

Letter 1.508: We acknowledge the support of NOAA for the proposed North Coast listings.

NOAA fully supports the adoption of the resolution to approve the 2002 303(d) List, and specifically the listings for impaired waterbodies relating to the North Coast salmonid waters. All of the proposed waterbodies support salmonids as listed as threatened under the Federal Endangered Species Act.

Many contain Coho salmon, which the California Fish and Game commission found were warranted for listing under the ESA in August 2002.

- The resolution proposes to add ten listings to the 303(d) List which are of importance to salmonids covered under both the State and Federal Endangered Species Acts.
 - Russian River, Redwood Creek, Gualala River, Big River, Ten Mile River, Mad River listings for Temperature.
 - Stemple Creek and Jacoby Creek listed for Sediment.
 - Laguna de Santa Rosa listed for dissolved oxygen and Monitoring List for Nutrients.
- These waterbodies are not meeting their beneficial uses and in particular, the cold water fishery use is impaired. The six waterbodies that are proposed for temperature listings are all currently listed as impaired by excessive sediment. Four of which have already undergone TMDL development for sediment, and the need for listing has been confirmed. Excessive sedimentation is often a factor in temperature impairment as the sediment fills in deep water pools displacing cold water refugia for fish (Bjorn and Reiser, 1991 and Spence et. al , 1996)
- Streams become wider and shallower due to excessive sedimentation. The increased surface area of the waterbody coupled with the smaller volume of water flowing above ground allows for greater heating of the water body from solar radiation. Exposure has increased in these waterbodies due to the removal of riparian vegetation during poorly managed timber harvest or agricultural development.
- The Maximum Weekly Average Temperature (MWAT) methodology was used in all the studies of summer rearing conditions and has been a standard used by the Sates and the U.S.EPA for at least two decades! These thresholds determined that temperature thresholds are indicative of an impairment of beneficial uses. A very impressive data set was collected and analyzed by the RWQCB staff, all of the proposed waterbodies had a minimum of 33 sites and several years of sampling.
- For your futher consideration a strong correlation between land use activities and specific beneficial use impairment has emerged on the North Coast of CA. and in the Pacific Northwest. The watersheds proposed for listing have all experienced significant logging prior to the adoption of the Forest practice rules (except Russian River). Failure of historic timber harvest practices in respect to protection of beneficial uses has been documented numerous times for sediment TMDLs (1998-2001). THUS it is not difficult to correlate historic timber practices with the altered temperature regimes of North Coast waterbodies due to an increase in sedimentation and a decrease in shade provided by large trees.
- Data sets for these waterbodies are robust enough for listing, and thus the State and/ or EPA is obligated to list them in compliance with their duties under the CWA. Failure to do so will delay the recovery of their beneficial uses, particularly the cold water fishery beneficial use which includes species and habitat listed under the ESA. NOAA does not support the Watch List.