMDL) to remediate this severe impairment, which threatens the public health and welfare of Russian River watershed residents by compromising the safety of domestic and municipal water supplies with DDT, a recognized carcinogen, and developmental and reproductive toxicant.

CCKA welcomes the opportunity to comment here on an existing North Coast 303(d) listing in the Russian River Watershed. Through communication with Santa Rosa-based Friends of Mark West Creek, CCKA has learned that temperature and sediment impairment on the 303(d)-listed Mark West Creek has only worsened since being placed on the 303(d) list in 2002 as impaired by sediment and temperature. Currently, the TMDL schedule estimates that temperature and sediment impairment on Mark West Creek will be remediated through a TMDL by 2019. Given the accelerating rate of vineyard conversion on the Mark West Creek Watershed, further inaction on the Mark West Creek will facilitate increasingly severe sediment and temperature impairment in this critical cold freshwater habitat for many native fish species, including steelhead and salmon; for this reason, CCKA strongly urges the Regional Board to pursue a more aggressive TMDL schedule that will quickly remediate and restore water quality on this critical tributary to the Russian River.

Humboldt Bay Watershed

In the Humboldt Bay watershed, CCKA strongly supports Regional Board staff's recommended addition of the Mad River as impaired by DDE to the 2008 303(d) list. Readily available data from the State Water Board's own SWAMP program support this listing. DDE is a recognized carcinogen and suspected endocrine, liver, and neurological toxicant. CCKA strongly agrees with this proposed listing, and urges the Regional Board's stamp of approval as well as swift action with an aggressive TMDL to remediate this severe impairment, which threatens the public health and welfare of Humboldt Bay watershed residents who rely on the Mad River as a primary source of drinking water.

Also in the Humboldt Bay watershed, CCKA strongly supports the continued listing of Humboldt Bay itself for dioxin impairment on the 2008 303(d) list. Dioxin is extremely toxic, threatening the species that live in and around the Bay, as well as the public health of Humboldt Bay residents. Samples submitted to support the 2006 listing of Humboldt Bay for dioxin impairment showed the severity of dioxin pollution in the Bay, as evidenced by dioxin levels in the Humboldt Bay food chain well above screening levels set by California's Office of Environmental Health Hazard Assessment. This crucial 303(d) listing affirms the need for clean-up and mitigation of pernicious dioxin pollution in Humboldt Bay, and it enables local agencies to seek the critical funding necessary for such remediation.

Klamath River Watershed

In the Klamath River watershed, CCKA supports Regional Board staff's recommended additions to the 303(d) list. Specifically, CCKA strongly supports the following listings:

- Klamath River (Scott River to Trinity River) – Cyanobacteria hepatotoxic microcystins and Sediment
- Klamath River (Iron Gate Dam to Scott River) – Cyanobacteria hepatotoxic microcystins and Sediment
- Lake Shastina – Mercury

CCKA *opposes* the proposal to delist Wooley Creek as impaired for temperature.

The Regional Board staff's recommendation to list the above stretches of the Klamath River as impaired for cyanobacteria hepatotoxic microcystins on the 2008 303(d) list recognizes the severity of toxic algae impairment on the Klamath River, and the severe threat that this impairment poses to Native American culture, subsistence fishing, and commercial and sport fishing. Toxic algae is a known liver toxicant; it threatens the public health and welfare of Klamath River communities. Fish tissue samples collected and

analyzed by the California Department of Fish and Game make an overwhelming case for the listing of the Klamath River from Scott River to Trinity River, and Iron Gate Dam to Scott River, as impaired by cyanobacteria hepatotoxic microcystins. CCKA strongly urges the Regional Board to support these listings.

Sediment impairment on the Klamath River smothers important habitats like salmon-spawning grounds and underwater vegetation. Oxygen-rich pools necessary for rearing young salmon are eliminated when sediment overwhelms streambeds. Data submitted to Regional Board by staff of the Klamath National Forest provide strong evidence for sediment impairment on the Klamath River from Scott River to Trinity River, and from Iron Gate Dam to Scott River. CCKA strongly urges the Regional Board to support these listings and incorporate them into an aggressive TMDL to restore water quality on the Klamath River and its tributaries.

Two-thirds of fish fillet tissue composite samples analyzed from Lake Shastina by the Department of Water Resources exceeded guidelines for mercury. These data strongly support the Regional Board staff's proposal to list Lake Shastina as impaired by mercury on the 2008 303(d) list. Mercury is a potent neurotoxin, especially dangerous to developing fetuses and young children, and poses severe public health risk to subsistence fishers and their families. CCKA strongly urges the Regional Board to endorse the Regional Board staff's proposal to list Lake Shastina as impaired by mercury.

Lastly, CCKA strongly opposes Regional Board staff's proposal to delist Wooley Creek as impaired for temperature. Wooley creek is a major tributary to the Salmon River, which is in turn tributary to the Klamath River. Members of the Salmon River Restoration Council (SRRC) commonly observe dangerously high water temperatures in Wooley Creek; last summer, the SRRC often saw temperatures in Wooley Creek exceed 72 degrees. Given the severe temperature impairment of the already 303(d)-listed Salmon River, CCKA finds it imprudent to for the Regional Board to ignore temperature impairment in Wooley Creek, which contributes to the severity of the problem on the Salmon River. CCKA fears that neglecting to address temperature impairment in Wooley Creek would compromise efforts to address temperature impairment on the Salmon River; it is difficult to fully remediate temperature impairment in a river if temperature impairment in significant tributaries is ignored. For these reasons, CCKA strongly urges the Regional Board to keep Wooley Creek listed as temperature impaired on the 2008 303(d) list. Elevated temperatures in Wooley Creek pose a significant threat to salmon that depend on cold, abundant water.

Thank you for this opportunity to comment on the proposed 2008 303(d) list for California's North Coast region. CCKA appreciates your consideration of these comments in your process of drafting California's 2008 303(d) list water quality limited segments. If you have any questions or would like discuss any of the above recommendations further, do not hesitate to contact me.

Sincerely,



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