# Friends of the Napa River

68 -B Coombs Street, Napa, CA 94559
Phone 707-254-8520
www.friendsofthenapariver.org
info@friendsofthenapariver.org



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**State Water Resources Control Board**
**Charles R. Hoppin, Chairman**
**Attn Jeanine Townsend, Clerk to the Board**
**POB 100, Sacramento CA 95812**

Via Email: commentletters@waterboards.ca.gov

***Re: Amendment to the Water Quality Control Plan for the San Francisco Bay Region to establish a Total Maximum Daily Load (TMDL) for Sediment and related Habitat Enhancement Goals in the Napa River Watershed***
***Resolution No. R2-2009-0064***

Dear Chairman Hoppin,

We read Resolution No. R2-2009-0064 and the accompanying text for the Napa River watershed to be inserted into Chapter 7, Water Quality Attainment Strategies including Total Maximum Daily Loads (TMDLs).

Friends of the Napa River (FONR) commented on the original amendment in August 2006; on January 23, 2007, the Water Board took action to adopt a Basin Plan amendment. Subsequently, staff made changes to the amendment, for which we submitted comments on July 21, 2009.

We understand the purpose of this amendment it to explain where the target values for sediment came from. We welcome the inclusion of implementation (compliance) monitoring, effectiveness monitoring, and an economic analysis. Notwithstanding some observations and comments (below), we find that Resolution No. R2-2009-0064 generally supports the goals of FONR and provides for monitoring the watershed to improve steelhead and salmon populations.

Thanks for the opportunity to review this document.

Sincerely,

Bernhard Krevet
President, Friends of the Napa River

(signed)
Roger Hartwell
FONR Advisory Board

## Resolution No. R2-2009-0064

**(A) Observations:**

The document supports much monitoring of the fisheries, watershed, and related activities in the coming years. There are targets and planning goals that extend out as far as 17 years, which is better than most other plans except for public utilities planning documents (often 50 years). The planning horizon should be much longer, but this is an improvement. Also, the existence of adaptive management, compliance monitoring (called implementation monitoring in the document), and effectiveness monitoring is probably required by the EPA. These elements are standard in most ESA-related federal documents, since they include review by NOAA (NMFS) and USFWS.

FONR appreciates the proposed activities for habitat enhancement, protection of base flows, fish passage improvement, and water temperature improvement). In Table 5.2 (page 3965) the action "Install and maintain dial-up water-level gage programs and implement public education program in 10 key tributaries for steelhead" is vital to success. Such real time monitoring compiles databases that quickly accrue and continue to assist in future watershed management. Further on down the Table 5.2 column Action 2.4 reads "Conduct water rights compliance survey to protect fish and water rights." This directive, among other actions, requires monitoring of illegal riparian users along the Napa River. This task very rarely gets done on most watersheds, and riparian users only increase as time goes on. It does protect water rights because those with true water rights are able to fulfill their legal allotments. It also protects fish because these illegal riparian users rarely if ever screen their intakes, a situation that can impinge or entrain Chinook salmon and steelhead fry (which in their smallest and most vulnerable life-stage rear along the river margins where illegal intakes most often occur).

**(B) Comments:**

We have no specific negative comments on the Resolution, but have a few comments on accompanying text to be inserted into Chapter 7 (i.e., a part of the Resolution).

**Page 3961, Table 4.2:** [Grazing] Performance Standards: "minimal residual dry matter [RDM] values consistent with University of California Division of Agriculture and Natural Resources Guidelines." Reference given (Publication 8092, Table 2) suggests RDMs for grazing on slopes of 20-40% and even >40%. To meet this TMDL, no cattle grazing should be allowed on slopes greater than 30%. Also, all RDM values should be for *minimum* measurements. Measuring "Average RDM values" can result in cattle distribution problems that render some areas virtually devoid of vegetation and therefore subject to erosion from rainwater striking bare ground (the most erosive of all natural physical processes). Such a scenario is a direct conflict to a TMDL for the Napa watershed. Cattle distribution problems should be monitored and adaptively managed; and movements of salt licks, molasses stations, and watering troughs should be changed if distribution problems occur (i.e., cattle affect or denude one area, though the average RDM is acceptable). If livestock continue to denude areas, allowable RDM levels should be adjusted significantly upwards (e.g., 140% of UCDA levels, as in The East Bay Watershed Master Plan (EBMUD, 1996)).

**Page 3962, Table 4.3,** [Rural Lands] Performance Standards "Roads. Road-related sediment delivery to channels ≤500 cubic yards per mile per 20-year period." A footnote is needed here to show source of methodology for this measurement.

**Page 3963, Table 4.4**, same comment as for page 3962.

**Page 3970, paragraph 2, line 3**: insert "age" between run-size and genetic structure. It is important to discern the age of Chinook salmon since in California they can return to spawn at 1, 2, 3, 4, or 5 years. Most Chinook salmon escapement occurs at 3 years, but many at 2 and some as late as 5.

**Page 3970, paragraph 2 lines 4-9**: text suggests at least five years of monitoring (2 current plus 3 more). This period is too short to show oscillations in the salmon population. Fall-run Chinook salmon on the Sacramento River and associated drainages have longer periods of oscillation, and a picture of the population cannot be obtained without at least one of these full cycles monitored (e.g., 10-12 years – see attached Fall Run Chinook Salmon population figure from Miyamoto & Hartwell, 2001).

**Page 3070, end of Paragraph 2:** emergence trapping is not as effective as smolt trapping. Emergence trapping is also subject to vandalism when attempted in a highly traversed and populated area like the Napa Valley. If it is attempted, significant (and likely expensive) site security must be budgeted. Sufficient relationships have been established in other systems for fry emergence based on degree-days, % fines, and average intergravel flow and can be used as a surrogate for emergent trapping; so the cost-to-benefit in the Napa River may be too high to be practical. Accurate redd counts and smolt trapping in successive years will go far to determine Chinook salmon success. If emergent trapping must be done, the field personnel for these difficult tasks must show a history of similar successful studies on other watersheds with related published papers in refereed journals. It is a difficult task and those who implement it should have no procedural learning curve.

**Page 3070, end of Paragraph 4:** "d) relative abundance of native and introduced fish." "introduced fish" should specify striped bass (*Morone saxatilis*) (predation on smolts in tidal reaches) and green sunfish (*Lepomis cyanellus*) (predation on fry between Mill Creek and Soda Creek). Sacramento pikeminnow (*Ptychocheilus grandis*), a native species, prey on salmonid fry but are less numerous, have evolved with them, and side-by-side comparisons with the non-natives do not suggest as much of a threat.

References

East Bay Municipal Utility District. 1996. East Bay Watershed Master Plan. East Bay Municipal Utility District, Oakland, CA. Prepared by Jones and Stokes Associates, Inc.

Miyamoto, J. and R. Hartwell. 2001. Population trends and escapement estimation of Mokelumne River fall-run chinook salmon (*Onchorhynchus tshawytscha*). Fish Bulletin 179(2):197-216.