

Liz Lewis
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Re: **San Geronimo Valley Salmon Enhancement Plan – Draft 7/22/2009**

Dear Liz:

Marin Conservation League (MCL) previously submitted a letter of comment on the Draft Salmon Enhancement Plan (SEP) for San Geronimo Valley. We also attended the public meeting on October 15 at Lagunitas School. Given the extended period, we wish to reinforce some of our previous comments.

1. Voluntary Action is Not Enough. We continue to feel that the SEP relies too heavily on voluntary action. The Valley community has a deserved reputation for environmental concern and cooperation; it is also a community of individuals. Even the high environmental awareness that exists among residents cannot ensure equitable concern or investment in restoration among property owners. Voluntary action can be rewarded by incentives, but it must also be supported by a two-part commitment by the County: 1) to implement policies already contained in the Countywide Plan 2007; and 2) to enact or strengthen ordinances that are specific to the needs of stream habitat restoration and long-term maintenance.
2. Ordinances should be simple but enforceable. Property owners who willingly cooperate need to be “rewarded” with permit procedures that are clear and understandable, relatively easy to carry out, not too costly, and consistently enforced. The SCAs are most critical to protection of salmonid habitat and require the first level of enforcement. The proximate causes of cumulative impact include permitted as well as unpermitted (illegal) structures such as coops, sheds, landscape features, etc., within SCAs. These latter should be given HIGH priority and targeted for removal wherever possible, using incentives to encourage removal. However, activities that are currently permitted in an SCA – walls, driveways, decks, tree removal, parking surfaces, cultivated gardens, etc. – are also cumulative in their impact on the stream environment. An expanded SCA ordinance should lower the discretionary permit threshold for uses that are currently allowable (Action 6). The SCA Ordinance should be strengthened by a new Riparian Tree ordinance that maintains native vegetation from top of bank upland and redefines allowable uses within a minimum 45-foot buffer (even 45 feet is too limited for fully protective functions). An effective Riparian Tree Ordinance would implement SEP Recommended Actions 1 and 3 in particular.
3. Actions to Improve Watershed Functions Should Receive High Priority To distribute responsibility more equitably, land uses throughout the watershed that produce excess runoff carrying suspended sediments and other pollutants should receive high priority for action. The cited 2007 Countywide Plan (CWP) policy CD-1.1 that directs future land use to appropriate urban areas away from San Geronimo valley does not address existing conditions throughout the watershed that affect rate and volume of runoff, infiltration, groundwater resources, and the quality of surface waters. Action 15 captures the basic need to capture and retain surface water and disconnect stormwater runoff from waterways. Greater detail is provided by Action 16 (septic system repair), Action 17 (proper disposal of toxic materials), Action 18 (fine sediment control), and Action 20 (protection of springs and groundwater resources). In our estimation,

these are all deserving of HIGH priority. Although addressed to a degree by 2007 CWP Policies WR-1.1, 1.2, 1.3, and WR-2.1, 2.2, and 2.3, and BIO-4.20 (reduction of impervious surfaces), the mechanisms and responsibilities for implementing these policies (and recommended actions) need to be clearly defined as to responsibility and enforceable mechanisms.

In addressing *new* development in the Valley, the development code should be revised to require that there be no net increase in runoff, as recommended in Action 15 (including methods illustrated in Appendices H and I). This action also is supported by the 2007 CWP Policies: BIO-18 (Promote the use of permeable surfaces when hardscapes are unavoidable), and BIO-20 (Minimize runoff).

Thank you for the opportunity to expand on previous comments.

Sincerely,

Nona Dennis, President