



Sonoma County Water Coalition

55 Ridgeway Avenue, Santa Rosa CA 95401
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September 19, 2007

Sonoma County Board of Supervisors
575 Administration Drive,
Santa Rosa, California 95403

Re: **Comments on the Biotic Resources section of the draft General Plan Update**

Dear Members of the Board of Supervisors,

We thank you for the opportunity to comment on the draft General Plan Update (GP2020). The Sonoma County Water Coalition (SCWC) now includes 32 organizations representing more than 25,000 citizens. The unifying momentum behind this coalition is a shared concern for the water resources of Sonoma County.

Properly functioning riparian corridors protect the beneficial uses of water including habitat for fish and wildlife in and adjacent to waterways. These areas also perform many vital hydrologic functions, including flood control and streamside groundwater recharge in many parts of Sonoma County, especially where they support healthy native vegetation and maintain topsoil. Additionally, they are a key component of the water cycle, allowing water to be naturally purified as it recharges our aquifers every winter. Our habitat is just as fragile as that of other creatures with whom we share this planet, and that in many cases the health of our habitat depends on the health of theirs.

Many of the streams (including the Russian River and all of its tributaries) in Sonoma County are subject to improperly functioning riparian areas and are listed as impaired on the California State list of impaired water bodies.

We urge you to adopt policies in the Open Space element of GP2020 that protect and re-establish riparian zones with healthy native vegetation within Sonoma County. Other than the Russian River, which needs streamside conservation areas of 200 feet measured from the top of the bank on each side of the stream, all perennial and intermittent streams shown on USGS 7.5 minute quadrangle topographic maps in rural areas should have 100 foot streamside conservation areas, in which uses are limited and native vegetation is encouraged. These streamside conservation areas along each side of these streams may be reduced to 50 feet for agriculture, with a further reduction to not less than 25 feet, if riparian function maintenance can be demonstrated through a ministerial process at PRMD.

Members: * Atascadero/Green Valley Watershed Council * Russian River Watershed Protection Committee * Community Clean Water Institute * Friends of Mark West Watershed * O.W.L. Foundation * SWiG (Sebastopol Water information Group) * **Supporting Organizations:** Bellevue Township * Blucher Creek Watershed Council * California Native Plants Society: Milo Baker Chapter * Coalition for a Better Sonoma County * Coast Action Group * Coastal Forest Alliance * Community Alliance with Family Farmers (N.Coast Chapter) * Earth Elders of Sonoma County * Forest Unlimited * Forestville Citizens for Sensible Growth * Friends of the Eel River * Friends of the Gualala River * Graton Community Projects * Laguna Lovers * Madrone Audubon Society * Mark West Watershed Alliance * Occidental Arts and Ecology Center * Petaluma River Council * Russian River Advocates * Russian River Chamber of Commerce * Sierra Club (Sonoma County Group) * Sonoma County Conservation Action * Town Hall Coalition * Western Sonoma County Rural Alliance *

It has been indicated to us that such a ministerial process may be workable.

We offer the above suggestions to you as a way to simplify the challenging requirement to differentiate between flatland and other corridors included in the draft GP2020 sent to you by the Planning Commission.

Additionally, recognizing that natural habitat is site specific, watershed groups representing all stakeholders may be formed to draw up specific plans for their own watershed which would include streamside conservation areas with a minimum setback of 25 feet in which riparian functions are protected and re-established.

Our proposal would presuppose that protections for riparian corridors in urban areas remain unchanged from the 1989 General Plan.

Please refer to the following documents:

"Riparian Setbacks: Technical Information for Decision Makers"
http://www.crwp.org/pdf_files/riparian_setback_paper_jan_2006.pdf;

"Riparian Buffer Width, Vegetative Cover, and Nitrogen Removal Effectiveness: A Review of Current Science and Regulations",
<http://www.epa.gov/ada/download/reports/600R05118/600R05118.pdf>;

Basin Plan for the North Coast;

Regional Water Quality Control Board Comment on GP2020;

An Ecosystem Approach to Salmonid Conservation, B. Spence, G. Lomnickey, R. Hughes, R. Novitzki, for Management Technology (MANTECH), 1996.

Thank you for your consideration. Please do not hesitate to contact the Sonoma County Water Coalition if we can assist you in this very important endeavor.

Sincerely,

Stephen Fuller-Rowell
Sonoma County Water Coalition