



Salmon Protection And Watershed Network

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TO: MARIN COUNTY SUPERVISORS

FR: Todd Steiner, Director, Salmon Protection And Watershed Network

RE: Robertson Development Appeal

Dear Supervisors:

We appreciate the opportunity to comment today on behalf of the thousands of SPAWN supporters throughout Marin and the Bay Area.

We support the Planning Commission's decision to deny approval of this development and recommend you do the same. We are in agreement that this development is not in character with the rural nature of the San Geronimo Valley in general, and the Arroyo Road neighborhood in particular.

Furthermore, we believe this proposed development, as well as future development in the Lagunitas Creek Watershed, which is home to the largest remaining documented population of wild coho salmon in the State of California can not be supported by mere "Negative Declarations" because the County has to date, refused to undergo the proper environmental review that would inform rational science-based decisions of balancing the survival and recovery of three endangered fish species with human habitation.

I will focus my comments specifically on the most endangered of those species, the Central California Coast coho salmon. Coho have been extirpated from 90% of all streams in California and almost all streams in Marin County.

To state it simply, this species **does not** co-exist with Suburbia.

Fortunately, the residents of San Geronimo Valley also do not want to live in Suburbia and have said so legally in the San Geronimo Valley Community Plan, approved by the Marin County Supervisors. This document declares that the protection of the rural character of the Valley is paramount to maintaining a healthy community that we wish to steward. Furthermore, this document specifically states that the protection and recovery of coho salmon is another critical aspect of maintaining and sustaining a healthy community that we wish to live in and pass on to future generations.

So how have coho and humans happen to exist in some parts of Marin County, where they have been pushed to extinction almost everywhere else?

Where coho still exist in Marin (and other regions) are in areas where significant portions of their habitat are protected in National and State lands. In the case of the Lagunitas Watershed, this is true, but with one simple caveat. The headwaters of the most significant un-dammed portions of the watershed, the San Geronimo Valley, is also home to the largest human population in West Marin.

SPAWN and Marin Municipal Water District data have documented that 50 percent or more of the coho which spawn in the entire 100 square mile Lagunitas Watershed spawn in the tiny nine square mile San Geronimo Valley sub-watershed. Our first year of outmigrant studies showed that 1/3 of the juveniles spend their entire fresh-water lives in the San Geronimo Valley before migrating out to sea. We suspect that this year's data, which is not yet analyzed, will actually increase that percentage.

While this may be a surprise to some, biologists are quite clear in their understanding that coho have adapted over hundreds of thousands of years of evolution to use small headwater streams of their watersheds, just like those found in the San Geronimo Valley.

The Robertson property is a significant portion of the headwaters of the Arroyo Creek sub-watershed, the second most important spawning and rearing tributary in the San Geronimo Valley. To put this in perspective, the approximately 1.5 square mile Arroyo Creek sub-watershed supports more coho today than the entire 1,485 square mile Russian River Watershed. All of the impacts from this proposed development on this property, even after mitigations to minimize those impacts, will run into Arroyo Creek located a few hundred feet from the proposed 8,400 square foot driveway of this development.

While we may pat ourselves on the back about having the largest coho population left in the State, this is a population teetering on the brink of extinction. Only 190 to 600 females now return annually, estimated to be the last ten percent of the historical population. Fifty percent of the Lagunitas Creek Watershed's physical habitat have been taken from the fish by dams that supply our drinking water, and all that water that keeps Marin lawns green in the summer once provided the life-blood for a healthy and vibrant coho population.

Currently 38% of the 2,150 parcels in the San Geronimo Valley have been clustered directly along the creek banks within the Streamside Conservation Area, the most biologically diverse region of the Valley, removing significant portions of the riparian zone that is critical to their survival. Septic systems, both working and failing, add nutrients and pathogens to our waterways. Another very significant emerging threat, pharmaceuticals excreted with our human wastes, are being detected in waterways wherever testing for them has occurred. More studies are coming on line everyday that show these excreted chemicals are poisoning our waterways. For example, the active ingredient in birth control pills are not being broken down by wastewater treatment systems, and this chemical is feminizing fish and threatening populations with extinction.

Current zoning in the San Geronimo Valley will allow the number of residences to grow by another 1/3, while the current highly inadequate controls in place allow residents to pave entire riparian areas, increase erosion and run-off, and cut down all of their riparian trees, all

legal under current Marin County rules. Meanwhile, as exemplified by the Robertson proposal, new homes and their development footprint and their associated negative impacts continue to dwarf the more modest-sized houses of the past that have allowed coho and humans to coexist. When you add these impacts to those associated with the failure of the County to enforce the (inadequate) regulations that do exist, I assure you we are not on a sustainable path forward that will sustain coho and humans.

All of these and the many more human impacts that emanate from the San Geronimo Valley do not just effect the fish in the Valley, but flow downstream into Samuel P. Taylor State Park, Golden Gate National Recreation Area administered lands, Tomales Bay and its associated State and National Marine Sanctuary waters.

Based on our own scientific understanding, and based on the opinion of the many scientific and legal scholars whose opinions we have solicited, we continue to believe the County must take the responsibility to understand the limits to habitat fragmentation, the impacts of human activities on hydrological processes, input of nutrients, sediment, pathogens and toxics BEFORE it continues to approve one development at a time and pretend to determine that individually each of these impacts are insignificant. Under the California Environmental Quality Act, this responsibility is referred to as “cumulative impacts,” which must be considered in the environmental review process.

While I may run the risk of sounding like a broken record to you, repeating each and every time another development impacting the critically endangered coho comes before the Planning Commission and the Board of Supervisors that a cumulative impact analysis must be conducted, I am hopeful that the message will get through—one way or another. I can assure you SPAWN has much more lasting power than the energizer bunny.

There are some more animal metaphors, which also describe the phenomena we continue to, see each and every time we address this issue before you. What we see are: “ostriches with their head buried in the sand;” while your decisions keep piling more and more “straws on the [proverbial] camel’s back” that we believe will surely eventually break, if decisions continue to be made in the dark without meaningful and proper environmental review.

The decision of this Board of Supervisors impacts more than the economic interests of Mr. Robertson. It impacts the interests of the tens of thousands of Marin residents who come to see and enjoy the magnificent coho which spawn here every year, and the interests of the entire nation that has and continues to invest millions of tax dollars annually in the recovery of coho salmon. And if we succeed in recovering and restoring salmon here, combined with other efforts in other places, maybe someday we will once again have commercial and recreational salmon fishing that nourish individuals and sustain whole coastal communities.

You may prefer to dismiss our concerns and label us obstructionists, but the truth is that SPAWN is prepared to roll up our sleeves and help the County move forward with an agenda for the future. We are more than willing to help you develop a plan to save our coho from extinction, including developing science-based County ordinances that protect the species and the legal rights of landowners, as well as a scoping document for a cumulative impact study to guide us in balancing the needs of these endangered species with the humans who share this incredible watershed with them.

I appreciate your attention.

Thank you,