



Community Clean Water Institute

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March 20th, 2009

North Coast Regional Water Quality Control Board
5550 Skylane Blvd
Santa Rosa, CA
95403

Subject: 2008 Integrated Report for the 305(b) Surface Water Assessment and 303(d) List of Impaired Waters.

Dear NCRWQCB,

The proposed 2008 303 (d) list of impaired water bodies has the Russian River watershed, including Mark West Creek, to have a completed TMDL for temperature by 2019. Community Clean Water Institute feels Mark West Creek needs to become a higher priority in this listing because of its significant contribution to our drinking water source, its suitability as spawning habitat for listed salmon, and the severity of its impairment. We are requesting that a TMDL for this watershed be prepared by no later than 2011.

This watershed is a significant contributor to the drinking water supply of Sonoma and Marin County. MWC is also important habitat to federally threatened Steelhead trout and federally endangered Coho Salmon, whose populations are being adversely affected by increased sediment and elevated water temperatures.

A concerned resident who lives along Mark West Creek recently witnessed a small but exciting population of Steelhead, and even a few Coho salmon. These populations were then reported to suffer a 100 percent mortality rate and this die-off is believed to be related to lack of water and the resulting increased water temperatures.

This past summer and fall (2008), other residents along Mark West Creek reported that flow of this stream was the lowest they've seen in at least a decade. Residents have also recently witnessed stretches of this creek go completely dry, something many of them don't remember ever happening. In the past, some of these pools would remain deep enough even during the dry

months for recreational use. In fall of 2008 many of them were nothing more than dry beds of rock and sand, with occasional small stagnant puddles.

A study we conducted during the summer and fall months of 2008 on flow levels of upper MWC support these observations, which we are including with this comment.

There has been a great deal of public concern regarding existing and proposed vineyard developments along Mark West Creek, and their effects on both water quality and water quantity. Strong and organized public outcry was able to temporarily halt a construction proposal by Henry Cornell vineyards.

Henry Cornell has been attempting to acquire permits to construct a large scale winery along MWC and there is worry that this development could further deplete the already overused aquifer. There have been reports of an existing vineyard called Pride already over drafting wells and is now trucking 25,000 gallons from a day from MWC for irrigation.

It's evident that the pumping of groundwater and diversion of stream water by vineyards, along with current draught conditions, is resulting in low stream flow in MWC, to the point where this perennial stream is drying up.

Vineyards have also been accused of grading on steep slopes and causing landslides in MWC. This increased sediment is causing the siltation of important salmonid habitat pools. These vineyard developments are also replacing riparian vegetation and ridge top forest cover which leads to increased runoff and poor recharge of the watershed. Loss of canopy cover in the riparian zone, along with low stream flow and depth levels, is creating elevated water temperatures and fish are dying.

The urgency of this matter hasn't gone unnoticed. The Mark West Creek watershed has been deemed a Priority Conservation Area by the San Francisco Bay area joint agency coalition FOCUS because of its decreasing instream flows and degraded water quality.

At the rate water-loss in Mark West Creek is occurring, and the rate salmon populations and habitat are disappearing, this important source of drinking water and salmonid spawning ground may be dry and lifeless by 2019. This watershed currently needs as much protection as possible, as soon as possible, and so we ask that the Regional Board makes Mark West Creek a higher priority in the 2008 list of impaired waterways.

Sincerely,

Terrance Fleming
Kandis Gilmore
Community Clean Water Institute