



SIERRA CLUB MARIN GROUP

Box 3058 San Rafael CA 94912 sanfranciscobay.sierraclub.org/marin
/o Gordon Bennett 40 Sunnyside Dr Inverness CA 94937 415-663-1881/gbatmuirb@aol.com

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Community Development, Curtis Havel
3501 Civic Center Dr, San Rafael, CA

Re: Pine Gulch Creek Watershed Enhancement Project

The Sierra Club, on behalf of its 7,000 Marin County members supports this Project in concept as an appropriate balance between fishery and agriculture. We do offer the following comments/questions:

Table 2.1 Water Efficiency Question Fresh Run Farm's proposed 20.5 AF pond is designed to irrigate 22.5 acres, or .91AF / acre. Paradise Valley (New Land Trust) Farm's proposed 5.5 AF pond is designed to irrigate 10 acres, or .55AF / acre. Star Route Farm's proposed 25.4 AF pond is designed to irrigated 29 acres, or .88 AF / acre. Question: why is the water efficiency of Star Route and Fresh Run so much lower than that of New Land Trust?

Sec 2.2: Include Gospel Flat and Las Baulines Nursery It appears that "an irrigation plan has been developed for the Gospel Flat parcel that would... pump from the shallow groundwater table" and "with minor support, could be constructed." We believe that such a project could help resolve agricultural problems of drowned roots at Gospel Flats as well as reduce direct riparian withdrawals. Thus we urge that that "minor support" be provided as part of this Project for groundwater pumping for Gospel Flats and Las Baulines Nursery.

Sec 3.1.2 Floodplain Protection The third paragraph notes "the stream flooded out on to the fields in Star Route Farms and around the Gospel Flats property...During high flows of 1997-1998, the bed of the creek aggraded approximately two feet." This points out that there is not only value in Pine Gulch Creek water to fish and agriculture but also value in the Pine Gulch Creek floodplain as a natural interceptor of agriculturally fertile sediment. Therefore, this Project should consider whether either the location of the proposed ponds or the possible expansion of irrigated acres would impact the ability of the creek to overflow onto these fields. Lastly, consideration should be given to means to insure the creek can continue to use its floodplain on these farms.

Sec 4.3.4 Alternate Dry Year Scenario The proposed project requests that "some limited riparian withdrawals during periods where streamflow was below minimum bypass flow requirements should be considered." However, the example provide was 2001, yet the Project contemplates a subsequent 33% increase in irrigated acres. We understand that such expansion, if done, would be accomplished with the same amount of water that is estimated to be currently used. Nevertheless, consideration should be given to other dry-year options such as simply eliminating this request or limiting the applicability of this request to current irrigated acreage with mandatory monitoring.

Water, Food, and Shelter The proposed Project appears to be a good-faith effort to protect a minimum flow of waters in Pine Gulch Creek for the benefit of salmon; however, nothing is mentioned about protection of the riparian areas needed for salmon food and shelter. Present agricultural policies in Marin do not protect what should be a riparian buffer from being used instead for agricultural purposes. As noted, these proposed ponds are designed to allow a 33% increase in irrigated acreage. But it should not be the case that an effort to protect the water for the fish also encourages the destruction of food and shelter for the fish. Agricultural groups in Napa, Sonoma and Mendocino Counties support a voluntary Fish-Friendly Farming program that requires a minimum agricultural setback from the bankfull edge equal to 1.5 times the creek's bankfull width. The Sierra Club suggests that farmers who express the wish to farm sustainably and share water resources with the salmon should similarly share other riparian resources and voluntarily adopt the Fish-Friendly Farming practices.

Sincerely,

Gordon Bennett, Chair