

Sebastopol, June 1, 2010

**Comments On The Draft Upper Green Valley Creek  
Watershed Management Plan, Phase 1  
Gold Ridge RCD, May 2010**

The Board of Directors of the Atascadero/Green Valley Watershed Council (AGVWC) appreciates this opportunity to comment on the Draft Upper Green Valley Creek Watershed Management Plan, Phase 1, prepared by Gold Ridge Resource Conservation District (GRRCD), and its partners, Reza Environmental Consulting, Prunuske Chatham, Inc., and the Center for Ecosystem Management and Restoration.

This is a well-written report that gives the reader a comprehensive overview of many ills from which the watershed suffers. It contains a number of hard-hitting truths that ten years ago would not have been found in documents of its kind.

The frankness of this report is refreshing and we applaud the GRRCD and its partners for confronting us with these uncomfortable truths. When in the following we make a number of comments on this draft we hope they will be taken in the spirit of constructive criticism on what is called a living document; they do not take away from our appreciation of the many good points the draft contains.

This plan has two goals: i) the restoration of Coho salmon and ii) the preservation of sustainable agriculture in the target area.

In the Executive Summary, we support goal 1: Wild populations of Coho salmon and steelhead trout return to the UGV Watershed. Goals 2 – 6 are necessary components of goal 1, sub-goals without which the overarching goal of having a sustainable population of native Coho and steelhead in our watershed cannot be reached and maintained.

However, we believe that the preservation of sustainable agriculture cannot be a goal of a plan like this. This confuses a goal with a solution path towards the goal.

The preservation, or establishment, of sustainable agriculture in our watershed may be part of a solution path but cannot in itself be a goal of this management plan, which in the words of the funding agency, the State Coastal Conservancy, says: "The Authorization to disburse up to \$125,000 to the Gold Ridge Resource Conservation District to assess limiting factors for salmonids, conduct landowner outreach and prepare an integrated watershed plan to improve anadromous fish habitat in Green Valley Creek, tributary to the Russian River, in western Sonoma County."

In other words, if goal 7, at the completion of this plan, were the only "goal" that was reached by the plan's implementation, we would call this a failure, not a partial success.

Funding sources for this project will, with a few exceptions, derive from the various listings of salmonids under the Endangered Species Act and will not be directly concerned with preserving sustainable agriculture.

This is not merely a quibble about words. Confusing a solution path with a goal will easily lead to goal drift, especially in an area with considerable financial landowner interests and a veritable army of contractors who are looking for work. We need to stand firm here that Coho recovery is the only goal of this plan.

Where we accept improving the sustainability of our agriculture as a part of a solution path towards the goals of salmon recovery we need to emphasize that the definition of sustainable agriculture in the draft is far too restricted.

A sustainable agriculture is a diversified agriculture, a multi-crop agriculture, a multi-strain agriculture, an agriculture that uses Integrated Pest Management and stays away from using pesticides and herbicides, especially where it may affect surface and ground water quality and beneficial insects; an agriculture that tolerates forests on the uplands and keeps a good distance from the streams. In other words,

agriculture is not sustainable if it overtaxes renewable resources, depletes nonrenewable resources, such as aquifer capacity, threatens nature's services and overburdens nature's sink capacity.

You could engage as partners the wide variety of civic organizations and businesses, such as Community Alliance with Family Farmers, Slow Food (the Gravenstein Apple, an endangered apple variety is part of the Ark of Taste project), the El Molino High School Environmental Program, Future Farmers of America, Occidental Arts and Ecology Center Water Institute, Rare Fruit Growers, Community Supported Agriculture in the area, Green Valley Village, and Redwood Hill Farm, that support sustainable agriculture in our watershed.

Hence we like to see IPM and pesticide and herbicide water monitoring added to the list of recommendations on page 33-34, as related to Water Quality.

Besides sustainable agriculture as a solution path we also like to see that residents in general are supported in their desires to live sustainably and that all efforts will be made to inform and engage them in making our watershed a place where salmonids will return.

We find the list of "Rural Residential Management Measures" on page 100 lacking in that regard. It seems just another listing of tried and tired measures that have failed to make a dent in the past. We like to see a program that really engages the watershed community, and appeals to its love of nature, its love of the land; a plan that has, if we may say, a spiritual dimension. What can you add to that list of "Residential Management Measures" that will inspire truly sustainable measures, and what members do you need to add to your team to actually reach our goals? Walking the land together, and a community effort to keep creeks and roadsides free from plastic, bottles, and other debris are simple but effective first steps to get folks engaged.

The lack of water in the creeks in times of the year that are critical to fish survival, and the quality of the little water there too often is, are in our opinion the dominant limiting factors that need immediate attention. Work can start now, and should not wait for the results of further studies. We know enough to start now, and further monitoring and studies can correct our management as we go along.

Even though you make some hard-hitting remarks about the state of Upper Green Valley Creek/Purrington Creek sub-watershed, and about some of the cause-effect relations, we are missing in the management plan a sense of urgency and the resolve that is needed.

It does not give us confidence that the only concrete, shovel-ready projects you list (BOMA1, RIER2, BOMA2, all on page 62) are sediment projects. (Table 1., the Implementation summary on page 109 was not yet completed on the on-line document by June 1, 2010, the date of submitting these comments.)

We like to see a more thought-out strategy, and greater prioritizing, that emphasizes maintaining and enhancing natural summer flow, maintaining and enhancing year round water quality, and maintaining and enhancing a riparian corridor, off-limits to construction and agricultural activities.

The plan emphasizes the importance of strong landowner commitment. But we like to see more strategic attention to the fact that working with some willing landowners to improve summer flow is to no avail if along the same stream other landowners remain unwilling. The same holds for other types of restoration. Strong commitment from an individual landowner is not sufficient. We need to be looking for commitment of all the adjacent landowners that make up a self-contained area for project purposes. We believe that for this reason a firm enforcement of the law and of regulations remains a necessary precondition for the success of the management plan.

In this Upper Green Valley Creek Watershed Management Plan, it struck us that the term “Upper Green Valley Creek Watershed” is used both for the whole management area and for a part of that area (the part that does not include Purrington). We find this confusing.

We believe that there is a difference between human needs and human wants, and that the failure to make this distinction, and the failure to question our wants, is a limiting factor for fish recovery in the watershed. So when you speak on page 48f of “Calculating Water Needs,” are you not really talking about water wants? We can only assess of our actual water needs by engaging the community in the management plan.

Although you mention on page 111 the Sonoma County Open Space and Agricultural Preservation District as a funding source for land acquisition, for purchasing development rights and easements, public acquisition does not occur in your recommendations. We wish to add it as a recommendation to Section B (Water Quality), on page 33, section C (Flow), on page 49, and section D (Sediment), on page 60. Section E (Flood Risk), when it gets its share of recommendations, should also include public acquisition. In fact we believe that the whole riparian corridor, not just the streambed up to the high water line, is best kept in the public domain.

We trust that we will continue working with GRRCD to realize our common vision for the watershed.

Sincerely,

Zeno Swijtink  
President  
Atascadero/Green Valley Watershed Council