651

70

Selica Potter
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

303 (d) Deadline:
1/31/06

RE: Revision of the Section 303(d) List

January 24, 2006

Position: Do Not List Noyo River for temperature

Dear State Water Resources Control Board,

I would like to share my comments regarding the proposal to list the Noyo River on the 303(d) list as being impaired for temperature. My comments may pertain to other water bodies being considered for inclusion on the 303(d) list for impaired water temperatures that are located in the northern or central coast of California.

First off I would like to state that I believe the standard being used to judge whether a water body is temperature impaired is incorrect. In the staff report prepared for this listing it indicates a water temperature of 14.8 degrees Celsius is used as an indicator of impaired for temperature or not. I believe this temperature to be too low to used as a standard for water bodies in this area and for the Noyo River in particular. The reason for this is that this standard temperature of 14.8 degrees Celsius used by the staff comes from one research report by Sullivan et. al. (2000). This study was done in the state of Washington and was not intended to nor is it appropriate to use as far south as in northern California. The fact of the matter is that salmonid's are found adapting to a variety of local conditions found in their specific ecosystems. This would include a variety of water temperatures over their ranges.

Another factor that I would like share is that I have been personally involved with the placement and collection of temperature recording instruments on the South Fork Noyo River and the North Fork of the South Fork Noyo River for the past 5 years. The areas of placement are located in Jackson Demonstration State Forest (JDSF) which is managed by the California Department of Forestry and Fire Protection. These areas are some of the least managed forestlands around and all areas along the river in these areas have a forest canopy measured at 85% or greater. Looking at the data from the last few years, which is available from the Jackson Demonstration State Forest, it is apparent that only the highest tributaries can meet the standard of a mean weekly average temperature (MWAT) of 14.8 degrees Celsius or less.

Some other data available from the Jackson Demonstration State Forest are reports from the California Department of Fish & Game which do downstream migrant trapping of fish on the South Fork Noyo River and the North Fork of the South Fork Noyo River. Some of the results of their most recent trappings shows increased populations of both Coho salmon and steelhead trout. So I looked at the years of increased populations and

the water temperatures recorded and found that the fish populations are not dependent on a 14.8 degrees Celsius water temperature which does not normally occur in large portions of this water body.

I would propose that the Water Quality Control Board does not list the Noyo River as impaired for water temperature at this time. Perhaps you could call for a study to determine what temperature the salmonid's need to succeed similar to Sullivan et. al. (2000), but done down in the watershed that are being considered. It also seems to me that a higher temperature that 14.8
degrees Celsius should be used as a standard. Looking at the temperature data from the South Fork Noyo River and the North Fork of the South Fork Noyo River, it appears that a temperature more like 16.8 degrees Celsius would be more appropriate.

Thank you for your time and attention in this matter.

Sincerely,

Robert Horvat

Robert Horvat
320 South McPherson Street
Fort Bragg, CA 95437
707-964-0685
robsuey@sbcglobal.net

Reference cited:

Sullivan, K., D.J. Martin, R.D. Cardwell, J.E. Toll, and S. Duke. 2000. An analysis of the effects of temperature on salmonid's of the Pacific Northwest with implications for selecting temperature criteria. Portland, OR: Sustainable Ecosystem Institute.