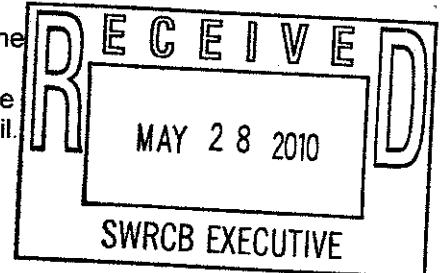


From: Jonathan Ambrose <Jonathan.Ambrose@NOAA.GOV>
To: <commentletters@waterboards.ca.gov>
Date: 5/28/2010 10:08 AM
Subject: San Vicente Creek delisting

The National Marine Fisheries Service, Protected Resources Division, North Central Coast Office, has just learned of the State Water Resources Control Boards (SWRCB) Notice of Opportunity to Comment on the Proposed 2010 Integrated Report: Clean Water Act Section 303(d) List of Water Quality Limited Segments and Clean Water Act Assessment of Surface Water Quality. As such we have only had time to provide comments via email.



The SWRCB Staff Report indicates that State Water Board staff recommended to change the decision for Sedimentation/Siltation from Do Not Delist to Delist based on information provided by staff of the Central Coast Water Board for San Vicente Creek in Santa Cruz County, California. Upon a review of data supplied by Santa Cruz County Environmental Health Services cited in the report we cautiously concur with staff findings regarding the available data regarding NTU exceedance in San Vicente Creek. However, we recommend a precautionary approach and suggest that further data collection is necessary prior to delisting San Vicente Creek based, in part, on the following:

- * The source location for the water diversions used for the data measurements occur in stream reaches located in areas upstream of anadromous fish habitat. It is likely that within the anadromous stream reaches actual turbidity measurements may be higher. Turbidity measurements in the actual affected anadromous salmonid stream reaches (during the winter period) is appropriate when evaluating turbidity exceedances. It is likely that the available turbidity data do not reflect actual turbidity levels further downstream.
- * San Vicente Creek was designated as a key watershed in the March 2010 public draft of NMFS' Central California Coast Coho Salmon recovery plan. Only 28 of 77 historical CCC coho salmon watersheds were so designated and we recommend approaching delisting in each of these watersheds with heightened diligence and caution. San Vicente Creek is of particular importance for CCC coho salmon and it is one of the very few watersheds south of San Francisco Bay with an extant coho population. As such San Vicente's role in coho recovery was elevated and is considered a Core watershed where we recommend increased focus on enforcement, restoration, and recovery actions. NMFS, California Department of Fish and Game, the NOAA Restoration Center, the Santa Cruz County Resource Conservation District and others have expended considerable time and resources in San Vicente Creek to restore and enhance coho salmon habitat in this watershed. Coho salmon south of San Francisco Bay are close to extirpation and restoration of properly functioning watershed conditions in San Vicente Creek is critical to guard against possible extirpation south of the Bay. Based on this importance, the resources agencies consider San Vicente the top priority watershed for immediate future restoration actions in an effort to prevent coho extirpation.

* Excessive rates of sedimentation is a major concern of the resources agencies in San Vicente Creek. Considerable efforts have been made to dredge an off channel pond that filled in with sediment which provides superior coho salmon rearing habitat. As you are aware, turbidity often serves as a proxy for sedimentation when evaluating pollutants.

Thank you for your time and consideration.

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