RUSSIAN RIVER ESTUARY MANAGEMENT PROJECT

Final Environmental Impact Report

Prepared for
Sonoma County Water Agency

July 2011

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CHAPTER 1
Introduction

1.1 Project Background

The Sonoma County Water Agency (Water Agency), as Lead Agency, has prepared this Final Environmental Impact Report (EIR) for the proposed Russian River Estuary Management Project (Estuary Management Project or proposed project), in accordance with the provisions of the California Environmental Quality Act (CEQA) of 1970, codified as California Public Resources Code Sections 21000 et. seq., the State CEQA Guidelines in the Code of Regulations, Title 14, Division 6, Chapter 3, and the Water Agency's Procedures for the Implementation of CEQA. The EIR is a public document for use by the Water Agency, other governmental agencies, and the public in identifying and analyzing the potential effects on the environment and mitigation measures to lessen or eliminate adverse impacts, and examining feasible alternatives to the proposed project.

The Russian River Estuary (Estuary) is open to the ocean tides for much of the year. At certain times, the natural formation of a barrier beach[1] across the mouth of the Russian River cuts off the tidal connection between the ocean and the Russian River and creates a lagoon.[2] The Estuary may close at any time of the year, although the closures occur most often during the spring, summer, and late fall. Closures result in increasing water levels in the Estuary behind the barrier beach and an increase in the risk of flooding low-lying properties (SCWA, 2009). Natural breaching of the barrier beach occurs when Estuary water levels exceed the capability of the barrier beach to impound this water, causing localized erosion of the barrier beach and creating a tidal channel that reconnects the Russian River to the Pacific Ocean. Historically, private citizens breached the barrier beach, enabling the river to flow into the ocean, in an effort to avoid flooding. In the 1960s, the Sonoma County Public Works Department began carrying out breaching, using heavy equipment. After a county reorganization in the mid-1990s, the Water Agency began to perform activities related to breaching the barrier beach. Currently, the Water Agency artificially breaches the barrier beach when the water surface level in the Estuary is between 4.5 and 7.0 feet above mean sea level, as determined by the gage at the Jenner Visitor's Center, in accordance with the *Russian River Estuary Study 1992–1993* (Heckel, 1994). Artificial breaching occurred every year between 1996 and 2009, except 2006. A detailed description of artificial breaching activities is provided in Chapter 2.0, Project Description.

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1 For the purposes of this project, the term barrier beach is used to describe closed sandbar conditions, consistent with National Marine Fisheries Service (NMFS) terminology.

2 A lagoon is formed when a barrier beach restricts tidal exchange in the Estuary.

In September 2008, the National Marine Fisheries Service (NMFS) issued the *Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed* (Russian River Biological Opinion). [3] The Russian River Biological Opinion is a culmination of more than a decade of consultation between the Water Agency, the U.S. Army Corps of Engineers (USACE), and NMFS regarding the impact of the Water Agency's and USACE's water supply and flood control activities on three fish species listed under the federal Endangered Species Act: Central California Coast steelhead, Central California Coast coho salmon, and California Coastal Chinook salmon. The California Department of Fish and Game (CDFG) issued a consistency determination on November 9, 2009, finding that the Russian River Biological Opinion was consistent with the requirements of the California Endangered Species Act (CESA) and adopting the measures identified in the Russian River Biological Opinion.

The Russian River Biological Opinion concluded that the continued operations of Coyote Valley Dam and Warm Springs Dam by the USACE and the Water Agency in a manner similar to recent historic practices, together with the Water Agency's stream channel maintenance activities and Estuary management, are likely to jeopardize and adversely modify critical habitat for endangered coho salmon and threatened steelhead. The Russian River Biological Opinion found that artificially elevated inflows to the Russian River Estuary during the low flow season (May through October) and historical artificial breaching practices have significant, adverse effects on the Russian River's estuarine rearing habitat for juvenile salmonids, particularly steelhead. The historic method of artificial breaching, which is done in response to rising water levels behind the barrier beach, creates a tidal marine environment with shallow depths and high salinity. The Russian River Biological Opinion concludes that the combination of high inflows and breaching practices impact rearing habitat because they interfere with natural processes that would otherwise cause a freshwater lagoon to form behind the barrier beach. According to NMFS, fresh or brackish water lagoons at the mouths of many streams in central and southern California often provide depths and water quality that are highly favorable to the survival of rearing salmon and steelhead.[4]

The Russian River Biological Opinion requires the Water Agency to collaborate with NMFS and the CDFG and to modify Estuary management in order to reduce marine influence (high salinity and tidal inflow) and promote a higher water level in the Estuary (formation of a fresh or brackish water lagoon) from May 15 to October 15 (referred to hereafter as the "lagoon management period"). Conditions in a fresh or brackish water lagoon are thought by NMFS to enhance the quality of rearing habitat for juvenile salmonids. The Russian River Biological Opinion prescribes a program of potential, incremental steps to accomplish these conditions, including adaptive management of a lagoon outlet channel on the barrier beach during the lagoon management

[3] The Russian River Biological Opinion may be accessed online at www.sonomacountywater.org and may be reviewed at the Water Agency's office located at 404 Aviation Boulevard, Santa Rosa, CA.

[4] National Marine Fisheries Service. *Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed*. p. 243. September 2008.

period. The Water Agency would continue the historical practice of artificially breaching the barrier beach to minimize flooding outside of the lagoon management period.

1.2 Draft EIR Public Review Process

On December 15, 2010, the Water Agency, as the CEQA Lead Agency, released for public review the Draft EIR for the Russian River Estuary Management Project. Appendix A provides the distribution list of individuals, organizations, and agencies that received the Draft EIR and Notice of Availability. A 60-day public review and comment period on the Draft EIR ended February 14, 2011.A public hearing on the Draft EIR was held during the public review period on January 18, 2010 from 6:00 p.m. to 9:00 p.m. at the Jenner Community Center, located at 10398 Highway 1, in Jenner, California.

1.3 Purpose of the Final EIR

This Response to Comments document is the finalizing addendum to the Draft Environmental Impact Report (Draft EIR) prepared by the Water Agency for consideration of the Russian River Estuary Management Project. CEQA requires a lead agency that has completed a Draft EIR to consult with and obtain comments from public agencies that have legal jurisdiction with respect to the proposed action, and to provide the general public with opportunities to comment on the Draft EIR.

The Draft EIR detailed the proposed Estuary Management Project, evaluated and described the potential environmental impacts associated with the creation, implementation, and maintenance of the lagoon outlet channel during the lagoon management period, identified those impacts that could be significant, and presented mitigation measures, which, if adopted by the Water Agency, could avoid or minimize these impacts. The Draft EIR also evaluated alternatives to the proposed project, including the No Project Alternative, as required by the California Environmental Quality Act (CEQA), a Habitat Restoration Alternative, Temporary Outlet Standpipe, Reduced Project Alternative, Jetty Modification Alternative, and Alternative Flood Control Measures.

This Response to Comments document, together with the December 2010 Draft EIR, constitutes the Final EIR for the proposed project. This Final EIR has been prepared to respond to comments received from agencies and members of the public on the Draft EIR for the Estuary Management Project. The Final EIR will be used by the Water Agency as part of its application approval process, which includes selecting project alternatives, adopting mitigation measures, and reviewing project costs.

1.4 Organization of the Final EIR

As required by CEQA Guidelines Section 15132, the Final EIR consists of the following elements:

a. The Draft EIR or a revision of that draft.

b. Comments and recommendations received on the Draft EIR either verbatim or in a summary.

c. A list of persons, organizations, and public agencies commenting on the Draft EIR.

d. The response of the Lead Agency to significant environmental points raised in review and consultation process.

e. Any other information added by the Lead Agency.

Chapter 1, Introduction, describes the purpose and content of the Final EIR. Table 1, at the end of the Chapter, includes a list of commenters and affiliation, and summaries of each comment.

Chapter 2, Master Responses, presents comprehensive discussions to environmental issues raised in multiple comments. These have been termed "master responses." They are organized by topic to provide a more comprehensive response than may be possible in responding to individual comments, and so that reviewers can readily locate all relevant information pertaining to an issue of concern. Each master response includes cross-references to the individual comments being addressed, using the alphanumeric codes shown in Table 1.

Chapter 3, Response to Comments, contains copies of all comment letters received on the Draft EIR as well as a copy of the transcript for the public meeting held on January 18, 2011, and individual responses to the comments. Responses are keyed to the individual comments as indicated in the right margin of the comment letters.

Chapter 4, Revisions to the Draft EIR, presents revisions to the Draft EIR text based on issues raised by comments, clarifications, or corrections. Additions, deletions and corrections to the Draft EIR, are made by indicating the page, and paragraph to be revised and a description of the text changes. Additions are indicated by an underline, deletions are indicated by a "strike-out" where practical.

Appendix 1, Distribution List, includes the agencies, organizations, and persons that received the hard copy Draft EIR, CD copy Draft EIR or Notice of Availability (NOA) of Notice of Preparation (NOP). This includes the entities who received the NOA and/or postcard informing the public release of the Draft EIR.

Appendix 2, Guerneville Flow Data Relative to Closure Events During the Lagoon Management Period (1996 - 2009).

1.5 Requirements for Certification and Future Steps in Project Approval

In accordance with CEQA, the Draft EIR was circulated for public and agency review and comment and a 60-day public review period was provided, closing on February 14, 2011. Comments were received from Federal, State, and local agencies; organizations and individuals.

A public hearing to receive public input on the Draft EIR was held during the review period. The public hearings were recorded and transcripts were made.

Pursuant to Section 15088 of the CEQA Guidelines, the Final EIR is being made available to the commenters for a minimum 10-day period prior to its consideration by the CEQA Lead Agency for certification. The Water Agency's Board of Supervisors will consider the EIR for certification as complete under Section 15090 of the CEQA Guidelines. The Board will consider project approval; prepare and adopt written findings of fact for each significant environmental impact identified in the EIR; make a Statement of Overriding Considerations, if needed; and adopt a Mitigation Monitoring and Reporting Program. A Notice of Determination (NOD) will then be filed.

1.6 Comments Received on Draft EIR

Table 1 below lists the agencies, organizations, and individuals that submitted written and oral comments on the Draft EIR during the public review period. Table 1 also lists the designator keyed to the responses, brief summaries of each individual comment, and relevant Master Responses.

Written comments on the Draft EIR were received by mail, email, fax, or other delivery during the 60-day public comment period from December 15, 2010 through February 14, 2011, by 5:00 p.m., the publicly-noticed end of the public comment period on the Draft EIR.

1.7 References

Heckel, M., Russian River Estuary Study, 1992-1993, Prepared for Sonoma County Department of Planning and California State Coastal Conservancy, 1994.

Sonoma County Water Agency (SCWA), *Request for Marine Mammal Protection Act Incidental Harassment Authorization, Russian River Estuary Management Activities*, September 2009.

TABLE 1
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Agencies – FEDERAL				
F_NMFS	National Marine Fisheries Service, National Oceanic and Atmospheric Administration, Dick Butler	1	Language in DEIR asserting NMFS "mandated" the project is misleading and does not characterize the collaboration between NMFS, USACE, and the Water Agency.	
		2	DEIR does not consider potential creation of a stable lagoon system by filling the outlet channel with sand. Recommend making this minor modification.	
		3	DEIR mischaracterizes potential water quality impact by not analyzing the cross-sectional distribution of water quality gradients. Analysis does not characterize how vertical water quality profile affects and benefits estuarine habitat. DEIR should acknowledge the spatial extent, amount, and quality of shallow water habitat that would result from the project. Analysis should not be restricted to Estuary Study Reach and should extend upstream to Monte Rio.	2.4
		4	DEIR does not adequately describe difference in potential available rearing habitat under the Reduced Project Alternative versus the proposed project.	
		5	Elements of the Biological Opinion undertaken outside the lagoon management period can contribute to achieving project objectives.	
		6	Clarify that expected benefits of project are not just a conclusion by NMFS, but also by numerous peer-reviewed literature, to avoid skepticism and misinformation.	
		7	Habitat Restoration Alternative is vague.	2.5
		8	DEIR misstates length of Dry Creek.	
		9	DEIR misrepresents adaptive management strategy of the Biological Opinion as a project alternative. Jetty removal as a project alternative has no potential to achieve project objectives without implementing the full proposed project's adaptive management strategy.	2.5
Public Agencies – STATE				
S_CDFG	California Department of Fish and Game Bay Delta Region, Scott Wilson	1	Concurs with DEIR finding that project implementation would result in conditions that resemble observed conditions and that changes in vegetative assemblages would likely result in increase in sensitive Coast and Freshwater Marsh habitat which could benefit species utilizing the Estuary as habitat.	
		2	Concurs with DEIR finding that project will benefit fish habitat availability; however DEIR should include more thorough analysis of difference in potential available rearing habitat under the Reduced Project Alternative versus proposed project.	
		3	The adaptive management element of the project, including rigorous monitoring of water quality conditions, is an appropriate approach to mitigate any adverse effects to habitat quality.	
		4	DEIR should address compatibility of the project with the overall regulations, goals, and guidelines of the Marine Life Protection Act and the corresponding Marine Protected Areas in the project area.	
		5	Immediate implementation of an adaptive management plan is essential in meeting water level management targets in the Biological Opinion. Adaptive management plan should include Biological Opinion criteria.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Agencies – STATE (cont.)				
		6	Recommends Water Agency continue study of the effects of jetty modification and alternative flood control measures as future potential actions to be included in the adaptive management aspect of the project, rather than be considered as project alternatives.	
		7	Lake and Streambed Alteration Agreement may be required pursuant to Fish and Game Code and is subject to CEQA. CEQA document must fully identify the potential impacts to the stream or riparian resources and provide adequate mitigation or avoidance measures.	
S_CDPR	State of California Department of Parks and Recreation, Liz Burko	1	DEIR does not analyze impact of beach closure during mechanical breaching as it relates to coastal access.	*2.1*
		2	Asserts that limitation of coastal access during the lagoon management period is significant.	
		3	DEIR does not provide mitigation to reduce significant coastal access impact. There are opportunities for the Water Agency to enhance other coastal access points.	
		4	DEIR does not include baseline quantification of the frequency and quality of waves surfed at the mouth of the Russian River. Estimates should be made by reviewing weather records, breaching records, hydrograph records, seal data notes, and consultation with local surfers.	*2.6*
		5	DEIR should identify mitigation in the form of new wave breaks as part of a tiered mitigation strategy, for the significant impacts to surfing. Opportunities include improving or maintaining coastal access (to address low level of impact), providing new access to surf spots that are currently inaccessible (moderate level of impact), or creation of an artificial reef (if total loss of surfing area).	*2.6*
		6	Goal should be more inclusive than coho and steelhead.	
S_CSLC	California State Lands Commission, Cy Oggins	1	Corrects information regarding the Water Agency's lease.	
		2	Mitigation for short-term impacts to special-status plants and animal species does not "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way" (CEQA Guidelines Section 15126.4(b)). Measure defers formulation of mitigation.	
		3	Mitigation requiring worker environmental training should also require presence of onsite biological monitor.	
		4	Significance determinations for impacts to Waters and Wetlands, and Wildlife movement and Nursery Sites, are inconsistent in the section versus the Executive Summary. Should be listed as less than significant with mitigation.	
		5	Although expected levels and duration of inundation may results in a net increase of Coastal and Valley Freshwater Marsh, the adaptive management plan should still address recognized uncertainty. EIR should include a more rigorous discussion of factors that suggests this upland shift will occur, rather than a net reduction of Coast and Valley Freshwater Marsh. If this discussion still concludes effects remain uncertain, a multi-year vegetation monitoring component could identify and mitigate an unanticipated net decline in Coast and Valley Freshwater Marsh.	
		6	Correct numerical typographic errors.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Agencies – STATE (cont.)				
		7	EIR should revisit potential mitigation for significant impacts to recreation. Although it may not be physically possible to avoid effects to surfing and beach access, the Water Agency can still identify feasible offsets or compensation to the affected public.	*2.6*
		8	Correct typographical error in Cultural Resources section.	
		9	Cultural Resources background research and records search results does not include the CSLC Shipwreck Database, which lists the schooner Sovereign as having grounded in 1873 at the Russian River. It is possible future work could uncover a shipwreck due to high level of disturbance on beach using heavy equipment.	
		10	Note that Penny Island is also referred to as Crab Island (historical). Discuss the history of the island relative to potential historic or archaeological resources.	
		11	CSLC should be listed as an agency to be contacted in the event of inadvertent discovery of archaeological resources. A qualified maritime archaeologist must examine a shipwreck to determine significance of the find.	
		12	Correct terminology of level of significance for cumulative impacts in the Executive Summary table.	
S_NCRWQCB	North Coast Regional Water Quality Control Board, John Short	1	2010 303(d) List includes three impairments for the Russian River within the project area: sedimentation/siltation, temperature, and indicator bacteria. NCRWQCB staff are developing a pathogen total maximum daily load to address indicator bacteria, and a temperature implementation policy to address temperature impairment. Sedimentation is addresses in part by Resolution No. R1-2004-0087.	
		2	Concurs with DEIR finding that project could adversely affect water quality due to increased biostimulatory substances (nitrogen and phosphorus), and increased bacteria. Exceedances of Department of Health Services freshwater beach indicator bacteria thresholds have occurred and may continue during the lagoon management period.	
		3	Elevated water levels have potential to inundate residential septic systems and cause failures that could result in discharge violations of the Basin Plan.	
		4	DEIR does not describe possible impacts of longer hypoxic and anoxic conditions in the Estuary to the beneficial uses of the deepest portions of the Estuary, such as bottom-dwelling fish and invertebrates. Recommends further monitoring to determine extent of impact.	*2.4*
		5	Fish Habitat Flows and Water Rights Project (Fish Flow Project) has potential to cause changes in water levels, and should be considered further with Estuary Management Project impacts.	*2.1*
		6	Additional information should be provided to demonstrate the lack of potential water quality impacts between Austin Creek and Vacation Beach or additional analysis of potential impacts in the upstream reach of backwater.	*2.2*
		7	State Water Resources Control Board has established sediment criteria for enclosed bays and estuaries. DEIR does not include a discussion on compliance with these standards.	
		8	Project required Clean Water Act Section 401 Water Quality Certification for breaching. Current certification has had its expiration date amended twice and expired on December 31, 2010. The Water Agency has submitted an application for the new methods of Estuary management and breaching; processing is pending completion of DEIR certification.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Agencies – STATE (cont.)				
		9	Supports objective to enhance quality of rearing habitat for juvenile salmonids.	
		10	Although inclusion of mitigation measures for water quality impacts may be infeasible, a robust water quality and sediment quality monitoring program should be developed and collected data should be made available to the public. Contingency plans should be developed to include signage and public outreach is monitoring identifies exceedances of recognized water quality standards intended to protect public health. Concur that the project's Adaptive Management Plan provisions for breaching in the event of such conditions in warranted.	
Public Agencies - LOCAL				
L_MRRPD	Monte Rio Recreation & Park District, Stephen Baxman	1	Concerned that EIR does not consider health and safety risks, including bank erosion, water depth increase, loss of beach front areas, and hazardous swimming conditions.	*2.4; 2.6*
		2	Does not consider empirical findings of 2009 Russian River Photo Report that discusses negative implications of *Ludwigia* on beach ecosystems that disrupts recreation activities.	*2.4*
		3	Loss of beach in Monte Rio would result in financial impacts. Project would impact ability to use boardwalks and place concession stands and boat rental stands in safe, convenient place.	*2.6*
		4	Invites Water Agency to tour beaches and meet directors.	
L_NSCAPCD	Northern Sonoma County Air Pollution Control District, Jessica DePrimo	1	Primary concerns are on-road and off-road vehicle emissions, airborne dust generated during construction, and potential disturbance of rock containing naturally occurring asbestos; however given the nature of the project, airborne dust and asbestos are not issues for the project.	
		2	Concur that on-site equipment and transport vehicles would not result in a significant impact to air quality. Recommend that the Water Agency conduct vehicle activities in accordance with State laws specific to off-road heavy-duty diesel vehicle regulation. This requires owners of off-road equipment to label the equipment and report to the California Air Resources Board and limit idling time. Recommends portable equipment (generators or compressors) be permitted with the NSCARP or registered under the California Air Resources Board Statewide Portable Equipment Registration Program.	
L_RRRPD	Russian River Recreation and Park District, Dana Zimmerman	1	Add name and address to notification list.	
		2	Concerned about separation of Estuary Management Project DEIR from the Fish Flow Project. CEQA requires entire process to be considered in one environmental document.	*2.1; 2.7*
		3	Prefer Reduced Project Alternative. No buildings would be flooded at this level, making low flow unnecessary.	*2.1; 2.5*
		4	Concerned with water quality and recreational impacts from low flow.	
		5	Concerned about water quality from decreased water flow, including possible added pollution from nutrients, toxins, bacteria, temperature, and invasive species.	*2.1; 2.4*
		6	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Flow EIR.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Agencies - LOCAL (cont.)				
		7	In 2009 several locations tested positive for *Enterococcus*. Only other recorded incident was July 2002 for E. coli, corresponding to a documented sewage spill from Santa Rosa.	*2.4*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	
Organizations/ Groups				
G_ACA	Austin Creek Alliance, Pamela Conley	1	DEIR does not consider lower flows and the impact on the environment upstream to Forestville. CEQA requires analysis of the whole of the action.	*2.2*
		2	Purpose of lower flows is to prevent flooding of Jenner properties, but lower flows affect river upstream to Vacation Beach. DEIR only studies upstream to Duncans Mills.	*2.1; 2.2*
		3	Lower flows will exacerbate water qualities such as agricultural pesticide runoff from wineries, septic tank leakage, and algal blooms. DEIR does not consider this and ignores CEQA.	*2.1*
		4	Salmonids and steelhead would be subject to poor water quality caused by low flows. How can these seven species not be considered as part of the whole project upstream?	*2.1; 2.2*
		5	Concerned that seals will be disturbed by heavy machinery.	
		6	Concerned that NMFS' rationale for the project is supported by examples of other projects that have different urban/agricultural impacts than those that affect the Russian River. These differences are not individually compared.	*2.3*
		7	Concerned about general public mistrust of project. Asserts Water Agency and NMFS should alleviate these doubts and consider economic impacts. Concerned project is a water grab, and if so, lawsuits may be filed.	*2.1*
		8	Concerned that Water Agency and NMFS have not consulted with local environmental leaders.	*2.8*
		9	Concerned project will not work. Concerned that river, tourism, economy, and wildlife will be lost for nothing if project fails.	*2.3*
		10	DEIR should follow law of CEQA and consider the project not as an Estuary closing, but as the Russian River as a whole.	*2.1*
G_CAG	Coast Action Group, Alan Levine	1	Separation of Estuary Management Project and Fish Flow Project is inconsistent with CEQA	*2.1*
		2	Lower river impacts from Dry Creek downstream should be analyzed in DEIR. DEIR fails to consider effects of the Estuary Management Project on Fish Flow Project.	*2.1; 2.5*
		3	Proposed flow changes at Hacienda has no other purpose that prevention of flooding of two Jenner buildings. Preferred alternative is to maintain Estuary levels at 8 feet. No buildings would flood at this level, making low flows unnecessary.	*2.1*
		4	Separation of Estuary Management Project and Fish Flow Project is inconsistent with CEQA	*2.1; 2.2*
		5	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.6*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		6	Project is only viable during drought years when water quality impacts would be the greatest. This issue should be addressed.	*2.1; 2.2*
		7	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.1; 2.4*
		8	All available and relevant water quality information must be made available to public and reviewing agencies.	*2.1; 2.5*
		9	DEIR should include definitive work addressing nutrient and bacteria problems, and low flow effect on bioaccumulation of pollutants, and effect on colonization of invasive plants and hydrophytes.	*2.4*
		10	Concern with water quality and bacteria in the Estuary.	*2.1; 2.4*
		11	DEIR does not address the problems. Cannot save a species with a limited and segmented approach.	*2.1*
G_DOW	Defenders of Wildlife, Richard Charter	1	Concerned about past failures of attempts to re-engineers Russian River mouth and unsuccessfully managed flow regimes.	*2.3*
		2	Concerned about DEIR regarding water quality, flows, project description, shortcomings of administration and decision making procedures.	*2.2; 2.4*
		3	Project description is unclear about long-term viability of project, but admits project should be considered an experiment, at best.	*2.3*
		4	DEIR fails to address potential harm to upstream habitat, wildlife, fish, beyond steelhead.	
		5	Geographic scope is inadequate, extending only to Duncans Mills.	*2.2*
		6	Temporary Urgency Change Petitions and Orders have no CEQA review, and there is no CEQA review for lower reach between Forestville and Duncans Mills in spite of recommendation from NMFS that is be included.	
		7	DEIR reference unrelated Estuary studies for other rivers with different circumstances.	*2.3*
		8	DEIR does not adequately address the new marine protected area under the Marine Life Protection Act.	
		9	DEIR does not clarify how minimum flows will be maintained in wet years.	*2.1*
		10	DEIR does not adequately address recreational and economic impacts.	*2.6*
		11	DEIR does not adequately review special-status species.	
		12	DEIR does not adequately delineate or assess anticipated impacts of altered water levels on Penny Island.	
		13	Inadequate monitoring of bacteria and nutrients in Estuary and lower river. Undefined conditions are flawed rationalization to avoid mitigation.	*2.4; 2.7*
		14	DEIR does not evaluate implications of biomagnification and cumulative effects for toxic compounds.	
		15	DEIR concludes there are problems with excess nutrient levels but does not provide adequate evaluation of mitigation.	*2.4; 2.6*
		16	DEIR does not adequately consider pathogens impairments linked to rainfall events.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		17	DEIR does not properly consider and evaluate long-term impacts on species other than steelhead; does not evaluate biological diversity, including wildlife such as birds and mammals and the other 47 fish species in the Russian River.	
		18	DEIR does not adequately consider impacts on pinnipeds, or address the potential loss of the harbor seal haulouts.	
		19	NOI or DEIR do not adequately address the probable effects of the project pursuant to CEQA Guidelines Section 15082(c).	
		20	Requests confirmation of receipt of comments via email.	
G_FOER	Friends of the Eel River, David Keller	1	Changes in Estuary management and Russian River flows via Dry Creek through Lake Sonoma, Lake Mendocino are related to changes in flow regime and management options for the Estuary Management Project.	*2.1*
		2	Project cannot be considered separately from the rest of the requirements and recommendations of the Russian River Biological Opinion. Estuary Management Project and the Fish Flow Project should be reviewed as one project.	*2.1; 2.9*
		3	Requests including by reference prior comments submitted for the Fish Flow Project NOP.	*2.1*
		4	Inflows from the Eel River are instrumental in maintaining flows in the Russian River. DEIR needs to disclose the Estuary Project's relationship to the Eel River and must be corrected to account for the water and impact of inflows on the Eel and Russian Rivers.	*2.1; 2.3*
		5	For modeling, DEIR must provide an alternative of flows, water quality, and flood level management alternative that does not include inflows from the Eel River. Commenter attached alternative approach in comments submitted for Fish Flow Project NOP.	*2.1*
		6	Management of flood levels at the Estuary must include an alternative of removal of the affected low-lying structures, rather than maintaining flood levels to protect the structures.	
		7	Commenter refers to the "Galloway Report" and states that the structures being offered protection as part of the Estuary Management Project are not water dependent or critical infrastructure. Therefore, an alternative must be developed that removes or elevates the structures above flood elevations	
		8	Commenter attached email correspondence with the Water Agency and NMFS which discusses the before mentioned issues and problems.	
G_FOVG	Friends of Villa Grande, Richard Holmer	1	DEIR does not mention or analyze the impacts to beach recreation, swimming, fishing, etc. from the Patterson Point Preserve.	*2.4*
		2	Issues are broader than those addressed in the DEIR. DEIR does not consider upstream to Villa Grande. Should analyze River as a whole.	*2.2*
		3	DEIR does not address flow rate which is being analyzed separately. Should be addressed as a whole in one EIR.	*2.1*
		4	DEIR is inadequate because it does not include potential impacts to the Patterson Point Preserve. Effects should be addressed and quantified before DEIR is certified. Specific mitigation measures to address recreational use at the Preserve should be included.	*2.6*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
G_LOZDRU	Lozeau Drury LLP - Russian River Watershed Protection	1	DEIR does not address the whole of the action, which should include the Fish Flow Project.	*2.1*
		2	DEIR analysis of existing water quality conditions and characterization of those conditions as ”natural” is not supported by substantial evidence.	*2.4; 2.7*
		3	DEIR analysis of water quality impacts is inadequate.	*2.4*
		4	DEIR does not identify and propose adoption of all feasible mitigation measures to address water quality impacts.	*2.4; 2.6*
		5	DEIR should expand scope to include Fish Flow Project and to revise and recirculate the water quality analysis.	*2.1; 2.4; 2.9*
		6	DEIR underestimates the water quality impacts because Estuary Management Project is separated from the Fish Flow Project.	*2.1*
		7	Public agencies may not divide a project into smaller individual projects to avoid responsibility for considering the environmental impact of the project as a whole. Assertions supported by caselaw citations. Separate governmental approvals do not create separate projects. Based on cited CEQA caselaw, Estuary Management Project and Fish Flow Project constitute a single action under CEQA because both actions have a common objective to provide habitat for salmonids, because the timing of the project overlaps and the Water Agency is implementing both projects.	*2.1*
		8	DEIR water quality analysis downplays the existing degraded water quality conditions in the affected area, does not fully analyze the potential project impacts of obstructing the river mouth, and does not identify mitigation.	*2.1;2.4*
		9	DEIR analysis of existing water quality conditions and characterization of those conditions as natural is not supported by substantial evidence. DEIR misleads reader to believe that pollutants in excess of the Basin Plan water quality objectives are not important because they are “natural conditions” and they are not included on the 303(d) list for impairments. Just because a waterbody is not listed on 303(d) list does not mean it is not impaired. DEIR data shows the waterbody exceeds Basin Plan water quality objectives for dissolved oxygen and fecal coliform. RWQCB has identified concerns about water quality impacts of the Estuary Management Project, especially as combined with the Fish Flow Project, per letter November 15, 2010. DEIR should more clearly describe the measured exceedances of objectives and refrain from suggesting that the exceedances are inconsequential and consistent with beneficial uses. DEIR downplays the violations of dissolved oxygen by claiming it is naturally occurring, which is not supported by any reasonable analysis or substantial evidence.	*2.4*
		10	DEIR does not analyze water quality in the Estuary prior to creation of the proposed channel. DEIR does not describe the length of time for water levels to reach 7 to 9 foot range after mouth closes, during which there will be a period of “no-flow through”. It appears that higher water levels allowed before breaching coupled with lower flows will extend the period of “no-flow-through”, steady state” system. DEIR omits discussion of water quality conditions during this time period.	
		11	DEIR does not include analysis of other pollutants, including mercury and copper, which could be exacerbated by the project.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		12	DEIR does not identify all feasible mitigation measures available to address the expected water quality impacts. DEIR concludes that potential increase in bacteria, nutrient, and salinity levels are significant and unavoidable but does not identify mitigation; not even monitoring. An agency may approve a project with significant and unavoidable impacts only if it has lessened or eliminated impacts where feasible and accepted a statement of overriding considerations. Assertions supported by case law citations. A lead agency may not make a finding of significant and unavoidable without requiring implementation of all feasible measures.	*2.4; 2.6*
		13	DEIR does not disclose the details comprising the Adaptive Management Plan. DEIR also refers to monitoring and updating of the plan, but does not inform decision makers what the plan is, what triggers plan implementation, and what monitoring would take place. Without including the terms of the Adaptive Management Plan, detailed monitoring requirements, and other feasible mitigation measures, the Water Agency cannot make a significant and unavoidable finding for water quality impacts.	*2.3; 2.7*
		14	DEIR should be revised and recirculated.	*2.9*
G_NCRW	North Coast River Watch, Larry Hanson	1	DEIR is deficient because it segments the Estuary Management Project from the flow regime changes in Dry Creek. Proposed lower flows may cause significant adverse effects to the lower section of the River.	*2.1*
		2	DEIR does not sufficiently analyze water quality in the lower Russian River, per the RWQCB letter (November 15, 2010). DEIR does not include quantitative assessment of potential violations of water quality standards or mitigation to reduce water quality impacts.	*2.4*
		3	DEIR alternatives analysis is deficient because it does not include a cost analysis to differentiate between alternatives.	*2.5*
		4	DEIR alternatives analysis is deficient and decision for project chosen is not substantiated. DEIR does not consider possible alternative of combining multiple methods, for example the Alternative Flood Control Management and Habitat Restoration Alternatives, to meet project objectives.	*2.5*
		5	Design of outlet channel is variable; final determination is an adaptive process not specific criteria. How can this uncertainty result in a positive conclusion for meeting project objectives when the conclusion for jetty removal is unknown? The ability of the proposed project to meet objectives should be characterized as “unknown”.	*2.5*
		6	DEIR should address other factors as unknown, such as how stratification layer could occur and the potential benefit to salmonid species, how predation rates could change, pinniped impacts, human activities to control opening closure, and managing the Estuary as a lagoon is different than letting these things occur naturally.	
		7	DEIR analysis of direct construction related impacts is not sufficient. This factor should be eliminated due to disruption to wildlife and take of species. Other alternatives should be evaluated based on least construction to achieve objectives.	
		8	Reserves right to incorporate comments from November 2010 when requested data from Water Agency.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
G_RRWPC	Russian River Watershed Protection Committee, Brenda Adelman	1	Comment requests that revised scoping comments be responded to as part of the Final EIR.	
		2	Comment asserts the DEIR contains repetition, contradiction, and inconsistency. Asserts numeric data was presented incorrectly and does not match commenter assessment.	
		3	Comment requires a definition of what is considered “natural” conditions. Asserts that if “natural” conditions are desired then DEIR must consider if certain plants or animals have been acclimated or extirpated during the period from dam installation until present.	*2.1*
		4	Comment asserts that characterization of temperature, bacteria, and nutrients as natural is not accurate Concerned that there is no evidence to support the assertion that flows have been as low as 25 cfs.	*2.1; 2.4*
		5	Comment provides a description of pre-dam conditions and requests that DEIR include a description of the environment and recreation based on consultation with local historians.	*2.1*
		6	Comment questions the impacts on fish habitat over the last 100 years, and questions how loss of flow will add to this impact.	*2.1*
		7	Comment asserts that Biological Opinion recommends low flows with no evidence of whether this is “natural”.	*2.1*
		8	Comment questions how low flow will impact already degraded [water quality] conditions during the lagoon management period.	*2.1*
		9	Comment questions what will happen to down-migrating Chinook if the river closes in May.	
		10	Comment requests information on impacts of low flow on conventional and toxic pollutants; requests average flow data at Hacienda for months during the lagoon.	*2.1*
		11	Comment asserts water quality impacts resulting from low flow must be addressed.	*2.1; 2.4*
		12	Refers to historical photos.	
		13	Refers to dam operations and flow changes.	*2.1*
		14	Comment asserts that project implementation is a wasted effort if the mouth does not close until September.	*2.1*
		15	Comment refers to low flows and project objectives.	*2.1*
		16	Comment refers to low flows and flow data.	*2.1*
		17	Comment asserts Fish Flow Project and Estuary Management Project should be linked because low flow is only necessary to avoid flooding.	*2.1*
		18	Comment asserts DEIR avoids impacts upstream of Duncans Mills.	*2.1; 2.4*
		19	Comment asserts that term “likely” in the context of discussing potential future barrier beach closures after reduction of summer flows is a supposition.	
		20	Comment asserts that the common connection between the Estuary Management Project and the Fish Flow Project is flood management.	*2.1*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		21	Comment questions if low flow is inherently necessary to the Estuary Management Project, and that project does not seem feasible given the wide range of uncontrollable historic flow scenarios.	*2.1*
		22	Comment requests clarification of whether 71 cfs was measured during a closure event.	
		23	Refers to 2009 Photo Report.	
		24	Comment asserts that Temporary Urgency Change Petitions are not analyzed under CEQA, so low flows are occurring anyway, even before Estuary Management Project and permits are approved. Comment reiterates language from the NMFS to the SWRCB regarding frequency of temporary urgency change petitions.	
		25	Asserts that the NMFS scoping letter, dated June 22, 2010 states that the public CEQA meetings were unclear as to what extent the Estuary Management Project will address the effects of summer stream flow change that will support the goal of a closed Estuary.	
		26	Comment states that new breaching permits are required for several agencies; questions why project was implemented in 2010, whether the Water Agency intends to implement it this year, and if litigation occurs, would the project proceed.	
		27	Comment questions why there is no environmental review under the National Environmental Policy Act (NEPA).	
		28	DEIR does not provide data to prove low flows are not necessary for the project.	*2.1*
		29	DEIR should be more scientifically evaluate adverse water quality impacts in the lower river.	*2.1*
		30	Averaging low flow data is misleading. DEIR should discuss weather scenarios and flows. 2009 and 2010 to provide comparison to understand closures.	
		31	Comment is about the Biological Opinion's determination of flow. DEIR should analyze the project under drought conditions. Median flow data is misleading.	*2.1*
		32	DEIR should not conclude that water quality impacts are less than significant because the Russian River is not listed on the 303(d) list. DEIR should address biostimulatory substances and algal blooms.	*2.1; 2.4*
		33	Comment cites the Regional Board Scoping Comment on the Fish Flow Project.	*2.1*
		34	Questions how nutrients listed on 2012 303(d) will impact the Estuary. Questions what kind of mitigation would be implemented if nutrients are more of a problem during closed conditions than open. Concerned with impacts to steelhead if there are high pollution levels.	*2.1*
		35	Concerned with *Ludwigia* in the lower reach, tributaries and during low flow.	*2.4*
		36	Concerned with elevated nutrient levels during open and closed conditions of the Estuary. Questions the water levels at which elevated nitrogen occurs.	
		37	DEIR should address phosphorus and algal blooms. Questions impacts excessive phosphorus would have on the upper and lower Estuary.	
		38	DEIR should consider Russian River County Sanitation District discharge of nutrients and secondary water quality impacts. Question if there is a direct connection between the Russian River County Sanitation District discharge and the growth of *Ludwigia* at certain locations.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		39	Questions impacts on steelhead and other species if there were higher nutrient levels.	*2.1*
		40	Questions why no nutrient data was presented for 2009. Questions analysis on algal blooms and chlorophyll levels. Request clarification on chlorophyll levels.	*2.4*
		41	DEIR alludes to water quality conditions as natural without evidence. Request "natural circumstances" be eliminated. Request that every unavoidable and significant impact, mitigations be spelled out.	*2.4; 2.6; 2.7*
		42	Coliform results from data collected in 2009 and 2010 show different scenarios. Question conditions of high coliform levels with increase flow. Concerned with bacteria levels and how it could harm recreation and fish. Comment asks how high bacteria levels will exacerbate this problem. Questions why there is little data on nutrients and bacteria.	*2.3; 2.4*
		43	Questions why future monitoring is being allowed as a proposed mitigation measure and what kind of monitoring will be done. Questions why the DEIR does not address toxins or included fish sampling. Comment concerned there are no criteria for evaluating success or failure of project.	*2.4; 2.6*
		44	Comment asserts that the DEIR does not address heavy metals, such as mercury and copper.	*2.4*
		45	Concerned with pollution in the Estuary and its effects on fish.	*2.4*
		46	Asserts that the river is listed as impaired for temperature. Concerned with low flow effects on high water temperature and if waters upstream are contributing to the problem. Asserts 2009 data show that there were warmer water temperatures at the mouth of the river during a mouth closing event. Concerned with the productivity of the Estuary fish species.	*2.4*
		47	Comment asserts that the DEIR excluded Chinook and does not consider impacts for increased predator levels and higher water temperature. Concerned with the impacts to the Chinook.	
		48	Concerned about impacts to Dungeness crab and why the DEIR did not quantify impacts. Concerned with their availability, habitats and permits.	
		49	Concerned to Dungeness crab harvesting opportunities.	
		50	Comment asserts that local organizations were not consulted in the process of analyzing recreational impacts; the analysis does not include upstream areas, and the analysis of impacts at Goat Rock State Beach are not sufficient.	*2.6*
		51	Comment request clarification on purposed project dates. Questions why the Water Agency is being asked to maintain approximately 85 cfs at the Hacienda gage, even if it is not required. Would like clarification on the meanings of the low flow values.	*2.1*
		52	Asserts the TUC fails to acknowledge that there are other resources damaging impacts being exacerbated by the project.	*2.1*
		53	Questions how the listing of 2012 303(d) will impact the project. Request additional information regarding reading levels and believe the DEIR down plays an increase in coliform levels.	*2.4*
		54	DEIR lacks scientific evidence.	*2.3*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		55	Comment concerned there are no criteria for evaluating success or failure of project.	*2.3*
		56	Geographic scope should include Monte Rio Beach. Concerned lagoon will become a sink for pollutants that bioaccumulate in biota and sediments and may create hazards to humans and fish. Concerned that anoxic ("Dead") zone harbors pollutants.	*2.2, 2.4*
		57	Concerned with bifurcation of Estuary Management Project and D1610. Quotes CEQA Section 15003(h) that an EIR must consider the whole of an action, not its constituent parts.	*2.1*
		58	References Bill Hearn's article in the *Sonoma County Gazette*. References Item #12 in RRWPC comments to Water Agency and SWRQCB on Petition to permanently change flows. Quotes Prunuske Chatam, et. al. assertion that Biological Opinion objectives do not include natural flows or an increase in salmon and steelhead populations.	*2.1*
		59	DEIR does not provide a quantitative goal for habitat improvement. Are populations still declining, improving, or staying the same under D1610? Is the goal of "improving habitat sufficient to stabilize populations presently below historic numbers? Critical of why Estuary Management Project and D1610 changes are necessary. Relationship between flows, mouth closings, habitat resources, fish abundance and health, need to be defined in EIR.	*2.1*
		60	DEIR should address these questions and verify claims in Hearn's article.	*2.1*
		61	DEIR should consider D1610 flows and flooding of properties.	*2.1*
		62	DEIR should address role of climate change in long term management.	*2.3*
G_SCWC	Sonoma County Water Coalition, Stephen Fuller-Rowell	1	Commenter states that the Estuary Management Project and Fish Flow Project should be reviewed in one document. The purpose of both projects is to fulfill requirements of the Biological Opinion. The commenter objects the bifurcation of the Estuary Management Project from the Fish Flow Project.	*2.1; 2.2*
		2	Commenter states that changes of minimum flows as part of the Fish Flow Project only has the purpose to prevent flooding from Estuary closure.	*2.1; 2.5*
		3	Commenter states that the purpose of both projects is to fulfill requirements of the Biological Opinion, which assumes that the river flows must be managed to form an Estuary lagoon.	*2.1*
		4	Commenter states that the DEIR should analyze the Fish Flows Project, in particular water quality studies and environmental analysis for the entire lower river the Dry Creek down.	*2.1*
		5	DEIR should analyze impacts upstream to Vacation Beach.	*2.2*
		6	Commenter states that the Water Agency can not control flows at Hacienda during wet years, therefore this project is only viable in drought years and that this should be analyzed in light of Biological Opinion requirements.	*2.1; 2.4*
		7	Commenter states that when flows are lowered in dry years, the river mouth usually stays open (as evidenced in August 2009 when flows averaged 63cfs).	
		8	Commenter states that the preferred project maintains Estuary levels at 8 feet. No flooding of buildings would occur at this level, therefore low flow is unnecessary.	2.1; 2.5
		9	Commenter states that it is unacceptable that water quality studies will not be available until the EIR is released.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		10	DEIR should examine the relationship between nutrient and bacteria problems during periods of the closed lagoon and low flow conditions.	*2.4*
		11	Risks with toxic blue green algae in the lower river during the closed Estuary should be addressed.	*2.4*
		12	Russian River Estuary is only a small part of the big picture and should be part of a broader program of tributary restoration.	2.1; 2.4
G_Seal	Sealwatch Program, Dian Hardy	1	Concerned about the loss of “sandy haulouts” on harbor seals.	
		2	DEIR should address actions taken to ensure that seals will not be driven out. Concern about impacts on the seals from ongoing disruption and harassment from equipment and more people. Commenter states that monitoring will not mitigate this.	
		3	Commenter states that the Warm Springs Dam had a huge impact on the native salmonids fishery- indirectly through growth of Sonoma County and directly through the dam.	*2.1*
		4	Commenter states that it focus on growth drives conservation; objects to the mindset that an engineering solution will solve a growth and conservation issue.	
		5	Commenter states that a holistic/ecological perspective needs to be applied to this project on the Russian River.	
G_Surf	Sonoma Coast Chapter of Surfrider Foundation	1	Commenter expresses concern on the impact to surfing areas at and south of the Russian River Mouth, which depend on the influx of new sand and gravel.	
		2	Commenter states that surfing locations are a prime example of low cost visitor and recreational opportunities and includes language from the California Coastal Commission enforcement program.	
		3	The commenter includes language from the California Coastal Act Section 30220 and states that the Project would reduce the potential surf areas by half in Sonoma County during the months proposed.	
		4	Commenter states that the mouth has usually been open during the summer over the last 100 years. Closing the mouth would result in loss of surf in this area, which is a significant impact to recreation and is inconsistent with the Coastal Act.	
		5	Commenter suggests mitigation measures for Impact 4.7.2 including opening and improving access to other surf areas in Sonoma County or construction of an artificial reef at the mouth.	*2.6*
		6	Commenter references the potential failure of the Project as stated on page 4.6-22 of the DEIR and states that the potential negative impact to surfers and salmon populations are greater than potential benefits.	*2.3*
		7	Commenter expresses concern about the increased presence of machinery on the beach impacting marine mammals and recreationalists.	
		8	Commenter requests that impact on the wave and water quality in the ocean environmental be analyzed in the DEIR. Commenter promotes actions to protect the salmon population.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
G_SWIG	Sebastopol Water Information Group, Jane Nielson	1	Concerned about separation of the DEIR from the Fish Flow Project and Dry Creek Restoration Projects.	*2.1*
		2	Concerned about the project's ability to re-create a reliable nursery for young fish.	*2.3; 2.4*
		3	Project must evaluate impacts on the lower river from lower summertime flows and changed flows from Dry Creek in order to evaluate the project's potential as a fishery nursery.	*2.1*
		4	Water quality data under the proposed lower river flows and closed lagoon conditions were only observed over a 29-day period and discussion in the DEIR are speculative.	*2.4; 2.7*
		5	DEIR assumes that "conditions" will remain within the range experienced over the past 15 years. Concerned about the projections based on "sparse data from the years 1996 to 2009" do not take climate change into consideration.	*2.7*
		6	DEIR should state the estimated life of the project. If the project fails to support increased populations of fish, when will the project end?	*2.3*
		7	DEIR needs to explore worst case scenarios including effects of rising ocean levels, and rapid climate change which could increase or lower the number of natural Estuary closures. The DEIR should discuss appropriate responses to multiple years with no natural Estuary closures.	*2.3*
		8	DEIR should discuss the effects possible mitigations of elongated drought periods on the Estuary.	*2.1; 2.4*
		9	A well monitoring program to track well salinity levels should be added to the project and discussed in the DEIR.	
		10	Monitoring related to the Fish Flow Project must be designed to sample the same sites and pollutants consistently and analyses must be provided for public review in a timely fashion.	*2.4*
		11	SWIG does not agree that the reduced project is an Environmentally Superior Alternative and suggests that the Habitat Restoration Alternative should be revised with the Estuary Management Project.	*2.5*
		12	Russian River Estuary is only a small part of the big picture and should be part of a broader program of tributary restoration.	*2.1*
G_TU	Redwood Empire Trout Unlimited, Brain Hines	1	Incorporates comments on NOP, submitted June17, 2010.	
		2	Objects to artificial breaching to protect 9 structures in Jenner, and resulting take of coho and steelhead. Expresses concerned that the 9 structures are comprised of 7 docks, 1 boathouse, and the State Parks Visitors Center. Is troubled that tax payers are subsidizing artificial breaching program which benefits the interests of 9 private property owners. Commenter expresses concern that juvenile Coho salmon raised in the Captive Coho Brood Stock Program are being killed by artificial Estuary breaching.	*2.3*
		3	Concerned that the Water Agency artificially breaches the Russian River Mouth using heavy equipment rather than natural occurrence.	
		4	DEIR is not adequate because it assumes that the artificial breaching is the baseline condition and the "no project alternative". No breaching should be the no project alternative and the environmentally preferred alternative.	*2.5; 2.7*
		5	Analysis and Estuary Management Plan should be extended to Monte Rio, which is the point where the river backs up to.	*2.2*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Organizations/ Groups (cont.)				
		6	Commenter states that the Water Agency is violating the Endangered Species Act by not implementing the Reasonably Prudent Alternative specified by NMFS, by taking salmonids when the Estuary is artificially breached.	*2.3*
		7	Recommends Estuary Management Project include, elevating structures that flood and end breaching, removing the jetty that is an obstacle to natural Estuary functioning, building habitat structure from jetty materials, extending Estuary Plan to Monte Rio and include restoration of new Open Space Lands.	*2.5*
		8	Recommends continual and expanded monitoring of Austin Creek for suitable migration and rearing habitat for salmonid species.	*2.2; 2.4*
		9	Commenters would like to see alternatives to the removal of the jetty.	*2.5*
		10	Restore the Open Space District properties in the Middle Reach/Bridgehaven area and similar low lying areas to create a flooded habitat.	*2.5*
		11	Would like to see the elevation, re-location or the removal of private properties that would flood be re-prioritized. Concern with the increase in water temperatures.	*2.5*
		12	Re-introduce historic native Estuary vegetation to the lower reach to further support and provide salmonid rearing habitat.	
		13	Request cost benefit analysis of existing conditions.	
Individuals				
NA_Ahlba, NA_Ahlvi; NA_Altho1; NA_Altma; NA_Ashle; NA_AtkinA; NA_Banch; NA_BenzW; NA_Bette; NA_Birkh; NA_Bley; NA_Blume; NA_Boddu; NA_BoyleK; NA_BoyleM; NA_Brand; NA_Bruni; NA_Burke; NA_Campb; NA_Charl; NA_Chyle; NA_Coate; NA_Conle; NA_Copel; NA_Cottr; NA_Cough; NA_Courn; NA_Culp; NA_Dane; NA_Dent; NA_Dorat; NA_Douga; NA_Ege; NA_Ehrha; NA_Elbe; NA_Elias; NA_Eliza; NA_Enoch; NA_Fahle; NA_Faulk; NA_Felci; NA_Fento1; NA_Fiore; NA_Flynn; NA_Fox; NA_Franc; NA_Gallo; NA_Getch; NA_Grady; NA_Greco; NA_Greig; NA_Guast; NA_Guido; NA_Hale; NA_Hall; NA_Hemmi; NA_Henri; NA_Holzh; NA_Irvin; NA_Jenni; NA_Jobin; NA_Johns; NA_Jones; NA_Kaufm; NA_Kelley; NA_Kolka; NA_Krame; NA_Krisk; NA_Krueg; NA_LaGra; NA_Larso; NA_Leer; NA_Long1; NA_Long2; NA_Lowe; NA_Lubbe; NA_Lundq;		1	Request contact information be added to distribution list.	
		2	Commenter utilizes the Russian River for recreational and personal uses.	
		3	Comment expresses concern with regards to the separation of the project from the Fish Flow Project. Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		4	Commenter states the entire project should be considered in one environmental document. Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		5	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_Molle; NA_MurphC1; NA_MurphJ; NA_MurphM; NA_Myers; NA_Naegl; NA_Narbu; NA_Niemc; NA_Nilso; NA_OCall; NA_Olesk; NA_Oldha; NA_Olson; NA_ORork; NA_Packe; NA_Pappa; NA_Parr; NA_Pedra; NA_Peter; NA_Petru; NA_Philp; NA_Potte; NA_Praeg; NA_Puig; NA_Winte; NA_Wood; NA_Wurr; NA_Zucke; NA_Randa; NA_Reyna; NA_Riabo; NA_Rose; NA_Rowe; NA_Rush; NA_Ruppe; NA_Schen; NA_Schmi; NA_Schub; NA_Shen; NA_Shere; NA_Sidbu; NA_Sobie1; NA_SobieS; NA_ Sorac; NA_ThomaA; NA_ThomaB; NA_Thomp; NA_Tranc; NA_Trapa; NA_ Vail; NA_WagneC; NA_WagneR; NA_Watki; NA_Watso; NA_Weins; NA_Whita		6	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		7	States during dry years the mouth of the river usually stays open.	*2.1*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*
		9	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
NA_Altho2	Sherrie Althouse & John Obertelli	1	Commenter utilizes the Russian River for recreational and personal uses. Expresses concern for water quality.	
		2	Questions how closing the mouth of the river to create a lagoon will improve river health.	
		3	Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		4	Concerned water quality impacts from the project will impact fish and wildlife habitat.	*2.4*
		5	DEIR should include a broad range of water quality studies.	*2.4*
		6	States the entire watershed health should be studied and managed. States the loss of riparian woodland, gravel mining, water diversions, pollution and sedimentation should be considered.	*2.2*
		7	Commenter would like to see continued environmental monitoring and analysis. Concerned with effectiveness of mitigation measures.	*2.4; 2.6*
		8	Commenters would like to be added to the notification list.	
NA_Anony	Anonymous	1	Not in favor of a closed Estuary and low flow on the Russian River.	*2.1*
		2	Concerned about water quality for fish and humans.	*2.4*
NA_AtkinD	Doreen Atkinson	1	Incorporates scoping comments for Fish Flow Project.	*2.1*
		2	Questions if low flow EIR includes an assessment of water quality violations.	*2.1*
		3	Questions if the Biological Opinion has to be enforced or if it is an opinion.	
		4	Questions why the Water Agency is not waiting to enforce a permanent low flow until NCRWQCB completes a comprehensive monitoring program?	*2.1*
		5	Questions motivation behind petition for low flow.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_Avery	Barbara Avery	1	Request contact information be added to distribution list.	
		2	Commenter utilizes the Russian River for recreational and personal uses.	
		3	Comment expresses concern with regards to the separation of the project from the Fish Flow Project. Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Habitat Flows and Water Rights Project.	*2.1*
		4	Commenter states the entire project should be considered in one environmental document. Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		5	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		6	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		7	States during dry years the mouth of the river usually stays open.	*2.1*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*
		9	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
		10	Concerned with why gravel mining is still allowed on the Russian River.	
		11	Concerned with outlet channel feasibility.	*2.3*
		12	Concerned with economic impacts.	*2.6*
NA_Barlo	Philip Barlow	1	Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		2	Suggest making a spillway across the existing railroad bedding south of the concrete jetty. Concerned with seepage through barrier beach due to blockage [jetty]. Suggest a channel crossing would be an appropriate method and questions if a channel cut has been considered.	*2.5*
NA_Burge	Vira Burgerman	1	Expresses concern with regards to silt in and along the Russian River.	
		2	Concern with invasive plant species and *Ludwigia*. Questions if there is a plan to eradicate *Ludwigia*, so more silt is not trapped and oxygen from the river is not depleted. Questions if *Ludwigia*, pesticides and herbicides are more prevalent in areas with agriculture run off.	*2.4*
		3	Questions if all river restoration groups and Community Clean Water Institute were contacted for input for the project.	*2.8*
		4	Questions how the Russian River will flush out silt, *Ludwigia*, toxins, pesticides and herbicides with a lower water flow. Questions if the new Estuary will trap build-up creating poor water quality.	*2.1*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		5	Concerned with the Dungeness Crab habitat and questions if the crabs will be able to get in and out of the mouth of the river. Questions if any studies were done.	
		6	Questions if local commercial and sport fisherman were contacted. Expresses concern with how this project could affect them.	
		7	Questions if the Wild King and Coho Salmon that were released in the Russian River are being monitored and what is the outcome of this release.	
		8	Question what aquatic life lives in the river and tributaries and who determines this.	
		9	Questions if the river turtles are being studied.	
		10	Questions if the gravel mining at Monte Rio and Casini Beach has been looked at in the DEIR.	*2.4*
		11	Concerned with water quality with regards to septic or toxic spill in the river.	*2.1; 2.4*
NA_Burr	Kimberly Burr	1	States the River's population was once the largest and most dominant source in the evolutionarily significant unit population. Concerned with species extinction and importance of this area.	
		2	Commenter states the entire project should be considered in one environmental document. States that the DEIR fails to address upstream factors. Asserts the Biological Opinion describes the interconnectedness of dam operations on the Estuary. Commenter asserts proper evaluation of dam operations is necessary in the DEIR and concludes that this was not done.	*2.1*
		3	DEIR should include a water budget. A water budget would benefit fish species and should included freshwater inputs and outputs.	*2.1*
		4	Commenter states that the lead agency left out important stream flow information by using inferior modeling.	*2.1*
		5	States that the DEIR does not address the take of freshwater from the system at different river segments. Asserts that the conclusions of the DEIR are not based on substantial evidence without a credible water budget analysis.	*2.1; 2.7*
NA_Copes	Vesta Copestakes Publisher	1	Express concern that the DEIR is too focused on the lowering river flow to mimic ancient history, believing that will solve fish problems.	*2.1*
		2	Concern with the *Ludwigia* blooms and other invasive plants growth in the river and tributaries.	*2.4*
		3	Asserts that the two reasons to lower flow on the Russian River. One is to allow the mouth of the river at Jenner to close and create fresh water conditions and to avoid flooding adjacent properties.	*2.1*
		4	Commenter asserts that there is no way to get the river to its pre-human influence state. Believes working with the current conditions and surroundings would be the best way to improve water quality.	*2.4*
		5	Commenter would like to see the artificial jetty in Jenner be removed so the river and ocean conditions can return to a more natural state.	*2.5*
		6	Commenter would like to see the water quality improved.	*2.4*
		7	Commenter would like to see the river looked at in its entirety.	
		8	Expressed concern for the entire watershed and its health.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_DeIon	Barbara DeIonno	1	Concerned Biological Opinion is narrowly focused. Questions if the Biological Opinion has been reviewed or certified by any other agencies.	*2.1*
		2	Concerned with low flow of the river being lowered. DEIR does not provide justification for low flow and explain it would damage recreation and water quality.	*2.1*
		3	Questions implementation of D1610.	*2.1*
		4	Questions Biological Opinion terminology. Questions if the Biological Opinion is someone's opinion or it if is based on science and studies.	
		5	Concern with low flow affecting water levels for swimmers.	*2.1*
		6	Concern with low flow affecting water levels for swimmers. States that 125cfs at Hacienda Bridge would provide an adequate amount for water recreation.	*2.1; 2.6*
		7	People of the lower Russian River depend on the river for recreation, lowering the flow would impact their recreation. Concerned with low flow impacts to business and other recreation.	*2.1; 2.6*
		8	Asserts that low flow causes algae blooms and plant growth in the riverbed.	*2.1; 2.4*
		9	Asserts that low flow will increase water temperatures, affecting salmon.	*2.1; 2.4*
		10	Low flow affects water quality. States the lower river has existing issues with high levels of bacteria.	*2.1; 2.4*
		11	Concerned with the impacts of low flow on fish species. States fish will have less area to swim, therefore more human interaction.	*2.1*
		12	Believes fish predators will have greater advantage because shallow waters are easier to see through.	*2.1*
		13	Commenter would like to see water flow remain at current level.	*2.1*
		14	Biological Opinion references affects to low flow on recreation.	*2.1*
		15	Commenter states that recreational boating is not the only activity on the river that requires water and that DEIR should include other recreational activities.	*2.1*
		16	Concerned with navigability for canoes/kayaks under low flow conditions.	*2.1*
		17	Asserts the most of the river beaches are not behind dams.	*2.1*
		18	Some areas behind dams are not suitable for swimming.	
		19	Concerned with low flow in regards to beach impacts and related facilities.	*2.1*
		20	Questions Biological Opinion terminology. Feels the recreational scene is being dismissed and there is a lack of input from those who it affects.	
		21	Questions Biological Opinion mandate that the Water Agency implement low flow.	*2.1*
		22	Asserts that the cultural resources, recreation, and nature are valuable.	*2.1*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		23	Believes it is not necessary for the Estuary Management Project to lower the flow of the entire river. Suggest other alternatives to reduce water flow.	*2.1*
		24	Expresses concern for the gravel-mining project impact on the fish habitat.	*2.1*
		25	Believes more research could have gone in to the Biological Opinion.	*2.3*
		26	Concerned with the breaching of the sandbars with bulldozers being to disruptive to seals and fish.	
		27	Believes bulldozing the sandbars will be a sudden change for animal habitat.	
		28	Biological Opinions recommends a closed lagoon.	
		29	Concerned with overflow of the Estuary to the ocean and ocean influence on Estuary.	
		30	Believes moving sand at the mouth of the river has not been successful in the past and is concerned with channel erosion.	*2.3*
		31	Express concern for habitat at the mouth of the river. Questions if seals and fish would be harmed by the Estuary.	
		32	Questions water quality at the mouth of the river. Expresses concern for habitat at the mouth of the river.	*2.4*
		33	DEIR lacks information on recreation. Concerned with how much of the beaches will be covered with water.	
		34	DEIR lacks information on recreation. Commenter concerned with the lack of information available for decision makers.	*2.2; 2.6*
		35	Commenter would like to see the upstream impacts of the river looked at. The entire project should be considered in one environmental document.	*2.2*
		36	Commenter would prefer the use of no bulldozers. Questions if the removal of the jetty should be studied. Commenter suggests restoration of tributaries, removing impediments to fish migration and ensuring tributaries have adequate amounts of water.	*2.5*
		37	Commenter notes article in newspaper highlighting Mark West Creek. Asserts Mark West Creek used to be a major spawning and rearing area which is now running dry.	*2.2*
NA_Defoy	S. Defoy	1	Commenter opposes project and low flow.	*2.1*
		2	Concerned with water quality and algae growth impacts to fish and people.	*2.4*
NA_Fento2	Kate Fenton & Lenny Weinstein	1	Commenter questions if the jetty removal jetty has been considered. Asserts this would be more cost effective.	*2.5*
		2	Commenter states the entire project should be considered in one environmental document.	*2.1*
		3	Questions if low flow will dilute toxins that would kill migrating salmon.	
		4	Commenter would like to know when water quality studies will be available to the public.	*2.4*
		5	Questions why water quality is only being studied as far upstream as Duncans Mills.	*2.2*
		6	Questions where the graphic images of the planned outlet channel can be viewed.	
		7	Asserts that the project will be unsuccessful due to water quality.	*2.3; 2.6*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_Filip	Deborah Filipelli	1	Comment expresses concerns regarding to the separation of the project from the Fish Flow Project. Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		2	Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		3	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		4	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		5	States during dry years the mouth of the river usually stays open.	*2.1*
		6	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*
		7	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
NA_Flynn	Barbara Ann Flynn	1	Request contact information be added to distribution list.	
		2	Commenter utilizes the Russian River for recreational and personal uses.	
		3	Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		4	Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		5	States that the Estuary Management Project only analyzes impacts to Duncans Mills. DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		6	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		7	States during dry years the mouth of the river usually stays open.	*2.1*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	
		9	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
		10	Commenter has been involved in other fish and wildlife restoration efforts and does not support the project.	*2.3*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_Hales	Martha Hales	1	Request contact information be added to distribution list.	
		2	Concerned with flow changes and impact on recreation, invasive species, and to other species.	*2.1; 2.4*
		3	Comment states the entire project should be considered in one environmental document.Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		4	Requests monitoring and analysis of recreation, public health, and economic impacts.	*2.6*
		5	Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		6	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		7	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		8	States during dry years the mouth of the river usually stays open.	*2.1*
		9	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	
		10	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
NA_Herr	David Herr	1	Asserts that the mouth of the Russian River should not be artificially and mechanically opened.	
		2	Entire project should be considered with flow project in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		3	Asserts that the mouth of the river is impeded by cement barrier naturally which keeps the opening closed.	*2.5*
		4	Disagrees with flood control for 2-3 structures.	*2.5*
		5	Asserts that artificially opening the mouth of the river is destructive to wildlife (harbor seals).	
		6	Questions low flow. Asserts that the mouth of the Russian River should not be artificially and mechanically opened.	*2.1*
		7	States that past projects failed to protect the fish.	*2.1; 2.3*
		8	Concerned with low flow and impacts on temperature increase and invasive plant growth.	*2.1; 2.4*
		9	Disagrees with gravel mining project, tree removal, vineyard, and sedimentation.	
		10	Commenter would like to see a project that would benefit the fish habitat.	*2.3*
NA_Jelli	Norma Jellison	1	Commenter asserts that DEIR fails to acknowledge impacts to Goat Rock State Beach. States the beach area is heavily used by people.	
		2	Concerned that water levels up to 9 feet in some locations would inundate riverside beaches.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		3	Questions how the loss of recreation opportunity at Goat Rock State Beach is not a significant impact to the people who utilize this area.	
		4	DEIR does not identify impacts to beach loss for people below the rivers end. Questions how this impact is not significant.	
		5	Concerned the restricted access to recreations sites or modification to existing recreational resources would impacts the visitors.	
		6	Concerned with the lost of public states and impacts it could cause.	
		7	Concerned with impacts to boaters and kayakers in regards to beach areas. Questions why this is not a significant impact.	
		8	Asserts that impacts to Harbor seals are inadequately assessed and question method of analyzing impacts.	
		9	States that the Jenner colony of seals is the largest and most significant Harbor seal colony in Sonoma County. Harbor seals are easily disturbed by natural and concerned how the Estuary Management Project could disturb them.	
		10	States that IHA protocols cannot mitigate impacts to the disruption of the seals. States long term disturbance to seals can result in reduced use of site, a shift to nocturnal rather than diurnal feeding, and reduced pup production.	
		11	Questions how distribution impacts to the seals can be less than significant.	
		12	Questions how the IHA protocols were used to find less than significant impacts.	
		13	Concerned with ongoing disturbances with beach walkers to seals during the creation of the Estuary.	
		14	Questions harassment protocols.	
		15	States that the impacts on birds are inadequately assessed. States the Goat Rock Beach provides a resting place for birds. States birds are as easily disturbed as seals.	
		16	Questions why no assessment was made of the impacts of prolonged closures of the river mouth on the flushing of birds.	
		17	Concerned with the impacts to birds as a result of flushing created by the project.	
		18	Impacts on water quality are inadequately assessed.	*2.4*
		19	Asserts that the DEIR is not comprehensive as to assessing the impacts of modifying D1610 and the Estuary Management Project.	*2.1*
		20	Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		21	DEIR concludes that the Russian River is not listed under the Clean Water Act as impaired for nutrients. States nutrient levels can be too high for fish even thought the Russian River is not listed as impaired	*2.4*
		22	Concerned with algal blooms in recent years.	*2.4*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		23	States the North Coast Water Resources Board has arranged nutrient testing during the summer of 2011.	*2.4*
		24	Concerned with low flow water quality with regards to high bacteria levels and algae blooms.	*2.1*
		25	Concerned with flow change and impacts it may have on the environment and recreation boating.	*2.1*
		26	Expresses concern for lack of analysis on the impacts of the Estuary Management Project created lagoon and associated water quality impacts. Concerned with increase of bacteria levels and nutrients.	*2.4*
		27	Concerned an increase in water temperature and bacteria may impact fish species in the lower river.	
		28	States that the DEIR fails to assess the creation of a prey environment. Concerned salmon being preyed on.	
		29	Concerned that the Estuary will becoming a feeding ground, concerned that salmon will be targeted.	
		30	Express concern for salmon in the Estuary and questions what will be done protect them.	
		31	Questions how the success of the project will be evaluated and the time frame for this.	*2.3*
		32	Concerned with the long term impacts of the project on the ecosystem. Questions impacts of sea level rise.	
		33	Concerned that state beaches and other recreational resources are being lost.	
		34	Concerned with seal habitat loss.	
NA_Johnc	John Johnck	1	Commenter states that the DEIR does not study the effects on the river at SHP.	*2.2*
		2	Questions why the DEIR ignores the 8 foot depth in the Estuary. Suggest the DEIR include Summerhome Park river frontage and an 8 foot depth at the Estuary.	
		3	Suggest the DEIR include SHP river frontage and an 8 foot depth at the Estuary.	
NA_KarciA	Andrew Karcie	1	Concerned low flow on the river will cause algae growth and cause poor water quality.	*2.4*
NA_KarciP	P Karcie	1	Commenter is opposed to the project.	*2.1*
		2	Concerned low flow on the river will cause algae growth and cause poor water quality.	*2.4*
NA_KarciZ	Karcie	1	Commenter is opposed to the project.	*2.1*
		2	Concerned low flow on the river will cause algae growth and cause poor water quality.	*2.4*
NA_Kenne	Jay Kennedy	1	Project is an experiment; questions why the Water Agency guesses when there are other proven restoration examples in other west coast locations.	*2.3*
		2	Believes non-profit organizations can help the river recovery for free.	
		3	Believes removing the concrete wall at the mouth of the river will return river to a natural state could be beneficial to for the fish habitat. States that the proposed plan will help invasive species thrive in the Estuary. Does not believe water quality will improve.	*2.5*
		4	Believes fish will return if the river by cleaning creek beds that were damaged by development and logging.	*2.3*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
NA_Kersn	Scott Kersnar	1	Concerned with the narrow focus of the DEIR and impacts on the three fish species. Concerned with stream condition and water quality challenges.	*2.3*
		2	Commenter questions if other example Estuary enhancements projects contain the same upstream wastewater discharge as the Russian River. Questions overall health issues, water quality and flows of those rivers.	*2.3; 2.4*
		3	Concerned with engineering feasibility and integrity of the sand barrier.	*2.3*
		4	Questions why the project does not require the removal of the existing jetty to reestablish a more natural state.	*2.5*
		5	Questions why the project does not consider raising flood waters to Jenner.	*2.5*
		6	Questions what mitigation the project envisions to avoid violation of Coastal Commission protections.	*2.6*
		7	Concerned with welfare of juvenile salmonids in conflict with harbor seals.	
		8	Questions why the project does not require the Water Agency to actively cooperate with efforts to restore the Russian River tributaries.	
		9	Question why the project does not address negative impacts to flooding, increase of algae to upstream beaches. Questions if studies have been done to verify the upstream degradation due to reduced flow.	*2.1; 2.2; 2.4*
		10	Concerned that the project will not have a net positive effect on fish species.	2.4
		11	Believes that the project ignores the overall health of the river.	
NA_Marti	Donald Martin	1	Request contact information be added to distribution list.	
		2	Commenter utilizes the Russian River for recreational and personal uses.	
		3	Comment expresses concern with regards to the separation of the project from the Fish Flow Project. Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		4	Comment states the entire project should be considered in one environmental document. Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		5	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		6	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1, 2.4*
		7	States during dry years the mouth of the river usually stays open.	*2.1*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		9	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
		10	States that project will fail and the best option is to remove jetty.	*2.5*
		11	DEIR should include mitigation for impacts to surfing.	*2.6*
		12	DEIR should consider all upstream issues.	
		13	Suggests idea for the removal of the jetty.	
NA_MurphC2	Charles Murphy	1	Commenter is in favor of closing the mouth of the river.	
		2	Asserts flood management should not be a part of project.	*2.3; 2.5*
		3	Suggests building a permanent dam with a removable section.	*2.5*
		4	Seals leave when barrier beach is closed.	
		5	Opposed to low flow for flood management. Concerned how low flow will impact recreation, and water quality.	*2.1*
NA_OLear	Dennis O'Leary	1	Requests contact information be added to distribution list.	
		2	Questions why Sonoma County Water Agency is the lead agency for this project. Believes there is a conflict of interest.	
		3	DEIR should give the “No Future Estuary Management” alternative serious consideration.	*2.5*
		4	DEIR fails to mention that area septic systems are in violation of current law and face future compliance or abatement action.	
NA_Sklen	Carol Sklenicka	1	Asserts project is trial and error.	*2.3*
		2	Concerned that the DEIR does not consider the impacts of temporary and permanent low flow of the river. Disagrees with low flow for flood management.	*2.1*
		3	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.1*
		4	Separation of low flow project ignores evidence that it will be destructive to habitat and recreation,	*2.1*
		5	Concerned with the accuracy of the water quality data. States EPA has recently requested the need for more specific water quality data regarding the impacts of urban run-off.	*2.4*
		6	Concerned with the impacts above Vacation Beach of raising the Estuary levels and lowering flow.	*2.1*
		7	Would like to see the process reevaluated from the beginning.	
NA_Sobie2	Mary Anne Sobieraj	1	States the Russian River has extensive agricultural and urban influence which differs from other cited Estuary examples.	*2.3*
		2	Suggests the DEIR is based on faulty premise with regards to a freshwater lagoon.	*2.3*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		3	Questions metrics the Water Agency will use to determine the success or failure of the Estuary project.	*2.3*
		4	Concerned with the increase of bacteria and pathogen levels. Concerned with high level bacteria.	*2.4*
		5	Concerned with the impact of increasing water temperatures in the Estuary.	
		6	Questions why the cumulative effects were not discuss and evaluated.	
		7	Questions the evaluation the Estuary Management Project.	*2.1*
NA_Sukov	Darrell Sukovitzen	1	Questions who will be responsible for the monitoring of changes in wave action at the mouth of the river.	
		2	Questions what actions will be taken to avoid changes to the configuration of submerged sand.	*2.6*
		3	Requests data on wildlife and human presence.	
		4	Questions why the pinniped monitoring done was not been made available for public review prior to the close of the comment period.	
		5	Concerned with the reason data is not available on the pinniped population.	*2.7*
		6	Questions what studies have been done and concerned with the impacts on wildlife.	
		7	Questions what studies have been done and concerned with impacts on the land and aquatic plant life.	
		8	Concerned with the impacts to the migratory population at the mouth of the river.	
		9	Expresses concern for the seals with regards to construction equipment.	
		10	Concern with impacts to Penny Island and questions if studies have been done.	
		11	Questions what studies have been done in regards to aquatic species. Questions the impacts to salmonids and other wildlife migrating up Jenner Creek, Sheephouse Creek, Slaughterhough Creek, Austin Creek and Dutch Bill Creek.	
		12	Concerned with impacts to upstream islands and questions what studies have been done.	
		13	Questions if a complete list of plant, bird and aquatic life have been completed for the species inhabiting the area around Jenner marsh.	
		14	Questions impacts of intrusive predation on salmonid and other sea life in the Estuary and upstream.	
		15	Question why the impacts of silt runoff from vineyard has not been analyzed in the DEIR.	*2.4*
		16	Questions why the affect of fertilizers and chemicals used by the agricultural industry were not analyzed in the DEIR in regards to water quality. Questions how chemicals could impacts fish species.	
		17	Questions how jetty removal would alter by the proposed project.	*2.5*
		18	Concerned with impacts of red tides on the Estuary.	*2.4*
		19	Questions effect of fluorescent algae as a result of the project.	*2.4*
		20	Questions if analysis of water conditions have been completed for the Estuary and beach locations.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		21	DEIR should address impacts of summer dams and fish ladders.	
		22	Question if the project will proliferate invasive aquatic plant species.	*2.4*
		23	DEIR does not address the alternatives Analysis regarding the introduction of fungicides, herbicides and pesticides into the Russian River.	
		24	Concerned with the accumulation of mercury in the Estuary.	*2.4*
		25	Concerned with the effects of a potential chemical spill.	
		26	Commenter states the entire project should be considered in one environmental document.	*2.1, 2.7*
NA_Sulli	Daniel Sullivan	1	Request contact information be added to distribution list.	
		2	Commenter utilizes the Russian River for recreational and personal uses.	
		3	Comment expresses concern with regards to the separation of the project from the Fish Flow Project. Commenter states the purpose of both projects is to fulfill the requirements of the Biological Opinion. Concerned Estuary Management Project is separate from the Fish Flow Project.	*2.1*
		4	Comment states the entire project should be considered in one environmental document. Entire project should be considered in one environmental document because low flow is linked to the Estuary Management Project through the Biological Opinion.	*2.1*
		5	DEIR project area only analyzes impacts to Duncans Mills even though DEIR state impacts affect the river as far upstream as Vacation Beach.	*2.2*
		6	Expresses concern in regard to flow at Hacienda during wet years. Project is only viable during drought years when water quality impacts would be greatest.	*2.1; 2.4*
		7	States during dry years the mouth of the river usually stays open.	*2.1*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*
		9	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Final EIR.	*2.4*
		10	Comment implies the project is proposed to further a “hidden agenda” and that water management is made up.	
NA_Urbin	Cynthia Urbina	1	Comment asserts Estuary Management Project is an experiment that may never work. Comment asserts DEIR should consider logging, gravel mining, vineyards, pharmaceuticals from wastewater and chemical pollutants.	*2.3*
		2	Comment states that DEIR conclusion is that impact to surfing is significant and unavoidable, harbor seals leave when water is high, and that river beaches will be inundated. DEIR does not included economic impacts. Comment states that combination of low flows and a closed Estuary system would create high level of pollutants and could impact public health related to swimming.	*2.1;2.6*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Individuals (cont.)				
		3	Comment asserts DEIR must assure Jenner houses will not flood and questions if the Water Agency will open mouth at 10 feet. Requests results of 2010 implementation. DEIR must tell where the water from lowering flow will go.	
		4	DEIR must address logging, vineyard production, and low flow.	*2.1*
NA_Wikle	Victoria Wikle	1	Austin Creek to Vacation Beach is impacted with high water levels, lack of flow, degraded water quality. DEIR must address improving poor water quality.	*2.2; 2.4*
		2	Concerned with river low flow and flow rates.	*2.1*
NA_ZimmeD NA_ZimmeM	Dana Zimmerman Marilyn Zimmerman	1	Add name and address to notification list.	
		2	Concerned about separation of Estuary Management Project DEIR from the Fish Flow Project. CEQA requires entire process to be considered in one environmental document.	*2.1; 2.7*
		3	Prefer Reduced Project Alternative. No buildings would be flooded at this level, making low flow unnecessary.	*2.1; 2.5*
		4	Concerned with water quality and recreational impacts from low flow.	
		5	Concerned about water quality from decreased water flow, including possible added pollution from nutrients, toxins, bacteria, temperature, and invasive species.	*2.1; 2.4*
		6	Concerned monitoring studies in 2009 were inadequate and the 2010 results not made available to Water Quality Control Board or public. Unacceptable that studies will not be available in Flow EIR.	*2.4*
		7	In 2009 several locations tested positive for *Enterococcus*. Only other recorded incident was July 2002 for *E. coli*, corresponding to a documented sewage spill from Santa Rosa.	*2.4*
		8	Preferred project maintains Estuary levels at 8 feet. No buildings would flood at this level, making low flow unnecessary.	*2.5*
Public Hearing				
H_Waters	Suki Waters	1	Comment states that the Estuary is a “living classroom”.	
		2	Commenter recalls from memory the historical mouth location and past influence from gravel mining and dredge projects; asserts the current mouth location is not historic. Comment refers to the jetty and natural percolation that historically occurred through the barrier beach.	
		3	Comment asserts that the jetty is being managed as well as possible but should be removed.	*2.5*
		4	Comment addresses sea level rise.	
		5	Commenter asserts the mouth of the river is now affected by things not originally part of the natural conditions and asserts that river mouth may have closed more often.	*2.1*
		6	Comment asserts DEIR should consider flow and Estuary Management Project in one environmental document.	*2.1*

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Hearing (cont.)				
H_Sukov	Darrell Sukovitzen	1	Comment questions if comments provided during the public facilitating committee will be included in the EIR record.	
		2	Commenter states that he attended two of three scoping meetings.	
		3	Commenter questions what the Water Agency will do with water not released to achieve low flow conditions.	*2.1*
		4	Comment asserts DEIR should address effect of fungicides, herbicides, pesticides from drift air, or runoff from vineyards.	
H_Adelm	Brendan Adelman	1	Comment asserts DEIR should consider flow and Estuary Management Project in one environmental document.	
		2	Asserts NMFS scoping comment letter recommends analyzing flow and Estuary Management Project.	
		3	Comment regarding project area.	*2.2*
		4	Refers to 2009 Photo Report.	
		5	Comment asserts purpose of low flow is to avoid flooding of low-lying properties.	*2.1*
		6	Comment expresses concern for impacts associated with low flow, including bacteria, nutrients, algal blooms, *Ludwigia* mats, and blue-green algae.	*2.1; 2.4*
		7	Comment asserts baseline data is inadequate and that inadequate data is used to justify inability to mitigate impacts.	*2.6*
		8	Comment disagrees with DEIR conclusion that water quality impacts are less than significant because the river is not listed for nutrient impairments under the Clean Water Act and because the project would serve beneficial uses.	*2.4*
		9	Comment mentions massive algal bloom.	*2.4*
		10	Comment asserts Public Hearing presentation did not mention that the river is listed on the 303(d) list for temperature.	*2.4*
		11	Commenter asserts DEIR does not address toxins in the anoxic zone or interchanges that might occur as a result of changes in the anoxic zone.	*2.4*
		12	Comment asserts DEIR contains inconsistencies and repetition.	
		13	Comment is concerned with se of the term “natural”.	*2.4; 2.7*
H_Hardy	Dian Hardy	1	Project overlooks overall ecology at the mouth of the Russian River; focuses only on habitat for endangered salmonids and overlooks harbor seal haulout, resting and foraging site for migratory birds, and fishery for Dungeness crabs. DEIR recognizes a variety of aquatic and terrestrial species rely on estuarine habitat for some or all of their life phases.	
		2	Recommends a holistic perspective to consider human impact on natural systems, i.e. Warm Springs Dam impact on native fishery and resulting population growth and agriculture, forestry, gravel mining, and residential and commercial development. Concern with scope of authority of the Endangered Species Act.	
		3	Comment asserts DEIR should take a more holistic approach.	
H_Jelli	Norma Jellison	1	Range of aquatic and terrestrial species should be addressed in the DEIR	
		2	Comment disagrees with DEIR conclusions with the determination that creation and maintenance of the lagoon outlet channel would be less than significant to pinnipeds.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Hearing (cont.)				
H_DeIon	Barbara DeIonno	1	Comment is opposed to low flow since the Estuary Management Project is not dependent on flow.	
		2	Comment asserts that Biological Opinion does not address water quality (temperature increase) damage associated with low flow.	*2.1*
		3	Comment asserts there is less fish habitat under low flow conditions.	*2.1*
		4	DEIR does not address impacts to swimming.	
		5	The Estuary Management Project needs intended to balance all interests on the Russian River.	
		6	Comment asserts project seems good for fish but that additional studies for other species are needed.	
H_Copes	Vesta Copestakes	1	Commenter concerned with river flow and relationship to flood control for low-lying properties.	*2.1*
		2	Comment asserts low-lying properties at risk for flooding should be raised.	*2.5*
		3	Comment asserts all EIRs and studies should be considered in one environmental document.	*2.1*
		4	Comment asserts DEIR should address upstream influences including failing septic tanks, vineyards, and other chemical inputs.	
		5	Comment states that the natural flow of the river is unknown, and that natural condition would result from jetty removal.	*2.5*
H_Frey	Mike Frey	1	Sonoma Coast Surfrider comments that the DEIR does not address impacts on surfing activities.	*2.6*
		2	Comment cites California Coastal Act Section 30213, protecting lower cost recreational facilities; 30220, protecting water-dependent recreational activities.	*2.6*
		3	Comment concerned that no mitigation is provided to mitigate impacts to surfing.	*2.6*
		4	DEIR has not addressed needs of the local surfers.	*2.8*
		5	DEIR does not contain baseline data for E. coli and nutrients at the mouth of the river and that no monitoring has been conducted. Comment also asserts analysis should extend beyond Duncans Mills.	*2.2; 2.4*
		6	Comment supports jetty removal.	*2.2; 2.5*
		7	Commenter opposes fortifying coast and providing flood management for low-lying properties.	*2.2, 2.3*
H_Hanso	Larry Hanson	1	Commenter states river mouth environment is dynamic, but three processes unnatural, including manipulated flows released from Warm Springs Dam, the jetty structure, and low-lying properties that require low flows.	
		2	This response assumes the comment refers to the 2010 implementation of the lagoon outlet channel.	*2.5*
		3	Commenter opposes artificial breaching.	*2.1*
		4	Comment asserts jetty and dam removal must be removed.	
		5	Comment asserts low flow should not be implemented to provide flood management.	*2.1; 2.4*
		6	Commenter concerned with continued harassment to wildlife, and water quality impacts from implementing low flow.	

TABLE 1 (Continued)
COMMENT ISSUES SUMMARY

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
Public Hearing (cont.)				
H_Yeate	Thomas Yeates	1	Comment regarding public process.	*2.8*
		2	Future presentations should incorporate all knowledge of river.	*2.8*
		3	Presentation should include analyses, actions to discover the causes, and mitigation.	*2.6*
		4	Comment asserts real issue is upstream influence from logging, dams, pesticide runoff.	
		5	Questions amount of public outreach and use of the public knowledge.	
		6	Comment asserts there are other issues affecting fish beyond what the Estuary Management Project is intended to solve.	
		7	Requests update on 2010 lagoon outlet channel implementation.	
H_Furch	Rue Furch	1	Comment questions if project will achieve goal.	*2.3*
		2	DEIR should address algae as a function of low flow.	*2.1; 2.4*
		3	DEIR should look at issues upstream, including pollutant inputs that affect the river.	*2.2, 2.4*

CHAPTER 2
Master Responses

Some topics in the Russian River Estuary Management Project Draft Environmental Impact Report (EIR) received multiple comments. In order to provide a thorough response on these topics, master responses have been prepared that present a comprehensive discussion of the key items of interest to the commenters. For a list of the individual comments, please refer to **Table 1**, Chapter 1, Summary of Issues Raised by Commenters. Response to each individual comment is provided in Chapter 3, Response to Comments. In the event that one of these major topics is raised in an individual comment, where appropriate, a brief response is provided and the commenter is referred to the following master responses for a complete discussion.

2.1 Relationship to Other Biological Opinion Elements

Introduction

This section addresses comments regarding analyzing the Russian River Estuary Management Project independently of other elements in the Russian River Biological Opinion, including comments stating that by not analyzing the entire Russian River Biological Opinion, specifically the Fish Habitat Flows and Water Rights Project (Fish Flow Project), the Water Agency is "piecemealing" the analysis.

Overview of Issues Raised by Commenters

- All elements of the Russian River Biological Opinion are linked and should be considered as a single "project" under CEQA.[1]
- Separation of the Estuary Management Project from the Fish Flow Project is inconsistent with CEQA.
- Project objectives of Estuary Management Project and Fish Flow Project are the same, and therefore should be considered in one environmental document.
- Objective of the Fish Flow Project is flood prevention.
- The Estuary Management Project requires low summertime Russian River flows.
- The impacts associated with the Estuary Management Project could be exacerbated by implementation of the Fish Flow Project and all impacts should be addressed in this Draft EIR.

[1] CEQA is defined as the California Environmental Quality Act.

- The Russian River Biological Opinion states that low flow is required for the Estuary Management Project and therefore both projects should be considered in the same document.

Discussion

The 2008 NMFS Russian River Biological Opinion requires that the Water Agency and the United States Army Corps of Engineers (USACE) take a series of actions[2] throughout the Russian River watershed between 2008 and 2023. The required actions are intended to avoid jeopardizing populations of listed[3] steelhead and coho salmon and their critical habitat and to improve conditions for these listed fish species. However, each required action has independent utility; any specific required action does not lead to, follow from, or make any other action more likely. Each action must be carried out at a different time and at a different location. Each has already been subject to or will be subject to its own separate environmental reviews and permit requirements.

The Russian River Biological Opinion requires that the Water Agency change its stream maintenance program, enhance Dry Creek fishery habitat, change its Estuary management practices, and request modifications to state-mandated minimum instream flow requirements. All of these required actions are intended to improve conditions for listed salmonids, but each is independent.

For example, the Russian River Biological Opinion requires that the Water Agency change the way it managed more than 200 miles of natural and engineered stream channels throughout Sonoma County so that those channels provide improved conditions for listed fish species while still providing flood protection. In 2009, the Water Agency completed an environmental impact report for its revised stream maintenance program and approved the revised program. The Water Agency obtained all necessary permits, and is now carrying out the revised stream maintenance program. The Russian River Biological Opinion also requires a series of actions on Dry Creek, the 14-mile long tributary to the Russian River into which Warm Springs Dam water is released. The Russian River Biological Opinion concluded that the releases create high velocity flows harmful to listed salmonids and requires the Water Agency to improve habitat over 6 miles of Dry Creek channel over a 12 year period. The Water Agency has released an Initial Study and Mitigated Negative Declaration for a Dry Creek habitat demonstration project and will complete appropriate CEQA analysis before implementing the demonstration and future habitat enhancement projects. The Russian River Biological Opinion also requires that the Water Agency study the feasibility of using a pipeline for water supply flows to bypass Dry Creek in case habitat enhancements do not provide the expected improvements to habitat within Dry Creek. Completion of the appropriate level of CEQA documentation would be required for implementation of such a pipeline.

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2 The Russian River Biological Opinion identifies these actions as Reasonable and Prudent Alternatives (RPAs). So long as the Water Agency is in compliance with the Russian River Biological Opinion and carrying out the RPAs, it is avoiding jeopardizing the continued existence of listed salmonids and their critical habitats and allowed to incidentally 'take' listed species and still be in compliance with the Endangered Species Act.

3 Under the Endangered Species Act, fish may be 'listed' as threatened or endangered.

The Estuary Management Project and the Fish Flow Project (described in Draft EIR Chapter 5.0, Cumulative Analysis, Section 5.2.4) are two additional projects required by the Russian River Biological Opinion, and similarly are independent and subject to separate environmental review. They have different objectives, are to be implemented at different times in different locations, have separate environmental impacts, and are subject to approvals of different regulatory agencies. Implementation of each project is a separate requirement of the Russian River Biological Opinion and as such, the implementation and success of one project is not predicated on the implementation and success of another project.

The separateness of the two projects is shown by evaluating the following factors:

- **Timing:** The Russian River Biological Opinion requires a wide range of Water Agency and USACE activities through 2023, and the Russian River Biological Opinion requires completion of these activities over varying timelines. The Russian River Biological Opinion requires that the Estuary Management Project be carried out immediately. In contrast, the Russian River Biological Opinion requires that the Water Agency complete a final EIR for the Fish Flow Project by September 2013 and does not anticipate that the State Water Resources Control Board will act to change the minimum instream flows until about 2014 to 2016.[4] The Water Agency has petitioned the State Water Resources Control Board to change minimum flows and issued an NOP for the Fish Flow Project EIR, as required by the Russian River Biological Opinion, and is preparing a draft EIR. Tying the two projects into one EIR would have prevented the Water Agency from meeting the Russian River Biological Opinion requirement that the Estuary Management Project be implemented immediately.

- **Regulatory Approvals:** The two projects do not require the same regulatory approvals. The Estuary Management Project requires permits from the California Department of Parks and Recreation, California Coastal Commission, California State Lands Commission, California Department of Fish and Game, and North Coast Regional Water Quality Control Board. The Water Agency must complete the CEQA process in 2011 in order to maintain these permits. The Fish Flow Project, on the other hand, cannot be carried out without extensive changes to the Water Agency's state water rights approved by the State Water Resources Control Board, which must hold public hearings before issuing a decision. The Fish Flow Project does not require permits from California Department of Parks and Recreation, California Coastal Commission or the California State Lands Commission, and the State Water Resources Control Board is not required to issue any water rights approvals for the Estuary Management Project.

- **Location**: The Estuary Management Project has effects only from the mouth of the Russian River to Vacation Beach, approximately 14 miles upstream. The Fish Flow Project, on the other hand, affects instream flows over the majority of the Russian River and Dry Creek.

[4] The Russian River Biological Opinion recognized that changing D1610 minimum instream flow requirements would require filing a petition to change D1610 with the State Water Board, completing a multi-year EIR, and a State Water Board hearing process, and that this process would require 6 to 8 years to complete. (NMFS 2008, page 243)

To the extent that these geographic areas overlap or result in or have overlapping impacts, these impacts are discussed in the Draft EIR Chapter 5.0, Cumulative Impacts.[5]

- **Objectives:** The Estuary Management Project's purpose is to change the way the Water Agency manages the Estuary during the lagoon management period, so that the Water Agency can improve Estuary conditions for rearing juvenile steelhead while continuing to provide flood control protection. The Fish Flow Project's purpose, on the other hand, is to reduce minimum instream flows through different reaches of the Russian River and Dry Creek, in order to enhance various salmonid life stages currently affected by the velocity of the flows.

  The sharing of an overall objective, to avoid jeopardizing populations of listed steelhead and coho salmon and their critical habitat, and to improve conditions for these listed fish species, does not negate the independent utility of the Estuary Management Project to provide enhanced juvenile salmonid rearing habitat within the Estuary.

- **Relationship Between Projects:** The Estuary Management Project will govern the Water Agency's breaching of the Estuary under all foreseeable instream flow conditions, with or without the instream flow levels proposed by the Fish Flow Project. The Water Agency has been managing water levels in the Estuary through breaching since 1995. At the times the Water Agency has breached the Estuary to prevent flooding, instream flows in the Russian River have ranged from 77 cubic feet per second (cfs) to 1,250 cfs. Although the Water Agency is required by the State Water Resources Control Board to maintain *minimum* flows in the Russian River, flows often greatly exceed the prescribed minimums due to natural flow from unmanaged tributaries on the river. Thus, depending on the year type and season, instream flows into the Estuary are, and will continue to be, a combination of natural runoff and releases from storage. The Estuary Management Project was developed to govern the Water Agency's breaching activities under all flow conditions, regardless of the level of instream flows, and does not require or make more likely any changes to the existing minimum instream flows. The Fish Flow Project, on the other hand, proposes to reduce the level of flows in the Russian River and Dry Creek. Under the Fish Flow Project, flows into the Estuary could be lower in some years, depending upon the extent of natural runoff and tributary flows. Reduced minimum flows in the river, and the resultant possible reduced flows into the Estuary, if approved by the State Water Resources Control Board, may make it easier for the Water Agency to maintain the water levels identified in the Russian River Biological Opinion as beneficial in some years.[6] However, these lower flows are not required in order for the Estuary Management Project to be carried out. The Water Agency must carry out the Estuary Management Project regardless of whether lower minimum Russian River flows are ever approved by the State Water Resources Control Board. The Estuary Management Project, as designed and as evaluated in the Draft EIR, is feasible with or without the reduced minimum flows proposed by the Fish Flow Project. Accordingly, the individual impacts of the Fish Flow Project need not be described in this EIR. The cumulative effects of both projects are analyzed in Draft EIR Chapter 5.0, Cumulative Analysis.

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5 CEQA Guidelines Section 15156 explains: *"Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment on the cumulative effect."*

6 As noted in the Draft EIR Chapter 3.0, Project Background and Environmental Setting, page 3-3, however, ocean wave conditions have a significant influence over when the Estuary closes and opens, and such ocean conditions are wholly unrelated to the level of flows coming into the Estuary.

Comments stating that the Estuary Management Project depends upon the Fish Flow Project or makes the Fish Flow Project necessary misunderstand the fundamental nature of the Estuary Management Project. The Estuary Management Project has two fundamental objectives – flood protection and enhancing juvenile salmonid habitat (Draft EIR Section 2.3.1). The proposed project meets these objectives by providing for continued historic breaching of the barrier beach (Draft EIR Section 2.3.2) outside the lagoon management period, but modified breaching activities during the lagoon management period, in order to increase freshwater levels in the Estuary while minimizing flood hazard (Draft EIR Section 2.3.3). The Water Agency will also create and maintain a lagoon outlet channel in order to stabilize such higher water levels and minimize flood hazard (Draft EIR Section 2.4). The Russian River Biological Opinion concludes that reducing minimum instream flow requirements, as provided by the Fish Flow Project, will enable flows that will, among other benefits to salmon habitat in the watershed, provide a lower inflow to the Estuary between late spring and early fall, thereby enhancing the potential for maintaining a seasonal freshwater lagoon. However, the Russian River Biological Opinion does not condition lagoon management on achieving lower minimum instream flows during the lagoon management period. The Water Agency is required to implement the Estuary Management Project during the lagoon management period, regardless of the inflow into the Estuary at the time of barrier beach formation and closure of the river mouth. As discussed in detail in the Draft EIR and elsewhere in the responses to comments, because of unregulated tributary inflows, overall inflows into the Estuary are largely outside the control of the Water Agency, especially during the first part of the lagoon management period. Following natural closure of the estuary, the Estuary Management Project actions (reduced breaching, implementation of outlet channel, and maintenance of higher water levels) will take place without regard to the rate of inflow into the Estuary.

Several comments acknowledge the overlap in geographic extent of the projects required under the Russian River Biological Opinion, and this overlap is considered in the cumulative impact analysis in Draft EIR Chapter 5.0. Section 5.2.4 includes a brief description of the Fish Flow Project, types of impacts anticipated to result from the Fish Flow Project, the relationship to the Estuary Management Project, as proposed, and the potential contribution to cumulatively significant impacts. The analysis determined that the Estuary Management Project together with the proposed Fish Flow Project could have a cumulatively considerable contribution to water quality and recreational impacts.

The rationale behind the "piecemealing" prohibition is that the requirements of CEQA cannot be avoided by chopping up proposed projects into bite-size pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.[7] The danger the prohibition seeks to avoid is the subdivision of a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole. This rationale is not implicated in the present situation. The Water Agency has

[7] The concept of project *piecemealing* or segmentation derives from the CEQA Guidelines definition of a "project," Section 15165, and case law. The CEQA Guidelines define "project" as "the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately…" (Section 15378[a]). CEQA prohibits concealing the environmental consequences of a project by separately focusing on isolated parts and overlooking the cumulative effect of the whole action.

carried out a careful, detailed, and exhaustive evaluation of the potential environmental impacts of the Estuary Management Project, and has issued a Notice of Preparation for an EIR which will do the same for the Fish Flow Project. All of the environmental impacts of these two separate projects will be fully analyzed and brought to light, including any cumulative impacts of the two projects. The Water Agency is preparing two EIRs because the two projects are separate with respect to their purposes, their objectives, their physical locations, their timing, the actions that will be undertaken to carry them out, and their environmental impacts.

2.2 Project Description, Impact Areas and Scope of Analysis

Introduction

This section addresses comments about the project description, including implementation methods, and impact analysis within two geographic areas discussed in the EIR: the Estuary Study Area and the Maximum Backwater Area.

Overview of Issues Raised by Commenters

- Draft EIR focuses on impacts in Jenner and Duncans Mills, but impacts will extend upstream.
- Analysis should extend farther upstream to Vacation Beach, Monte Rio, Forestville, and Dry Creek.

Discussion

Although the focus of Water Agency Estuary management activities is the barrier beach at the mouth of the Russian River,[8] the Draft EIR analyzes environmental impacts over a greater area, from the mouth of the Russian River upstream to and including the Vacation Beach area. The Water Agency has no information that this project would have impacts upstream of Vacation Beach, and no such information was provided by comments received on the Draft EIR.

The Water Agency has detailed information about conditions in the Estuary up to the Duncans Mills area, beyond the confluence with Austin Creek. The Draft EIR identifies this area as the Estuary Study Area. The Water Agency has more general information about conditions from Duncan Mills upstream to Vacation Beach. The Draft EIR identifies this area as the Maximum Backwater Area. Although both areas are evaluated in the Draft EIR, the level of detail reflects the level of information available to the Agency for each particular area.

[8] As presented in Draft EIR Chapter 2.0, Project Description.

The Estuary[9] extends from the mouth of the Russian River upstream approximately seven miles to the Duncans Mills area at the confluence of the river with Austin Creek. Within this Estuary Study Area, the Water Agency has developed high resolution water quality, vegetation, biological resource, and bathymetric information. The bathymetric data used in the analysis (EDS, 2009) is the best available information. The Estuary Study Area itself has three primary reaches: lower, middle and upper reach (see Draft EIR Figure 2-3) and the Draft EIR discusses environmental impacts for each reach based on the detailed information available.[10]

From this detailed information, the Water Agency determined that, under certain closed conditions, increases in water elevations that result from implementation of the proposed project may extend beyond Duncans Mills upstream as far as Vacation Beach. The impacts within this Maximum Backwater Area are also evaluated, using the less detailed information that is available. However, because the upper reach of the Estuary Study Area is primarily freshwater, as is the Maximum Backwater Area, the Water Agency was able to use the detailed information available for the upper reach of the Estuary Study Area to evaluate impacts within the Maximum Backwater Area. The Water Agency has no evidence that backwatering conditions extend further upstream nor was evidence presented by commenters.

In addition to the detailed analysis presented for impacts from the mouth of the river to Duncans Mills, the Draft EIR analyzed and disclosed environmental impacts between Austin Creek (in proximity to Duncan Mills) upstream to Vacation Beach for geology and soils (Draft EIR Section 4.1), water levels (Draft EIR Section 4.2.), Water Quality (Draft EIR Section 4.3) Biological Resources (Draft EIR Section 4.4), Fisheries (Draft EIR Section 4.5), Land Use and Agricultural Resources (Draft EIR Section 4.6), Recreational Areas (Draft EIR Section 4.7), Cultural Resources (Draft EIR Section 4.8), Noise (Draft EIR Section 4.9), Air Quality (Draft EIR Section 4.10), Traffic (Draft EIR Section 4.11), and Hazardous Materials (Draft EIR Section 4.12), Public Services, Utilities and Public Safety (Draft EIR Section 4.13) and Aesthetic Resources (Draft EIR Section 4.14).

In summary, the impact analysis for Estuary Study Area and the Maximum Backwater Area reflects the level of information available to the Agency for each particular area. The fact that there are different levels of available detailed information for the Estuary Study Area and Maximum Backwater Area does not mean that the disclosure within each area is inadequate. Although it is correct that the Water Agency did not evaluate impacts above Vacation Beach, there is no information that impacts would result from the proposed project.

9 As defined on page 2-2 of the Draft EIR, estuary is defined as a partly enclosed coastal body of water with a river flowing into it, and open connection to the ocean (tidally influenced). The term “Estuary,” in the context of the Draft and Final EIR, refers to the geographic location of the project, recognizing that the proposed project involves creation of a “lagoon,” which is defined as a freshwater or brackish body of water separated from the ocean by a barrier beach.

10 This information collected by the Water Agency as part of its ongoing management is the best available information about “existing conditions” in the Estuary Study Area.

2.3 Project Feasibility

Introduction

This section addresses comments about project feasibility and the ability to achieve project objectives.

Overview of Issues Raised by Commenters

- Project design and adaptive management are experimental and unsubstantiated.
- Russian River watershed is different than referenced examples identified in the Russian River Biological Opinion and used to formulate project approach. Other watersheds referenced are not as large, do not have the same level of agricultural and urban land uses, or are not as impaired as Russian River Watershed.
- Project is experimental; should review other proven restoration examples in other West Coast locations.
- Lagoon outlet channel will not be successful because it is not possible to design a sand spillway that will withstand erosional force.
- Project does not have an established timeframe or success criteria.

Discussion

The National Marine Fisheries Service (NMFS) is the federal agency responsible for management of federally listed marine species, in this case endangered and threatened coho salmon, Chinook salmon, and steelhead, under the Endangered Species Act. In the Russian River Biological Opinion, NMFS assessed the condition of each of the three listed salmonid species relative to their extinction risk and described the function and role of their respective critical habitats for species conservation. The Estuary Management Project, both in terms of its design methodology and the use of adaptive management, has been developed to provide enhancement of habitat conditions for these species. A discussion of design methodology, adaptive management, success criteria, and use of this approach in other watersheds by NMFS is presented below.

Design Methodology

Design methodology for developing the lagoon outlet channel is based on understanding how a naturally-closing estuary forms a freshwater lagoon during summer time conditions at other California small to mid size coastal river mouths. The design was developed using a conceptual model of physical processes based on the following design criteria (PWA, 2010):

- Knowledge gained from prior artificial breaching
- Principles of adaptive management
- Observations of conditions during past periods of outlet channel closures
- Variables influencing implementation

- Channel alignment before closure
- Beach berm elevation
- Rate of lagoon water surface elevation increase
- Use of existing bedrocks as grade control
- Predicted outcomes/success/feasibility of the channel
- Target conditions – lagoon water level non-tidal, between 7 and 9 feet water level, some slow variation in response to river discharge, wave overwash, tides, evolving morphology of the outlet channel.

Because of the dynamic nature of channel morphology, it is difficult to predict the specific performance of the outlet channel. Therefore, the Estuary Management Project has been developed using adaptive management, which proposes design strategies, adjusts to the current conditions at the time of closure, and implements, monitors, and revises strategy and implementation methods as needed.

As described in the process flow chart in Draft EIR Figure 2-5, the proposed project assumes potential for channel closure after the outlet channel is initially established, and includes a maintenance component to re-establish the channel if necessary. The channel design is included in the Adaptive Management Plan (PWA, 2011). Based on engineering calculations, the channel bed slope must be essentially flat (slope on the order of 0.0001) with water depths of less than 2 ft, preferably 0.5 to 1 ft, to reduce the likelihood of channel scour. Tidal fluctuations in water level and variability in wave intensity will cause the locations of scour and deposition to shift at hourly timescales, but averaging across several tidal cycles, any sand lost by scour will be balanced by an equivalent amount of deposition (PWA, 2011).

Adaptive Management

Recognizing the variable and dynamic nature of the Russian River system, influence from external human inputs, and the future uncertainty of natural conditions, the Estuary Management Project is intended to be implemented as an adaptive management project. Adaptive management is a decision process that promotes flexible decision-making within a given set of accepted criteria that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Adaptive management requires: 1) monitoring of biological productivity, water quality, and physical processes in the Estuary in response to the changes in management actions that control water surface elevations in the estuary-lagoon system; and 2) refinement of management actions to achieve desired water levels to support improved biological productivity, while simultaneously providing flood management for properties adjacent to the Estuary. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity. Adaptive management is not an experimental ‘trial and error’ process; rather, it provides a structured approach to resource management. It is an iterative process in which the actions and tasks implemented to meet the management objectives are continually revisited and revised based on monitoring results and analysis relative to performance. Although predicting the actual outcome of the actions may be uncertain, actions are implemented purposefully, in coordination with regulatory agencies, with a

specific intended outcome. By repeating the lagoon management cycles, collecting information, and generating increasing knowledge about the Estuary system, the Water Agency and NMFS are able to refine prescriptions to more closely meet the objectives of the Russian River Biological Opinion. For many important problems now facing the resource management community, adaptive management may reduce the uncertainties inherent to the management of natural resource systems, and allow for flexibility of response to changing conditions. For many conservation and management problems, utilizing management itself in an experimental context may be the only feasible way to gain the system understanding needed to improve management (USGS, 2009).

Timeframe and Success Criteria

The Russian River Biological Opinion identified specific targets for the Estuary Management Project (NMFS 2008, page 249) that were noted in Draft EIR Chapter 2.0, pages 2-12 and 2-14: "The Estuary water level management targets (NMFS, 2008) are as follows:

1. Daily maximum water surface elevation of 3.2 feet during 70% of the year.
2. Average daily water surface elevation of at least 7 feet from May 15 to October 15."

Other Estuary Examples

NMFS, as the federal agency with fisheries expertise, concluded that information from other estuaries was relevant. Based upon the range of the three salmonid species at issue and the benefits of estuarine rearing for the survival of steelhead, and possibly coho salmon, shown in some of these systems, analysis of other watersheds, including those in Santa Cruz, San Mateo, Marin, Sonoma and Humboldt counties, were discussed in the Russian River Biological Opinion. Although each watershed, including the Russian River, is unique in terms of its physical and land use characteristics, the issues contributing to species decline within the broader recovery area for these species are generally thought to be consistent across these watersheds. The Estuary Management Project is based on the NMFS analysis in the Russian River Biological Opinion and is proposed to enhance juvenile salmonid rearing habitat within the Russian River Estuary. Other estuaries, including the Soquel Creek, Carmel, Pescadero, San Lorenzo, Navarro, and Gualala, among others, are actively managed areas in California with restoration programs targeting salmonid fishery recovery. Each of these estuaries provide rearing habitat for steelhead during the summer months, which is thought to be a key and consistent habitat requirement for species recovery.

2.4 Water Quality

Introduction

This section addresses comments about potential water quality impacts associated with implementing the Russian River Estuary Management Project.

Overview of Issues Raised By Commenters

- Relationship of Basin Plan, water quality objectives, and TMDL 303(d) list to the proposed project.
- Characterization of observed low oxygen conditions in the Estuary (anoxic and hypoxic conditions) as existing or natural conditions.
- Water quality impacts related to dissolved oxygen, nutrients and bacteria, with potential secondary effects to public health and recreation (water contact sports).
- Water quality impacts associated with lower flows associated with the Fish Flow Project (See Master Response 2.1).
- Potential project effects on sedimentation within the Estuary.
- Relationship of water quality to secondary biological effects (fish health, algal blooms, Ludwigia).
- Potential project effects on ocean water quality.
- Monitoring data is insufficient; specifically, the availability, adequacy, and range of water quality data collected in 2009 and 2010 is not adequate. Additional monitoring should be implemented.
- Draft EIR should address a broad range of water quality topics.
- Draft EIR should address water quality effects on fish.

Discussion

Basin Plan, Water Quality Objectives, 303(d) List of Impaired Waterbodies, and TMDL Policy

As discussed in Draft EIR Section 4.3, Water Quality, potential project impacts are considered in relation to the Regional Water Quality Control Board's (NCRWQCB) North Coast Basin Plan (Basin Plan). The Basin Plan identifies beneficial uses for surface waters within the project area and establishes water quality objectives (WQOs) for freshwater and estuarine bodies to protect these beneficial uses. Together, the WQOs and beneficial uses are called "water quality standards". As discussed in the Draft EIR, the proposed project would not result in changes to water quality that would violate any such water quality standards applicable to the Estuary. The Draft EIR does, however, identify the potential for nutrient and pathogen conditions in the Estuary to be adversely affected.

Section 303(d) of the federal Clean Water Act requires that each state identify water bodies or segments of water bodies that are "impaired" (i.e., do not meet one or more of the water quality standards established in a basin plan). These waters are then identified on the "Section 303(d) List of Impaired Water Bodies." Once the water body or segment is listed, the state is required to establish Total Maximum Daily Load (TMDL) for the pollutant that is causing the conditions of impairment. A TMDL is the maximum amount of a pollutant that a water body can receive and

still meet water quality standards. The TMDL process provides a quantitative assessment of contributing sources of pollution and the pollutant load reductions or control actions needed to restore and protect the beneficial uses of an individual water body for a given pollutant. In other words, TMDLs focus on controlling discharges into impaired waters.

The Estuary Management Project would not create or control sources of discharges of pollution or pollutant loads into the Russian River system. Therefore, the proposed project would not affect existing or proposed TMDL processes. It should be noted that the 2010 303(d) List of Impaired Waterbodies includes three impairments for the Russian River: pathogen/indicator bacteria; temperature; and sedimentation/siltation. NCRWQCB staff are in the process of developing a pathogen TMDL to address indicator bacteria with an extensive monitoring program to be implemented in 2011. NCRWQCB staff are proposing to develop a region-wide temperature TMDL implementation policy. Sedimentation is addressed, in part, by the TMDL Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region (Resolution No. R1-2004-0087).

The Water Agency has no authority to compel any person or entity to take any action to improve or maintain water quality within any part of the Russian River, including the lower Russian River. Nor does the Water Agency have any authority over any land use activities that may be contributing to degradation of water quality. The Water Agency is, however, required by the Russian River Biological Opinion to continue to monitor water quality parameters in the Estuary, and will integrate results of monitoring into the adaptive management process. Results of monitoring have been, and will continue to be, made available to the NCRWQCB and the public.

Primary Impacts to Water Quality

Water quality conditions existing in the Estuary are characterized in Chapter 3.0, Project Background and Environmental Setting, and analyzed in Section 4.3, Water Quality. The EIR uses the best available information regarding existing conditions within the Estuary, and notes that there are existing exceedances of certain water quality standards identified in the Basin Plan. There are also water quality constituents that have not been specifically addressed in the Basin Plan for estuaries; draft guidelines and recommendations have been used as surrogates for comparison. In considering the Basin Plan's WQOs and their corresponding goal of protecting beneficial uses, Draft EIR Section 4.3, Water Quality, notes that many of the Basin Plan's WQO are established for freshwater conditions. As such, they are not necessarily applicable to the dynamic processes that are found within estuarine systems, particularly with respect to dissolved oxygen conditions associated with stratification.

It should be noted that RWQCB regulates discharges of pollutants or waste, and that the regulatory scheme is not intended to protect beneficial uses from naturally occurring water quality conditions. Rather, its intent is to ensure that anthropogenic sources and activities do not adversely affect beneficial uses. The Estuary Management Project does not generate any such anthropogenic sources that would affect water quality. The State Water Resources Control Board is currently investigating estuaries to determine what appropriate bacterial (and nutrient source) levels are. Until then, existing water quality guidance only relates to freshwater, not estuarine, systems.

Water quality issues, including short-term impacts during outlet channel creation (Impact 4.3.1), impacts to salinity, dissolved oxygen, and temperature during the lagoon management period (Impact 4.3.2), and effect of nutrient and bacteria levels during the lagoon management period (Impact 4.3.3), are disclosed in Draft EIR Section 4.3, Water Quality. The impacts are evaluated in accordance with criteria identified in the CEQA Guidelines Appendix G, which require analysis of violation of water quality standards, alteration of drainage such that increased siltation or sedimentation occurs, or creation of additional pollutant sources. Additionally, Draft EIR Chapter 5.0, Cumulative Analysis, includes a review of water quality impacts considering other cumulative projects, including the Fish Flow Project. The analysis concludes that the Estuary Management Project, considered in conjunction with foreseeable effects associated with other cumulative projects, could result in cumulatively considerable water quality impacts related to nutrients and bacteria. Therefore, the Draft EIR analyzed and disclosed the range of potential adverse water quality impacts associated with the Estuary Management Project relative to the significance criteria required under CEQA. Under CEQA Guidelines Section 15151, an evaluation of the environmental effects of a proposed project need not be exhaustive; the range of water quality issues examined in the Draft EIR was reasonable based on available data and range of potential impacts. A discussion of specific water quality constituents identified in the comments received is provided below.

Dissolved Oxygen

Several comments received on the Draft EIR state that water quality conditions in the Estuary resulting from the project will exceed Basin Plan WQOs for dissolved oxygen, and that such exceedances are indicative of impaired water quality conditions. Although dissolved oxygen may exceed Basin Plan WQOs within the deepest parts of the Estuary water column, this is not an impact of the project. Rather, this is an existing condition that has been well documented by the Water Agency and others since 1996. Dissolved oxygen is an indicator of water quality as it relates to biological productivity. Existing dissolved oxygen conditions reflect re-occurring annual processes in the Estuary, including the formation of anoxic and hypoxic zones in the deepest parts of the Estuary. The dynamic steady-state between oxygen supply and consumption determines the oxygen concentration. In water bodies where the rate of consumption equals the rate of supply, water becomes devoid of oxygen and thus anoxic.

Reduced dissolved oxygen levels are a function of stratification of the Estuary along temperature and salinity gradients. These areas become isolated zones, where biological processes and lack of turnover or mixing result in consumption of available oxygen by biological processes, resulting in low dissolved oxygen levels. Anoxic and hypoanoxic zones currently occur within the Estuary, and are commonly observed phenomena in estuaries in California. Therefore, the occurrence of these zones is a well-documented existing condition that results from physical processes. As noted in the Draft EIR and past Water Agency sampling efforts, overlying freshwater layers provide ample dissolved oxygen in those layers during open and closed conditions.

Nutrients and Bacteria

Potential significant and unavoidable impacts to water quality associated with nutrient and bacteria levels are acknowledged and analyzed in Draft EIR Section 4.3, Water Quality. As noted on Draft EIR pages 4.3-7 and 4.3-12, there are currently no specific limits on nutrient and bacteria levels for estuarine systems, only freshwater. As discussed in the Draft EIR (page 4.3-24), the precise response of the Estuary to the Estuary Management Project cannot be predicted with certainty. As discussed in Draft EIR Section 4.3, it is anticipated that nutrient and bacteria conditions would remain within the range of those experienced within the Estuary over the past 15 years, but that the duration of those conditions would likely increase as a result of the project. Therefore, based upon the best available information, this EIR concludes that the proposed project would have the potential to result in significant and unavoidable impacts to water quality related to bacterial and nutrient levels in the Estuary.

Localized water quality may be improved in some areas of the Estuary and diminished in others. Freshwater lagoon conditions and stratification observed within the Estuary, in combination with the proposed Estuary Management Project, could result in physical processes and water quality conditions that could have a temporary, adverse affect on aquatic ecology. These conditions include potential algal blooms associated with nutrient loading, or other dynamic physical processes that could affect water quality. The potential for dynamic physical processes to adversely affect water quality currently exists within the Estuary, and their occurrence is considered part of the existing ecological regime of the Estuary.

The Estuary Management Project is intended to improve habitat conditions for juvenile salmonids. Adverse water quality conditions have occurred as a result of currently-occurring physical processes of the Russian River Estuary under existing conditions, and may occur in the future both with, and without, implementation of the Estuary Management Project. It should be noted that the Estuary Management Project's Adaptive Management Plan includes provisions for breaching in the event that flooding conditions, water quality conditions, or biological resource conditions warrant, after consultation with NMFS and California Department of Fish and Game.

Sampling events in 2009 and 2010 indicate there is a large variation in indicator bacteria levels observed through the different sections of the Estuary. These variations were observed to occur under both open and closed mouth conditions and may be seasonal as well. As noted in Draft EIR Section 4.3, Water Quality, pages 4.3-7 and 4.3-12, there are currently no quantified limits on nutrient and bacteria levels for estuarine systems, only freshwater. The Draft EIR also includes a cumulative analysis to evaluate the potential cumulative water quality impacts of the Estuary Management Project with the Fish Flow Project and concludes that potential adverse impacts are cumulatively considerable. As analyzed in Draft EIR Chapter 5.0, Cumulative Analysis (page 5-12), reduced inflows into the Estuary resulting from the Fish Flow Project could adversely affect water quality conditions, particularly with respect to bacteria and nutrient levels within the Estuary during freshwater lagoon conditions. Reduced flows may reduce the assimilative dilution capacity of Russian River flows upstream of the Estuary, and assuming inputs within the watershed remain constant, could result in increased concentrations of nutrients and indicator bacteria. Diminished water quality would have the greatest potential to occur during dry

hydrologic years. As discussed in Section 4.3, Water Quality, areas upstream of the Estuary (upstream of Austin Creek) are identified by the NCRWQCB as impaired for bacteria. Water quality sampling by various entities, including the Water Agency, have not identified bacterial levels that warrant listing the Estuary as impaired, and the 303(d) listing for bacteria is limited to areas upstream of Austin Creek.

Secondary Effects related to Water Quality

As noted in Draft EIR Sections 4.4, Biological Resources, and 4.5, Fisheries, project implementation is not expected to result in water quality conditions that would produce adverse secondary biological effects. The following discussion responds to comments regarding potential secondary impacts to Estuary ecology associated with changes in water quality, including: fish health, algal (blue-green, phosphorescent) blooms and red tides, and *Ludwigia* distribution. While these comments did not specify potential impacts related to project implementation, this response provides general information regarding these topics and demonstrates that the Estuary Management Project would not result in such adverse environmental effects.

Fish Health

As described in Draft EIR Section 4.5, Fisheries, Impact 4.5.2, impacts from potential changes to water quality conditions on special status and other native fish species in the Estuary are considered less than significant. Water quality impacts related to the project are addressed in detail in Draft EIR Section 4.3, Water Quality. As noted by commenters, many species are affected by the dynamics of lagoon formation and breaching in the Estuary. Draft EIR Section 4.5.2 describes the varied aquatic species and habitat within the project area. Draft EIR Section 4.5, Fisheries, specifically outlines the benefits to salmonids of lagoon rearing, and Impacts 4.5-1 and 4.5-2 specifically address the likely effects of the proposed management action on salmonids.

Algal Blooms

The proposed project is not anticipated to result in increased production of blue-green algae. Blue green algae (Cyanobacteria) are microscopic organisms naturally present in lakes and streams. Blue-green algae can become very abundant in warm, shallow, undisturbed surface water that receives a lot of sunlight and contains high nutrient (phosphorus and nitrogen) levels. When these conditions occur, algae can form blooms that discolor the water or produce floating rafts or scums on the surface of the water. Conditions conducive to blue green algae growth, accumulation, and blooms (shallow, warm, nutrient-rich water) currently exist within the Russian River system and have been documented in areas such as Laguna de Santa Rosa.

The lagoon under the proposed Estuary Management Project would increase water levels during summer seasons when water temperatures could be warmer. However, the system would not be entirely closed, and water would continue to flow out to the Pacific Ocean through the sandbar. The primary change associated with the proposed project is the change in water level and change in duration of maintaining the water level. The Estuary Management Project would not result in new sources of nutrients. Areas exposed to sunlight and subsequently warmer water temperatures,

and that are currently affected by nutrient inputs, will still be exposed to sunlight, warmer temperatures, and nutrients. For this reason, no change is expected in production of blue-green algae.

"Fluorescent" algae referenced in the comments are assumed to mean "phosphorescent" algae, a marine dinoflagellate (*Pyrocystis lunula*) that exhibits bioluminescent qualities. If water containing a high concentration of these phosphorescent organisms is disturbed (i.e. near shore during wave action), the water (wave crest) glows with a luminous blue light. These organisms require light and temperatures between 50 and 70 degrees Fahrenheit to photosynthesize. The Estuary Management Project focuses on developing a freshwater lagoon and will not change the presence or distribution of phosphorescent algae.

"Red tide" is a naturally occurring, non-anthropogenic phenomenon caused by a dramatic increase in populations of naturally occurring microscopic plankton (specifically, the dinoflagellate subgroup). The proposed project would not affect ocean conditions or weather patterns that contribute to the occurrence of red tide. Organisms that cause theses blooms on the Pacific west coast from California to Alaska include *Alexandrium catenella.* "Blooms" of the poison-producing plankton are a coastal phenomena caused by environmental conditions, which promote explosive growth. Factors that are especially favorable include warm surface temperatures, high nutrient content, low salinity, and calm seas. Rain followed by sunny weather in the summer months is often associated with red tide blooms. Water in coastal areas can be colored red by the algae, thus the term "red tide." Although toxic blooms often turn the water reddish brown, many nontoxic species of reddish brown plankton cause the same discoloration. In California the majority of red tides are not caused by species that produce deadly toxins such as domoic acid and the paralytic shellfish poisoning toxins (Langlois and Tom, 2008). The California Department of Public Health (CDPH) has a volunteer-based program to monitor the California coast for the presence of toxin-producing phytoplankton. CDPH also routinely monitors shellfish for the presence of these dangerous toxins with the active participation of local county health departments, other agencies and universities, and volunteers. Project implementation would increase the duration of freshwater lagoon conditions in the Estuary; it would not affect ocean conditions or weather patterns that contribute to red algal bloom occurrence. No evidence to the contrary was provided by comments received on the Draft EIR.

Ludwigia

Invasive *Ludwigia*[11] is a rapidly growing, perennial, freshwater aquatic shrub. This plant poses many threats to ecosystems due to its rapid and extensive growth and the damaging effects it has on native species. The Draft EIR does not discuss *Ludwigia* because, as discussed below, several factors within the Estuary limit *Ludwigia* distribution, including tidal conditions and resulting salinity and riverine scour processes, which would not be altered by project implementation.

[11] Recent botanical evaluations have raised questions about the species designation of invasive *Ludwigia*, also called aquatic primrose, in the Russian River system. Although it was initially identified as *Ludwigia hexapetala*, botanists now believe the invader to be either the non-native *Ludwigia peploides* subspecies *montevidensis*, a hybrid, or a species new to California. *Ludwigia* is the subject of active scientific research, evaluating its ecology and the environmental triggers that promote explosive growth (Okada and Grewell, 2009; Grewell and Hoch, 2009).

Under certain conditions, invasive *Ludwigia* can grow over surrounding vegetation to produce a thick mat of woody perennial stems and decaying plant matter. This mat can inhibit the recovery and recruitment of other plants and eliminates open-water habitats that are important foraging grounds for birds and other wildlife. As *Ludwigia* tissue sloughs off and decomposes, microbial growth reduces dissolved oxygen in the water, impacting fish and invertebrate populations.

Ludwigia occurs in transition zones of shallow, slow moving waterways, and along margins of lakes and reservoirs. *Ludwigia* is adapted to submersed and low-oxygen (anaerobic) conditions. Along with the ability to tolerate low oxygen, it also prospers in nutrient-rich water. *Ludwigia* is found in several systems in California. Based on consideration of the habitat requirements and ranges of tolerance of the *Ludwigia* species, the Estuary Management project would not result in *Ludwigia* colonization in the Estuary. The conditions that exist in the Laguna de Santa Rosa system and in other locations where *Ludwigia* may be present along the Russian River are very different than those that exist in the tidal portions of Russian River channel and estuary. *Ludwigia* requires slow moving, shallow water, and has a low tolerance for both saline conditions and scouring. The Estuary is saline and not a freshwater system for much of the year when it is open to the ocean tides. During this time, the Estuary is a dynamic hydrologic and geomorphic environment, where water flows, elevations, and velocities continually change (from hour to hour, day to day, and dramatically across seasons) and where tidal and fluvial sediment is continually transported, scoured, and re-deposited. *Ludwigia* thrives in static hydrologic and geomorphic conditions that do not exist along the tidal reaches of the river. Both the Estuary Study Area and the maximum backwater area experience winter flows and scour that limit the plant's ability to establish in gravel bar areas. There are currently gravel bars that experience periodic inundation which could support *Ludwigia* growth; however, *Ludwigia* is not currently present within these areas. Project implementation would not alter winter flow or scour events experienced within the Estuary.

Studies show that *Ludwigia* has low tolerance for salinity, and thrives only in freshwater. While there are other examples in California of locations of *Ludwigia* growth in saline or brackish water, it is expected that if *Ludwigia* developed in the Estuary, growth would be "reset" or eliminated with re-establishment of tidal conditions outside of the lagoon management period.

Finally, research developed by Dr. Brenda Grewell, University of California Davis, Exotic and Invasive Weeds Ecologist and Researcher, University of California Davis Department of Plant Sciences,[12] demonstrates that, contrary to assertions by individual commenters, the presence of *Ludwigia* is not an indicator of poor water quality. There are several locations within the Russian River watershed, including the Alexander Valley, where *Ludwigia* is present in stream reaches with high water quality conditions. Therefore, the assertion that reduced water quality conditions associated with the Estuary Management Project would influence *Ludwigia* distribution is not supported by evidence.

[12] Pers. Comm Bozkurt and Grewell, 2011.

Water Quality Monitoring

As described in Draft EIR Chapter 3.0, Project Background and Environmental Setting, the Water Agency's Estuary water quality monitoring program, as required by the Russian River Biological Opinion, is in place and will continue to be updated as new data is developed. The Adaptive Management Plan (PWA, 2011) provides for breaching in the event significant adverse water quality conditions are observed, following consultation with NMFS and CDFG. Although not required by the Russian River Biological Opinion, the Water Agency has augmented the water quality sampling program to include areas upstream of the Estuary and specific constituents, including adding datasonde monitoring stations in Monte Rio and the Willow and Austin Creek tributaries in 2010. Monitoring conducted as required under the Russian River Biological Opinion and as part of the Temporary Urgency Change Order will continue to be made available to the RWQCB and general public. This data is developed in order to assess river health from an ecological standpoint. Potential water quality threats relating to public health and recreation are monitored by the Sonoma County Environmental Health Division, including at Goat Rock State Beach.

Availability of Water Quality Data

Commenters questioned the accuracy of the water quality monitoring done in 2009, and requested that water quality studies and data from 2010 be made available to the Regional Water Quality Control Board and the public. The comments received did not specify why the water quality data collected in 2009 was inadequate, nor specify which water quality data was of concern. The analysis contained in Draft EIR Section 4.3, Water Quality, is based on the best available information at the time of publication.

The Water Agency has reviewed additional 2010 data that has been published since the circulation of the Draft EIR and, as discussed below, none of the new data changes the analysis presented in the Draft EIR. A discussion of individual data sources used to prepare this EIR is provided below. Contrary to some comments, all data gathered by the Water Agency regarding water quality monitoring in the Estuary has been and is being made available to the NCRWQCB.

- Water Agency long-term water quality monitoring, under various sampling programs, 1996 to present.
- *2009 Extended Closure Data Report* for results of salinity, temperature and dissolved oxygen monitoring conducted by University of California Davis' Bodega Marine Laboratory during an extended Estuary closure event in 2009.
- U.S. Geological Survey (USGS) of baseline water quality data during summer flows in the Russian River. Monitoring sites in the Estuary (Jenner and Willow Creek Marsh) were sampled in summer 2004 for inorganic and organic constituents, nutrients, trace elements, organic carbon, and mercury (Anders et al., 2006).
- Estuary nutrients monitoring conducted by Water Agency June through October, 2010.

Long-term water quality information collected at Water Agency datasonde monitoring stations (salinity, temperature, dissolved oxygen) is discussed in Draft EIR Section 4.3, Water Quality, Impact 4.3.2.

As discussed in the Draft EIR Chapter 3.0, Project Background and Environmental Setting, the water quality analysis also references the data report published by Bodega Marine Laboratory (University of California, Davis; 2009), reviewing circulation, stratification, residence and salinity in the Estuary Study Area from July through October 2009. An extended closure period lasting 29 days from September 7 through October 5, 2009, allowed for a study of prolonged closure conditions in the Estuary at high spatial and time resolution, along with two later closures (October 14-17 and October 22-27). This information represents the best available information on water quality during an extended closure of the Russian River estuary. Comments received do not identify specific inadequacies in this data. This report is available on the Water Agency's webpage: http://www.scwa.ca.gov/russian-river-estuary/

The results of nutrient and bacteria sampling collected as part of the 2009 and 2010 Temporary Urgency Change Orders were also discussed in Draft EIR Section 4.3, Water Quality, under Impact 4.3.3. Nutrient and bacteria sampling results from 2009 were provided to the NCRWQCB and the public in beginning on June 16, 2009, and are available on the Water Agency's website (http://www.scwa.ca.gov/stateboard2009/). Updates and sampling activities continued through October 5, 2009, and all data is still available online. With respect to public comment regarding NCRWQCB comments regarding this data related to whether statistical analysis should be conducted; the NCRWQCB did not submit any additional comments regarding the data's accuracy or adequacy to the Water Agency. Results of nutrient and bacteria monitoring in 2010 were provided to the NCRWQCB and the public for mainstem Russian River supplemental water quality monitoring and the Estuary on January 14, 2011, and January 18, 2011, respectively. This data is available on the Water Agency's website (http://www.scwa.ca.gov/tucp/), and was published in *the Russian River Biological Opinion Status and Data Report Year 2009-2010* (SCWA, February 28, 2011).

Inclusion of 2010 Continuous Monitoring Data

USGS and the Water Agency mainstem supplemental water quality results were posted to the web on January 14, 2011 and the estuary results were posted on January 18, 2011. Water quality data (temperature, salinity, dissolved oxygen, pH) collected in 2010 by the Water Agency has been evaluated and a reference has been added to Draft EIR Section 3.5 that pertains to the discussion of Estuary water quality (see Final EIR **Chapter 4, Changes to the Draft EIR**). Data collected in 2010 were not available for incorporation into the Estuary EIR background discussion or the impact analysis at the time of release of the Draft EIR. However, since release of the Draft EIR, the 2010 data has undergone a quality assurance review and been analyzed by the Water Agency.

Data collected in 2010 was consistent with data collected in past years, and included water temperature, salinity, dissolved oxygen content, and pH. Conditions observed during the 2010 season were also consistent with conditions observed in past years and with the characterization

of estuarine function provided in Draft EIR Section 3.5, as well as being consistent with conditions occurring in similar estuarine habitats. Therefore, the data collected in 2010 and incorporated into the Final EIR by reference supports the Draft EIR discussion of water quality conditions and estuarine functions currently existing in the Russian River Estuary.

Correction to 2010 Indicator Bacteria Sample Results

Draft EIR Chapter 4.3, Water Quality included a discussion of indicator bacteria data, including data on *Escherichia coli* (*E. coli*), collected by the Water Agency in 2010. The laboratory performing the analysis of water quality samples incorrectly reported the results for fecal coliforn as *E. coli*. The laboratory has since reissued the results with the correct bacterial constituent identified and the text in the Draft EIR has been changed to reflect this correction (See Final EIR **Chapter 4, Changes to the Draft EIR**). This change is not substantive and does not affect the environmental analysis in the Draft EIR, or the conclusion that potential impacts related to nutrients and bacteria are significant and unavoidable.

E. coli is a species of fecal coliform that is often used as a surrogate for identifying potential bacterial contamination related to the presence of fecal coliforms. As identified in Draft EIR Section 4.3, Water Quality, page 4.3-8 and 4.3-22, sampling events in 2009 and 2010 indicated there is a large variation in indicator bacteria levels observed through the different sections of the Estuary. Variability in total coliform counts was observed at all sampling stations in 2009 and 2010; similar variability was observed in 2009 *E. coli* data and the 2010 fecal coliform data that was incorrectly reported as *E. coli* data.

2.5 Alternatives Analysis

Introduction

This section discusses comments about the selection process, range of alternatives, and evaluation of impacts examined in the Draft EIR.

Overview of Issues Raised by Commenters

- Study of the effects of jetty modification and alternative flood control measures as future potential actions should be included in the proposed project, rather than be considered as project alternatives.
- Draft EIR does not include a cost analysis to differentiate between alternatives.
- The basis for the project chosen is not substantiated. Draft EIR does not consider combining alternatives: for example the Alternative Flood Control and Habitat Restoration Alternatives, to meet project objectives.
- Other alternatives should be evaluated based on least amount of construction to achieve objectives.

- Under a Reduced Project Alternative, no buildings would be flooded at this level, making low flow unnecessary.
- Jetty removal would return river to more natural conditions.

Discussion

Several commenters expressed preference for specific alternatives or requested that additional alternatives be reviewed. Under CEQA Guidelines Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather, an EIR must describe a range of reasonable alternatives which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. Additionally, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The range of alternatives examined in the Draft EIR is consistent with the "rule of reason" established by CEQA, and is focused on those alternatives capable of meeting the project objectives. Further, the EIR identifies potential alternatives that were considered by the lead agency, but were rejected by the agency. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: 1) failure to meet most of the basic project objectives, 2) infeasibility based upon technical, economic, and/or institutional issues, or 3) inability to avoid significant environmental impacts.

CEQA Guidelines Section 15126.6(d) provides that impacts of an alternative need not be discussed in as great detail as significant effects of the proposed project. In discussing alternatives, an EIR must include sufficient information to compare the impacts of the alternatives to those of the project. According to the CEQA Guidelines, a matrix displaying the major characteristics and significant effects of each alternative may be used to summarize the comparison, such as is provided in the Draft EIR at page 6-21 for the alternatives evaluated. Specific discussions about alternatives selection, description of selected alternatives, and environmental feasibility and tradeoffs associated with the Reduced Project Alternative (8-foot maximum water level), the Habitat Restoration Alternative, and Jetty Modification Alternative, and Alternative Flood Control Measures are provided in Draft EIR Chapter 6.0, Alternatives Analysis. The alternatives analysis in the Draft EIR is consistent with the requirements of CEQA.

Several comments questioned whether the "No Project Alternative" would include continued Estuary management activities. Consistent with CEQA Guidelines Section 15126.6 (e)(1), the purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. CEQA also determines that the no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or continuation of the existing activities. The Draft EIR alternatives discussion compares the environmental effects of the Estuary continuing to be managed as tidally influenced and artificially breached during the lagoon management period against environmental effects which would occur if the Estuary Management Project is approved. Therefore, the No Project Alternative assumes that the proposed project, in this case, modification of Estuary management, as required by the Russian River Biological Opinion, would not be implemented. Under such a scenario, the Water Agency's

management of the Estuary, which has been ongoing since the 1990s, would not be modified and would continue. With respect to the request by a commenter for a "no breaching alternative", the Draft EIR did consider a "No Future Estuary Management" Alternative (described in Section 6.3 on page 6-3).

Several comments expressed preference for the Reduced Project Alternative, and identified it as the "preferred alternative". The Estuary Management Project proposes a target elevation of 7 feet with a 9 foot maximum; the Reduced Project Alternative includes an 8 foot maximum. Under the Reduced Project Alternative (8-foot maximum water level), structures would still be affected. As discussed in the Draft EIR (Chapter 6.0, Alternatives Analysis, Section 6.7), the Reduced Project Alternative is identified as the environmentally superior alternative compared to the proposed project. It is not the "preferred alternative," as asserted in several comments.

Several comments expressed preference for the Jetty Modification Alternative. As required under the Russian River Biological Opinion, the Water Agency is developing a study plan for analyzing the effects and role of the existing jetty at Goat Rock State Beach on barrier beach permeability, sand storage and transport, flood hazard, and water surface elevations in the Estuary. Results of this analysis will be used within the context of the Estuary Management Project to determine whether modifications to the jetty would enhance rearing habitat for juvenile salmonids.

2.6 Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility

Introduction

This section discusses comments regarding recreational impacts and related socioeconomic impacts, and lack or inadequacy of mitigation measures identified to reduce or mitigate significant impacts.

Overview of Issues Raised by Commenters

- Potential project effects to surfing at Russian River mouth and the need to analyze ocean wave conditions.
- Potential impacts on recreational uses at Goat Rock State Beach, Estuary, and lower Russian River.
- Significant impacts to low cost recreational opportunities are not consistent with the California Coastal Act.
- Socio-economic effects related to loss of recreational opportunity.
- Project does not propose appropriate mitigation to offset impacts.
- Draft EIR should include mitigation for private property used for recreation and restoration opportunities.
- Draft EIR should evaluate consistency with the California Coastal Act.

Discussion

Recreational Impacts

The Draft EIR analyzed project impacts to recreational facilities and opportunities based on significance criteria established in Appendix G of the CEQA Guidelines. Recreation is of particular importance in the Russian River Estuary and the surrounding area. The Draft EIR acknowledges this importance by analyzing the proposed Estuary Management Project against additional criteria relating to the potential removal or diminished use of recreational opportunities (Draft EIR Section 4.7, Recreation, pages 4.7-6 and 4.7-7). As discussed in Draft EIR Section 4.7 and below, the proposed project is expected to have a significant adverse on recreation because it would change the frequency of open tidal conditions during lagoon management period, thereby reducing potential surfing conditions.

Several comments requested additional discussion of wave conditions near the Russian River mouth and analysis of the outlet channel effects on access on the barrier beach. Additional characterization of wave conditions at the Russian River mouth is beyond the scope of analysis necessary to evaluate the environmental effects of the Estuary Management Project. As discussed in Draft EIR Section 4.7, Recreation, compared to historical estuary management practices, project implementation would result in the reduction in the frequency of open channel tidal conditions that contribute to wave conditions preferable for surfing. Although the specific set of variables that contribute to favorable wave conditions for surfing, and their frequency of occurrence are difficult to quantify, project implementation would reduce the occurrence of open channel tidal conditions. As such, project implementation would reduce the overall occurrence of surfable wave conditions at the Russian River mouth.

Several commenters expressed concern that creating an outlet channel would reduce physical access to the north end of Goat Rock State Beach. When the mouth of the Estuary is open and tidal, access to the north end of Goat Rock State Beach is limited. Establishment of the outlet channel would be generally consistent with current barrier beach conditions, under which the Water Agency establishes a pilot channel to breach the sandbar within 7-14 days of barrier beach closure. Breaching the barrier beach reopens the mouth of the Estuary and returns the condition to limited access on the north side of the river. This change in the availability of access to the barrier beach north of the outlet channel would be incrementally decreased compared to existing conditions.

Recreational Impacts and California Coastal Act Consistency

Commenters questioned whether the proposed project is consistent with the California Coastal Act. A formal consistency analysis by the California Coastal Commission is required to determine whether the proposed Estuary Management Project is consistent with the coastal resources planning and management policies in Chapter 3 of the California Coastal Act of 1976 (CCA), Public Resources Code Division 20. This Coastal Commission consistency analysis also evaluates consistency with Local Coastal Programs. A more detailed consistency review of the Estuary Management Project under the applicable Sonoma Local Coastal Plan and the California Coastal Act would be required for approval of coastal development permits when the project proceeds to the

permitting phase. However, both California Coastal Commission and Sonoma County Permit and Resource Management Department have found the Water Agency's Estuary management activities, including the lagoon management identified in the Russian River Biological Opinion, to be consistent with the Local Coastal Plan in the past, and the Water Agency anticipates issuance of appropriate permits for implementation of the Estuary Management Project.

Mitigation Nexus and Feasibility

Several comments assert that the Draft EIR fails to identify relevant mitigation measures for the significant and unavoidable impacts to recreation (surfing and riverfront beaches), water quality (nutrients and bacteria) and biological resources (vegetation and pinnipeds) identified in the draft EIR. Consistent with CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measures must be roughly proportional to the impacts of a project and there must be an essential nexus (i.e., connection) between mitigation measures and the impacts caused by the project (CEQA Guidelines Section 15126.4(a)(4)(A)). Mitigation measures identified in comments on the Draft EIR would not be consistent with these guidelines.

Recreation

Feasible mitigation for the reduced frequency of favorable surf conditions or access to the barrier beach north of the outlet channel (when established) is not available, aside from implementation of the No Project Alternative. Suggested mitigation measures, such as artificial reefs to alter or improve surfing conditions, are infeasible given the engineering, construction, and financial challenges attendant to such a project, and would have the potential for their own substantial environmental effects. For mitigation measures to be feasible, they must be sufficient to reduce the impact to a level below the significance threshold. Comments on the Draft EIR, including comments from California State Parks, suggest mitigation measures to provide offsetting benefits to recreational access. Potential mitigation strategies identified by commenters include improving public access or providing additional public access to surfing areas in new locations, or building an artificial reef to enhance surfing conditions. The types of mitigation suggested by commenters and listed above are not commensurate with the temporary nature of the impacts, which only occur during a portion the 5-month lagoon management period.

Providing new points for public access to beaches or surfing locations would have potential environmental impacts which could ultimately be more severe than the temporary impact to recreation during the lagoon management period. For example, opening a new point of access could result in increased vehicle and foot traffic in a previously undisturbed, biologically sensitive area. Opportunities to improve and enhance public access at other locations to offset reduced frequency of open tidal conditions conducive to surfing would need to be coordinated with land owners or agencies with jurisdiction at the alternative locations. There may be public safety, traffic, sensitive biological resource, erosion and other environmental constraints or limitations associated with implementing new public access points.

Similarly, installation, maintenance, and long-term operation of an artificial reef to create new or improved surfing opportunities could result in additional environmental impacts. There is no

expert evidence to substantiate the viability, either recreationally or from a biological resource perspective, of an artificial reef. Construction of a physical structure would result in direct, adverse environmental effects to marine life, hydrology, and geomorphology during construction. Cases of successful artificial reefs are most prevalent outside of North America, in locations that are subject to severe weather (i.e. monsoons). Feasibility studies would need to be undertaken to determine if an artificial reef would be feasible or functional in the Russian River area.

Water Quality

With respect to mitigation for potential water quality impacts, the Draft EIR explains that given the uncertainty of impacts, it is not reasonable, nor environmentally beneficial, to provide mitigation for an unknown or uncertain impact.

Continued monitoring will provide tangible and real-time information about water quality as the Estuary Management Project is implemented. Irregularities or adverse trends will be tracked, noted, and addressed to the extent feasible through the adaptive management process, which provides a mechanism for correction and management of deviation from the desired future condition. The Water Agency does not have jurisdiction, enforcement authority, or scientific justification for setting thresholds for water quality standards. The Estuary Management Project, consistent with the Russian River Biological Opinion, has included contingency actions for overriding breaching conditions. No additional mitigation measures are feasible or required. As discussed in Draft EIR Chapter 2, Project Description, page 2-22:

> "Certain conditions during the lagoon management period, such as water quality degradation or imminent flooding to properties and structures adjacent to the Estuary, could require a change in management, and may result in the Water Agency breaching the barrier beach during the lagoon management period. If Estuary water surface elevations rise above 7 feet (at the Jenner gage) and flooding appears imminent (approaching 9 feet; giving consideration to river inflow, rate of Estuary water surface elevation rise, and ocean conditions), the Water Agency may artificially breach the barrier beach during the lagoon management period to alleviate potential flooding, as discussed in the NMFS' Russian River Biological Opinion. The Water Agency would consult with NMFS, CDFG, and State Parks regarding the potential for flooding as described in the Lagoon Outlet Channel Adaptive Management Plan (PWA, 2010). The Russian River Biological Opinion incidental take statement estimates that the Water Agency may need to artificially breach the barrier beach "twice per year between May 15 and October 15 during the first three years covered by this opinion, and once per year between May 15 and October 15 during years four to 15 covered by this opinion" (NMFS, 2008). Water Quality parameters are defined in the North Coast Regional Water Quality Control Board's Basin Plan and would be further defined in consultation with NMFS and RWQCB." [Footnotes omitted]

Biological Resources

The Water Agency currently implements pinniped monitoring as part of its Estuary Management activities, and is required to continue pinniped monitoring throughout the duration of its management activities. No additional mitigation measures were identified by commenters or are required.

Economic Impacts

According to the Section 15358(b) of the CEQA Guidelines, impacts to be analyzed in an EIR must be "related to physical changes" in the environment. The CEQA Guidelines do not directly require an analysis of a project's social or economic effects because such impacts are not, in and of themselves, considered significant effects on the environment. CEQA Guidelines §15131(a) states:

> "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

Under CEQA, economic impacts to businesses and land owners are generally only considered if the economic impacts themselves are so severe that they result in adverse physical changes. The Water Agency has no evidence of, and commenters presented no evidence of, adverse physical changes arising from economic impacts as a result the Estuary Management Project. Therefore, no additional analysis of economic impacts related to implementation of the Estuary Management Project is required.

2.7 CEQA Statutes: Adequacy of EIR Analysis

Introduction

This section discusses comments on the Draft EIR's specificity and how the Draft EIR addresses uncertainty.

Overview of Issues Raised by Commenters

- Draft EIR is inadequate because it assumes artificial breaching is the baseline condition.
- Conclusions are not based on substantial evidence.
- Analyses are speculative.
- Projections of project performance assume existing conditions will remain; does not consider foreseeable future conditions, i.e. climate change.

Discussion

The Draft EIR has been prepared with sufficient analysis to provide decision-makers with information to enable them to make a decision on project approval that intelligently takes into account environmental consequences. CEQA Guidelines Section 15151 says that "[a]n evaluation of the environmental effects of a proposed project need not be exhaustive, but [rather] the

sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Data gathering need not be "exhaustive."

Baseline Condition

Some commenters argued that the Draft EIR is inadequate because it considers the Water Agency's artificial breaching of the barrier beach as the baseline condition. In accordance with CEQA Guidelines Section 15125, for the purposes of this analysis, the environmental setting described in Chapter 3.0, Project Background and Environmental Setting, constitutes the physical baseline conditions within the Estuary Study Area and Maximum Backwater Area by which the Water Agency determines whether an impact is significant. The analysis reviews project impacts relative to "change from existing conditions." At present and since the 1990s, the Water Agency breaches the sandbar by creating a channel when necessary to minimize potential for flooding. The project proposes a change in the Water Agency's management practices. The Draft EIR evaluates the impacts of this change in practice. CEQA requires a description of the physical environmental conditions as they exist at the time the notice of preparation is published. The physical environment at the time of the notice of preparation included existing, ongoing Agency estuary management practices.

Substantial Evidence

Some commenters stated that the conclusions in the Draft EIR were not supported by substantial evidence. CEQA Guidelines Section 15384(a) defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Speculation and Future Conditions

Estuaries are complex, dynamic ecosystems, and experience changed conditions daily, between seasons, between years, and between different places in the same estuary. These conditions make estuaries extremely difficult to study. Moreover, the evaluation of the significance of the effects of changes due to Estuary management must be judged against the baseline required by CEQA (i.e. current conditions and ongoing management). Under the current Estuary management practices, water depth and salinity, as well as other water quality parameters, continuously fluctuate across a wide range of values.

As stated in CEQA Guidelines Section 15151, *"[a]n"an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts.*

The courts have looked not for perfection, but for adequacy, completeness and a good faith effort at full disclosure." For the proposed Estuary Management Project, this Guideline is particularly relevant for two reasons: 1) as discussed in Draft EIR Chapter 3, Project Background and Environmental Setting, the Estuary is a complex environment subject to changing environmental conditions on daily, seasonal, and yearly timeframes. Therefore, it may not be possible to precisely predict the effects of the proposed Estuary Management Project with precision; and 2) the Estuary Management Project proposes implementation of an Adaptive Management Plan that would, by definition, monitor and react to conditions that are observed in the Estuary during the course of its implementation. Application of the adaptive management process to the Russian River Estuary is prescribed in the Russian River Biological Opinion by NMFS, the agency with the legal responsibility and expertise on sensitive fisheries species management.

Within this context, the Water Agency recognizes that the precise response of the Estuary cannot be predicted with certainty. However, it is anticipated that conditions will remain within the range of those experienced within the Estuary during closed periods over the past 15 years, although the duration of those conditions may be extended, depending on the length of estuary closures. With respect to listed fish species, this increase in duration of freshwater lagoon conditions is a primary objective of the proposed project, and is anticipated to provide benefit to juvenile salmonids, particularly steelhead. This increase in duration may also result in secondary effects. Several technical issues will require additional monitoring, with subsequent alteration of the Adaptive Management Plan using the best information available.

Some commenters stated that the Draft EIR failed to consider the effects of future climate change on the project, including sea level rise. The Draft EIR describes Climate Change and Sea Level Rise in Draft EIR Section 4.2, Hydrology and Flooding (page 4.2-9) and in Chapter 5.0, Cumulative Analysis, under Impact 5.2.4.

2.8 Public Review Process

Introduction

This section discusses comments regarding the public review process.

Overview of Issues Raised by Commenters

- Biological Opinion did not include public participation of western Sonoma County.
- Members of public with knowledge of river conditions should be included in the EIR process.

Discussion

Prior to developing the Draft EIR, the Water Agency released the Notice of Preparation (NOP) and entered into the scoping process to solicit input from agencies and the public. The NOP was

prepared by the Water Agency in accordance with CEQA Guidelines Section 15082 to provide responsible and trustee agencies and the Office of Planning and Research with sufficient information describing the project and the potential environmental effects to enable agencies to make a meaningful response. As summarized in Draft EIR Chapter 1.0, Introduction, the NOP was circulated on Water Agency letterhead on May 7, 2010. The NOP identified the Water Agency as the CEQA Lead Agency, and established a 45-day public review period, which ended June 21, 2010. The purpose of the NOP public review period is to allow for review and comment by public agencies or interested members of the public on the scope of significant environmental issues to be analyzed, reasonable alternatives to be examined, and mitigation measures to be included in the Draft EIR. A response to a Notice of Preparation, at a minimum, should identify: the significant environmental issues and reasonable alternatives and mitigation measures that the responsible or trustee agency, or the Office of Planning and Research, will need to have explored in the Draft EIR. The NOP was mailed to the State Clearinghouse, and was posted to the Water Agency's website. Public legal notices and display advertisements were placed in five local newspapers informing the general public of the availability of the NOP and the times and locations of scheduled scoping meetings. The NOP was directly mailed to 431 parties,[13] and a postcard notification of the NOP's availability was sent to 1,231 parties.

Scoping has been found to be an effective way to bring together and resolve the concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons including those who might not be in accord with the action on environmental grounds (CEQA Guidelines Section 15083). The Water Agency held publically noticed scoping meetings on May 19 and 20, 2010, at the locations identified below.

Wednesday May 19, 2010
Open House Scoping Meeting: 7:30 p.m. – 9:00 p.m.
Jenner Community Center, 10398 Highway 1, Jenner CA 95450

Thursday May 20, 2010
6:30 p.m. – 8:30 p.m.
Sonoma County Permit and Resource Management Department Meeting Room
2550 Ventura Avenue
Santa Rosa, CA 95403

During an additional meeting on June 15, 2010, the Water Agency requested participation from regulatory agencies with jurisdiction over the project area or resources to solicit their comments and input on the scope of the EIR. Scoping has been helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating detailed study issues found not to be important. A primary purpose of the Scoping Report, included in Draft EIR Appendix 1.2, was to document the process of soliciting and identifying comments from interested agencies and the public. The Scoping Process provides the means by which the Water Agency and the responsible agencies can determine those issues that interested participants consider to be the principal areas for study and analysis.

[13] Distribution List provided in **Appendix 1**.

The Draft EIR was released on December 15, 2010. Public review and input was solicited on the Draft EIR during the public review period and public hearing, on the Draft EIR, held on January 18, 2011. The Draft EIR public review period extended 60 days from release on December 15, 2010, through February 14, 2011. The public comment period generally lasts for 45 days; the Water Agency determined 60 days was appropriate for this project.

Although NMFS was not required to and did not carry out any public process prior to adopting the Russian River Biological Opinion, the Russian River Biological Opinion was the result of ten years of consultation which included multiple opportunities for public participation. The Section 7 consultation process under the Endangered Species Act formally includes only regulatory agencies; however additional outreach to collaborate with the public and local agencies has been conducted over the past fourteen years, beginning in 1997. A Public Policy Facilitating Committee (PPFC) was formed, comprised of representatives of NMFS, USACE, the Water Agency, Mendocino County, the California Resources Agency, and the North Coast Regional Water Quality Control Board. The purpose of the committee was to receive reports from the Water Agency and its Endangered Species Act consultant, as well as public comment, on the analysis of the impact of the Water Agency's activities on the listed species and proposals to mitigate those impacts. This committee met in public over 19 times from 1998 to 2006. Since the Russian River Biological Opinion was issued in 2008, there have been 3 more PFFC meetings to introduce the Russian River Biological Opinion to the PPFC and the public, and to provide updates regarding progress made in implementing the Russian River Biological Opinion requirements.

2.9 Draft EIR Recirculation

Introduction

This section discusses comments regarding Draft EIR Recirculation.

Overview of Issues Raised by Commenters

- Draft EIR analysis is inadequate and should be updated and recirculated.
- Draft EIR should be analyzed with the Fish Flow project and recirculated (See Master Response 2.1).
- 2010 water quality data should be included as new information and recirculated (See Master Response 2.4).

Discussion

Under CEQA Guidelines Section 15088.5, recirculation of a Draft EIR is required when significant new information is added to the Draft EIR following the public review period, but before certification. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid

such an effect that the project proponents have declined to implement. “Significant new information” requiring recirculation would include the following:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from those previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

None of the above criteria established by CEQA Guidelines Section 15088.5 are applicable to the Draft EIR and therefore, recirculation of the EIR is not warranted. The Master Responses 2.1 through 2.8 provided above in this section provide clarification regarding a number of technical items, and do not change the analysis or conclusions provided in the Draft EIR.

2.10 References

Behrens, Dane and John Largier, Bodega Marine Laboratory, University of California Davis, *Preliminary Study of Russian River Estuary: Circulation and Water Quality Monitoring 2009 Data Report*, February 15, 2010.

California Coastal Commission, California Coastal Act, Public Resources Code Division 20, Chapter 3, Section 30200, Coastal Resources Planning and Management Policies,1976, revised 2010.

Environmental Data Solutions (EDS), Lower Russian River Bathymetric Analysis, Draft, October 2009, Methods Procedures, and Results, November 2009.

Grewell, B.J., Hoch, P. Biologically Based Integrated Management of Invasive Aquatic and Riparian Weeds, August 31, 2009.

Langois, G. (California Department of Public Health) and P. Tom (University of California, Food Science and Technology Department), Red Tides: Questions and Answers, Ref. No. UCSGEP 08-0W, September 30, 2008.

National Marine Fisheries Service (NMFS), Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River Watershed, September 24, 2008.

North Coast Regional Water Quality Control Board (NCRWQCB), Resolution R1-2004-0087, Total Maximum Daily Load Implementation Policy Statement for Sediment Impaired Receiving Waters in the North Coast Region, November 29, 2004.

Okada, M., Grewell, B.J., Jasieniuk, M. 2009. Clonal spread of invasive Ludwigia hexapetala and L. grandiflora in freshwater wetlands of California. Aquatic Botany. 91(3):123-256.

Personal Communication, Setenay Bozkurt, ESA-PWA, with Dr. Brenda Grewell, Exotic and Invasive Weeds Ecologist and Researcher, University of California Davis Department of Plant Sciences, April 28, 2011.

Personal Communication,Katie Blank, ESA, with Tom Luster, California Coastal Commission,1045 June 22, 2009.

Philip Williams and Associates (PWA), *Final Russian River Estuary Outlet Channel Adaptive Management Plan 2010*, prepared for Sonoma County Water Agency, June 23, 2010.

Sonoma County Environmental Health Division, Ocean Water Quality Monitoring, available online: http://www.sonoma-county.org/health/eh/ocean_testing.htm, updated June 3, 2011.

Sonoma County Water Agency (SCWA), *Russian River Biological Opinion Status and Data Report Year 2009-2010*, February 28, 2011.

State Water Resources Control Board (SWRCB), 2010 CWA Section 303(d) List of Water Quality Limited Segments for the Russian River Hydrologic Unit, originally published September 20, 2010; updated March 8, 2011.

CHAPTER 3
Responses to Comments

This chapter provides responses to individual comment letters received on the Draft EIR. Individual comment letters are provided followed by responses to those comments. As provided for under CEQA Section 21080.4, comments were accepted via email and are treated equivalent to written comments. Transcripts recorded during the Public Hearing (January 18, 2011) are also included as comments. Pursuant to CEQA Section 15132, responses are focuses on significant environmental points raised in the review and consultation process.

3.1 Responses to Federal, State, and Local Agencies Comments

This section includes copies of comment letters from federal, state, and local agencies and corresponding responses. Comment letters are arranged alphabetically by agency acronym or name.

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COPY

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southwest Region
777 Sonoma Ave., Room 325
Santa Rosa, CA 95404-4731

January 31, 2011

In response refer to:
2006/07316

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 2 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2 Russian River Estuary Management Project

Mr. Grant Davis
General Manager
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, California 95403

Dear Mr. Davis:

This letter transmits NOAA's National Marine Fisheries Service's (NMFS) comments regarding the Sonoma County Water Agency's (SCWA) draft Environmental Impact Report (DEIR) for the Russian River Estuary Management Project (Project). The Project entails modifying SCWA's flood control activities at the mouth of the Russian River to allow natural physical processes of barrier beach formation to seasonally create and maintain highly productive juvenile salmonid rearing habitat while minimizing flooding risk. Rearing habitat will be enhanced by reducing tidal influence within the Russian River estuary during a lagoon management period (May 15 – October 15) to increase freshwater habitat available to rearing juvenile salmonids. Adaptive management will require: 1) monitoring of biological productivity, water quality, and physical processes in the estuary in response to changes in the management practices that control water surface elevations in the estuary-lagoon system, and 2) refinement of management actions to achieve desired water levels that support biological productivity, while simultaneously providing flood management for properties adjacent to the estuary. The Project will occur entirely within the Russian River estuary, generally from the barrier beach at Goat Rock State Beach upstream to the town of Monte Rio, Sonoma County, California. NMFS has reviewed the DEIR, and offers the following comments.

General Comments

1) Within the DEIR, SCWA includes language that NMFS "mandates" SCWA and the U.S. Army Corps of Engineers (Corps) to implement the Project (e.g., page 2-1 of the DEIR). Characterizing the Project, or any portion of the Reasonable and Prudent Alternative (RPA), as a mandate from NMFS is misleading. As stated within the DEIR, the Russian River Biological Opinion was the culmination of more than a decade of consultation between SCWA, the Corps and NMFS regarding the impact of SCWA's and the Corps' water supply and flood control activities on federally-listed salmon and steelhead within the Russian River watershed. With respect to the Russian River Biological Opinion, a determination was reached that the proposed action was likely to adversely modify designated critical habitat for steelhead and coho salmon. In response to this determination, NMFS worked closely with SCWA and the Corps to develop a legally sufficient RPA that would allow both the Corps and SCWA to operate and fulfill their F_NMFS-1

various responsibilities with regard to water delivery and flood control. The fact that an adverse modification of critical habitat determination was reached did not mandate any particular action by the Corps, and the Corps and SCWA were free to propose any potential alternatives to the proposed action for evaluation during the collaborative RPA development process. Characterizing components of the RPA as being "mandated" by NMFS inaccurately describes the collaborative approach between the three agencies in developing the RPA, and it does not consider the flexibility afforded SCWA and the Corps to creatively craft potential RPAs for consideration during the process. Instead of framing the project, as is done on page 2-1, as something "mandated" by NMFS for purposes of simply improving freshwater habitat for listed salmonids, it would be clearer and more accurate to state that the project is a new, alternative means for managing and minimizing flood risk in the Russian River estuary in a manner that does not adversely modify extensive amounts of designated critical habitat for listed threatened and endangered species. In framing the project's context in this early section of the project description, it would also be useful to make very clear that the proposed project seeks more natural conditions at the mouth of the Russian River with the formation of a seasonal barrier beach and a freshwater lagoon affording greater depths and improved water quality for listed salmonid species. F_NMFS-1 cont.

2) The DEIR does not consider the potential for outlet channel construction and management following both barrier beach closure and breaching, but instead only considers outlet channel construction and management after the barrier beach has formed. The Russian River Biological Opinion states the following on page 250 [section 2.1.1, 1(e)] :

> *If the barrier beach has not closed and the estuary's water surface level is not being maintained at >3.2 feet NGVD by June 15 of each year when river inflows should have receded to about 150 cfs, SCWA shall consult with NMFS and CDFG to consider the feasibility of changing the outlet location from the center of the beach to a longer more northerly outlet as described in 1b), and* ***filling in the center outlet channel with sand from the beach.*** *The change in channel configuration would likely need to be carried out at slack tide and may not be feasible under all hydraulic conditions in the outlet channel. Based on the feasibility of closing the sandbar mouth during the summer months and managing the estuary as a closed or perched estuary, SCWA will implement these changes (emphasis added).*

F_NMFS-2

The above language was reviewed and found acceptable to SCWA prior to issuance of the biological opinion. During DEIR scoping meetings between SCWA and federal/state agencies in September and November, 2010, NMFS informed SCWA and their consultant of the importance of including this option within the DEIR analysis. We fully recognize that closing the beach may not be feasible in some years and that safety of equipment operators is a very high priority. Furthermore, achievement of inflows suggested in the biological opinion should make active closure of the estuary a truly infrequent event. Nevertheless, under low summer flows and benign ocean conditions, it may be feasible to

quickly create a stable closed lagoon system by filling the outlet channel with sand, with resulting significant benefits to salmonid populations and other freshwater resources.

This second general comment is not intended to cause a significant change in the project description that would unduly prolong the environmental review process. Permitting for barrier beach management activities must be in place for the upcoming low flow season. Rather, we are suggesting that it may be possible to make a minor modification of the proposed project so that an additional option is available to SCWA in its efforts to promote species recovery while managing estuarine water surface elevations. A project description might be crafted to include opportunity for both outlet channel construction as well as closure during benign low flow conditions without creating significant additional impacts. For example, a project description might retain the same number of days in which heavy equipment is allowed on the beach, and the operations might be designed so that the magnitude of the physical disturbance to the beach would be approximately the same whether SCWA machinery operators are opening up an outlet channel or filling in a shallow channel on the beach during late spring or early summer. F_NMFS-2 cont.

3) The DEIR mischaracterizes the potential impact of poor water quality on available salmonid rearing habitat that likely results from a perched lagoon scenario. Specifically, the DEIR does not analyze the cross-sectional distribution of water quality gradients (DO, temperature, and salinity), but instead relies solely on vertical water quality profiles generated longitudinally along the deepest part of the river channel. While this analysis accurately presents water quality conditions (and potential rearing habitat impacts) at the deepest holes along the estuary, it fails to characterize how the vertical water quality profile is affecting and benefiting estuarine habitat that extends laterally from the thalweg (*i.e.*, the deepest part of the channel running longitudinally down the river) to the estuary banks, especially newly inundated, shallow shore habitat. For instance, the DEIR finds that along the length of the estuary the vertical thalweg profile has a 2-3 meter surface band of cool, well oxygenated water overlying a deep anoxic layer. However, presenting the analysis in this manner fails to acknowledge the vast shallow areas of the estuary that would be covered by cool, low DO water that would likely provide complex, highly productive juvenile salmonid rearing habitat (See Figure 1). The areal extent of the channel bottom inundated by non-stratified and diurnally-stable depths of brackish/freshwater can be a metric of suitable, highly productive salmonid habitat. SCWA should update the DEIR with an analysis, utilizing data from the September 2009 closure and late spring/early summer 2010, that clearly identifies or at least acknowledges the estimated spatial extent, amount and quality of newly inundated, shallow-water habitat that would result from an extended estuary closure. Presenting only a limited description of conditions during the fall 2009 closure, which occurred under unusually low flows and under past practices of year-round breaching of the barrier beach, is hardly sufficient to describe the extent or duration of ecosystem changes of the proposed project, or the expected effect on water quality. F_NMFS-3

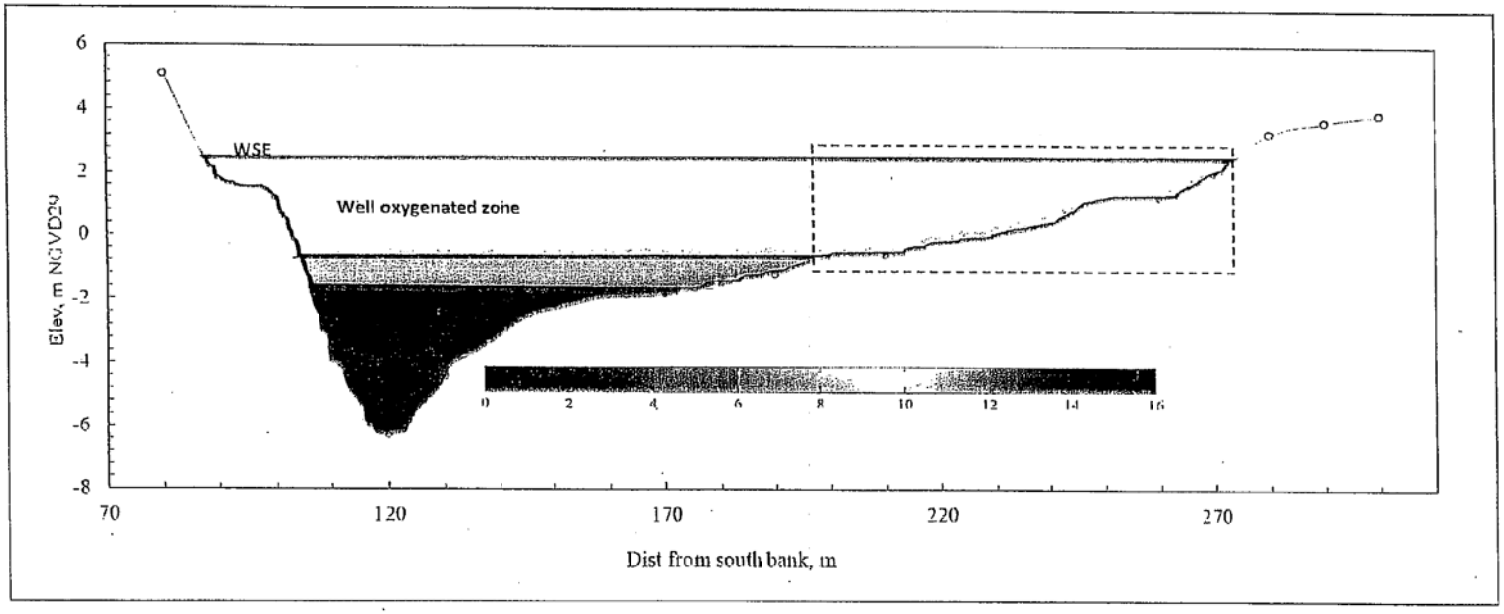

Figure 1: General representation of cross-sectional dissolved oxygen profile at Bridgehaven (Rkm 3.1) at 27 days following estuary inlet closure (September 2009). Area within dashed box illustrates section of shallow (<3m) nearshore habitat inundated by the upper layer of high quality, well oxygenated water. Graphic constructed from data provided within Largier and Behrens (2010).

F_NMFS-3
(cont.)

F_NMFS-4

Comment Letter F_NMFS

In addition, the analysis should not be restricted just to the defined Estuary Study Reach (*i.e.*, from the ocean upstream to approximately Austin Creek), but it should also address additional inundated areas extending upstream to Monte Rio. F_NMFS-3 cont.

4) The DEIR does not adequately quantify or describe the difference in potential available rearing habitat produced under the Reduced Project Alternative (8' maximum target water level) versus the proposed Project (9' maximum target water level). F_NMFS-4

5) NMFS respectfully submits that elements of the RPA undertaken by SCWA outside of the defined lagoon management period (*i.e.*, during the winter and early spring) can contribute to achieving Project objectives, and should be included in the Project description and discussed in the analysis of environmental impacts of the Project. For example, beach sand could be conserved along the shore if winter breaching activity is done at an angle towards the north end of the beach. F_NMFS-5

Specific Comments

1) Page 1-2 and 1-3: The DEIR makes the following statements:

> *According to NMFS, fresh or brackish water lagoons at the mouths of many streams in central and southern California often provide depths and water quality that are highly favorable to the survival of rearing salmon and steelhead.*
>
> and
>
> *Conditions in a fresh or brackish water lagoon are thought by NMFS to enhance the quality of rearing habitat for juvenile salmonids.*

NMFS would like to clarify that the expected benefits arising from a more natural, perched lagoon scenario, and the brackish/freshwater conditions that result, are not merely the conclusion of NMFS, but is also the conclusion of numerous peer-reviewed scientific literature on the subject (*e.g.*, Smith 1990, Bond *et al.* 2008), as well as three academic peer reviews of the estuary-related science in the Russian River biological opinion. Such DEIR language as above promotes public skepticism and misinformation of the science and goals of improved management and restoration of the Russian River ecosystem. F_NMFS-6

2) Page 2-25, first paragraph: The DEIR alludes to habitat restoration techniques under the Habitat Restoration Alternative, but does not specifically outline what those techniques might be. The vague description of habitat restoration ideas and locations that might be employed fails to describe or analyze how the alternative could meet Project and RPA objectives for the areal extent, duration and stable increased depths of freshwater inundation that occurs with the seasonal formation F_NMFS-7

of a river mouth lagoon. The limited area described as currently providing freshwater and brackish habitat in the tidal estuary (*e.g.*, at creek mouths) would still be subject to the twice daily diurnal surge and ebb of the tide, along with the diurnal swings in temperature matching the incoming river rather than temperatures mediated by a marine climate, pooling of cold groundwater and tributary inflows and the increased thermal mass of diurnally-stable deeper depths resulting from seasonal river mouth lagoon formation. Also, a reference would be appropriate following the statement…."This type of habitat restoration is common in other coastal lagoons". F_NMFS-7 cont.

3) Page 5-19, bottom paragraph: The DEIR erroneously states that Dry Creek is 15 miles long. Dry Creek is 14 miles in length, of which six of those miles will be enhanced as part of the RPA. F_NMFS-8

4) The DEIR misrepresents an element of the adaptive management strategy of the RPA as a Project Alternative. Jetty removal as a Project Alternative in and of itself has no potential to achieve Project objectives without implementing the full proposed Project's adaptive management strategy. F_NMFS-9

NMFS appreciates the opportunity to comment on SCWA's draft EIS for the Russian River Estuary Management Project. Please contact Mr. Rick Rogers at (707) 578-8552, or via e-mail at rick.rogers@noaa.gov, if you have any questions concerning this letter or require additional information.

Sincerely,

Dick Butler
North Central Coast Office Supervisor

cc. Eric Larson, CDFG
Michael Dillabaugh, Corps

National Marine Fisheries Services, National Oceanic and Atmospheric Administration, Dick Butler, January 31, 2011

F_NMFS-1 As noted in the text identified by the commenter, the Russian River Biological Opinion represents more than ten years of consultation between the The Sonoma County Water Agency (Water Agency), U.S. Army Corps of Engineers (USACE), and National Marine Fisheries Service (NMFS). However, the Russian River Biological Opinion does require the Water Agency to implement the Estuary Management Project to avoid jeopardizing designated critical habitat for steelhead and coho salmon, and as such, imposes a requirement on the Water Agency to alter its current estuary management practices.

F_NMFS-2 Closure of the mouth is not currently proposed by the Water Agency. As stated in Section 2.0, Project Description, the creation of the outlet channel would occur following natural formation of the barrier beach and closure of the estuary. In the event that the frequency of natural barrier beach closures during the Lagoon Management Period is not sufficient to meet the objectives and requirements of the Russian River Biological Opinion, the Water Agency may consult with NMFS and California Department of Fish and Game (CDFG), as part of the adaptive management of the estuary, to review the feasibility of filling the center outlet channel with sand and changing the outlet from the center of the beach to a more northerly location in an effort to establish lagoon conditions for the benefit of juvenile salmonid rearing habitat conditions in the estuary. As part of this consultation, NMFS, CDFG and the Water Agency would discuss the feasibility of such an approach and identify specific parameters or criteria under which closure of the mouth could be considered for implementation. In the event that mouth closure is determined to be necessary in order to meet the objectives of the Russian River Biological Opinion, the Water Agency and regulatory agencies would review potential impacts as required by California Environmental Quality Act (CEQA) Sections 15162 and 15163.

F_NMFS-3 Please refer to analysis provided in Draft Environemental Impact Report (EIR) Section 4.5, Fisheries, Impact 4.5.1, Habitat Availability. This analysis, which characterizes cross sectional distribution of water surfaces, estimates the available habitat provided by proposed project implementation. This analysis identifies a potential storage increase of 2,771 acre-feet at the 7 foot water surface elevation in areas extending upstream to Vacation Beach. The cross sectional characterization of water quality data, as requested by the commenter, is not available from the *Hydrography of the Russian River Estuary Summer-Fall 2009*. However, in discussing the volume of habitat provided by increased water levels, the potential for newly inundated areas to provide shallow water habitat is recognized. Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for a discussion of water quality impacts.

F_NMFS-4 Figure 4.5-1 in Draft EIR Section 4.5, Fisheries, and the comparison of project alternatives in Chapter 6.0, Alternatives Analysis quantifies the anticipated difference between the potential habitat provided by the proposed project and the Reduced Alternative on a volume basis. Under the proposed project, approximately 4,838 acre-feet of potential habitat would be provided. This volume is reduced to 3,590 acre-feet under the Reduced Project Alternative. This is the only available quantifiable information between these two alternatives. It is unlikely that there is a quantifiable, demonstrable difference in habitat quality between the area provided by a water surface elevation of 8 feet and the water surface elevation of 9 feet. The area of inundation between the thalweg and the water edge would be increased, but conditions along the edge would be similar at either elevation. Therefore, the characterization provided by the Draft EIR on a volume basis provides enough discernable information for decision makers to weigh the individual alternatives, and their ability to reduce impacts and meet the proposed project objectives.

F_NMFS-5 The Water Agency will continue to work with NMFS regarding implementation of the Russian River Biological Opinion. Artificial breaching outside the Lagoon Management Period includes the consideration of preservation of beach sands, as well as potential flood hazards, accessibility of the beach for the safety of personnel and visitors, and minimizing impacts to visitors and wildlife. Artificial breaching with a pilot channel oriented towards the north has been done previously and would continue with future breaching, with consideration of the factors above.

F_NMFS-6 The discussion specifically referenced by the commenter is a summary of conclusions reached by NMFS in the Russian River Biological Opinion. The additional scientific literature on the subject identified by the commenter is routinely cited throughout the Draft EIR, specifically in Chapter 3.0, Project Background and Environmental Setting, and Section 4.5, Fisheries.

F_NMFS-7 The Habitat Restoration Alternative was developed to review whether additional enhancements within the Estuary that focus on existing high value habitat areas would have the potential to provide habitat enhancement, thereby meeting some of the project objectives, while avoiding or minimizing impacts associated with the proposed project. As noted by the commenter, enhancement at the scale envisioned by the proposed project would not be provided by this alternative. However, enhancements focused on high value habitat areas represent a reasonable alternative for review. See **Master Response 2.5, Alternatives Analysis** in **Chapter 2, Master Responses**.

F_NMFS-8 Text regarding length of Dry Creek on page 5-19, of Draft EIR Chapter 5.0, Cumulative Analysis, has been revised as follows:

The Russian River Biological Opinion addresses this problem by mandating the creation of pools, backwaters and side channels on six miles of the 14-mile ~~15-mile~~ creek over a 12-year period.

F_NMFS-9 Alternatives related to the jetty modification were developed and discussed based upon comments received during the CEQA scoping meetings. The Water Agency will continue to consider development of a jetty study plan and implementation of such a study, as a potential future action, as described in the Russian River Biological Opinion. As noted on Draft EIR page 6-15, the Russian River Biological Opinion directs responsibility for removal or modification of the jetty, dependent upon results of the jetty study, to the USACE.

The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, it is required in the Russian River Biological Opinion that the Water Agency developed a jetty study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as for evaluating alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis.

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State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
7329 Silverado Trail
Napa, CA 94558
(707) 944-5500
www.dfg.ca.gov

EDMUND G. BROWN, Jr, Governor
JOHN McCAMMAN, Director

February 18, 2011

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

Subject: Russian River Estuary Management Project, Draft Environmental Impact Report, SCH # 2010052024, Sonoma County Water Agency

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (DEIR) for the Russian River Estuary Management Project (Project). The draft EIR was received in our office on December 23, 2010.

DFG is identified as a Trustee Agency pursuant to the California Environmental Quality Act (CEQA) Section 15386 and is responsible for the conservation, protection, and management of the State's biological resources. DFG is submitting comments on the draft EIR as a means to inform the Lead Agency of our concerns regarding sensitive resources which could potentially be affected by the Project.

The Project is being undertaken as a result of the National Marine Fisheries Service's (NMFS) 2008 *Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed* (Russian River Biological Opinion). The Russian River Biological Opinion is a culmination of more than a decade of consultation between the Sonoma County Water Agency (Water Agency), the U.S. Army Corps of Engineers (USACE), and NMFS regarding the impact of the Water Agency's and USACE's water supply and flood control activities on three fish species listed under the federal Endangered Species Act: Central California Coast steelhead, Central California Coast coho salmon, and California Coastal Chinook salmon. DFG issued a Consistency Determination on November 9, 2009, finding that the Russian River Biological Opinion was consistent with the California Endangered Species Act (CESA).

The Russian River Biological Opinion recommends that the Water Agency modify its Russian River Estuary (Estuary) management in order to reduce marine influence (high salinity and tidal flow) and allow formation of a fresh or brackish water lagoon in the Estuary from May 15 to October 15 (lagoon management period). Fresh or brackish water lagoon is expected to enhance the quality of rearing habitat for juvenile salmonids. In order to maintain the Estuary in a more natural condition, the Water Agency will adaptively manage

the Estuary with the primary objectives of enhancing rearing habitat for juvenile salmonids, particularly steelhead, and managing Estuary water levels to minimize flood hazard. Rearing habitat may be enhanced by reducing tidal influence on the Estuary during the lagoon management period to increase freshwater habitat available for rearing salmon and steelhead. Adaptive management requires: 1) monitoring of biological productivity, water quality, and physical processes in the Estuary in response to the changes in management actions that control water surface elevations in the estuary-lagoon system; and 2) refinement of management actions to achieve desired water levels to support biological productivity, while simultaneously providing flood management for properties adjacent to the Estuary.

Biological Resources

The draft EIR finds that implementation of the Project could change the extent, composition, and distribution of the vegetation communities within and adjacent to the Estuary. The draft EIR also notes that the adaptation of vegetative communities along the shoreline fringe of the Estuary is difficult to predict due to a number of factors. DFG agrees with the draft EIR's finding that implementation of the Project would result in conditions that resemble natural observed conditions in other estuary systems on the West Coast and that changes in vegetative assemblages would likely result in increases in sensitive Coast and Freshwater Marsh habitat. DFG recognizes these two habitats as sensitive natural communities and the expected increase in their area and abundance would likely benefit species utilizing the Estuary as habitat. S_CDFG-1

Fisheries

The Project will allow the Estuary to transition from a tidally influenced marine habitat to a productive freshwater estuarine lagoon habitat and maintain stratified conditions with increased freshwater habitat in the upper portion of the water column. Based on the literature currently available and referenced in the draft EIR (*e.g.*, Smith 1990, Bond *et al.* 2008), the Project is expected to result in greater estuarine habitat productivity, increased juvenile steelhead growth and increased adult recruitment. DFG concurs with the draft EIR's finding that the Project will have a beneficial impact on fish habitat availability in the Russian River; however, the draft EIR should include a more thorough analysis of the difference in potential available rearing habitat produced under the Reduced Project Alternative (eight-foot maximum target water level) versus the proposed Project (nine-foot maximum target water level). DFG also believes that the adaptive management element of the Project, including rigorous monitoring of water quality conditions, is an appropriate approach to mitigate any adverse impacts to habitat quality. S_CDFG-2 S_CDFG-3

Marine Protected Areas

Two Marine Protected Areas (MPAs) were placed into law on May 1, 2010 in the Project area. The two MPAs in the Project area include the Russian River State Marine Recreational Management Area (located in the estuary from the mouth to the Highway 1 bridge) and the Russian River State Marine Conservation Area (located offshore adjacent to the estuary mouth). The final EIR should address the compatibility of this Project with the overall regulations, goals, and guidelines of the Marine Life Protection Act (MLPA) and the S_CDFG-4

corresponding individual MPAs located in the Project area (Fish and Game Code §§ 2850-2863; CCR T14 §632). The final EIR should also recommend measures to avoid or fully mitigate any impacts that are inconsistent with the goals and guidelines of the MLPA or the corresponding individual MPAs located in the Project area. S_CDFG-4 cont.

Alternatives Analysis

In order to meet the objectives of the Russian River Biological Opinion, DFG recommends pursuing the project alternative that is able to best maintain the Estuary water surface elevation at seven to nine feet NGVD from May 15 to October 15. DFG believes that immediate implementation of an adaptive management plan for the Estuary outlet channel is an essential part of meeting the water level management targets found in the Russian River Biological Opinion. The adaptive management plan for the Project should include the ability to construct and manage the outlet channel prior to the barrier beach fully closing by modifying the existing outlet channel configuration, as recommended in the Russian River Biological Opinion on page 250 [section 2.1.1, 1(e)] : S_CDFG-5

> *If the barrier beach has not closed and the estuary's water surface level is not being maintained at >3.2 feet NGVD by June 15 of each year when river inflows should have receded to about 150cfs, SCWA shall consult with NMFS and CDFG to consider the feasibility of changing the outlet location from the center of the beach to a longer more northerly outlet as described in 1b), and filling in the center outlet channel with sand from the beach. The change in channel configuration would likely need to be carried out at clack tide and may not be feasible under all hydraulic conditions in the outlet channel. Based on the feasibility of closing the sandbar mouth during the summer months and managing the estuary as a closed or perched lagoon, SCWA will implement these changes.*

DFG also recommends that the Water Agency continue its study of the effects of jetty modification and alternative flood protection measures, as future potential actions to be included in the adaptive management aspect of the Project itself, rather then be considered as Project Alternatives, as they are currently recognized in the draft EIR. S_CDFG-6

Lake and Streambed Alteration Agreement

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, DFG may require a Lake and Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of an LSAA is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. S_CDFG-7

DFG appreciates the opportunity to comment on the Russian River Estuary Management Project. DFG staff is available to meet with you to further clarify our comments and provide technical assistance on any changes necessary to protect resources. If you have any questions, please contact Mr. Adam McKannay, Environmental Scientist, at (707) 944-5534; or Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568.

Sincerely,

Scott Wilson
Acting Regional Manager
Bay Delta Region

cc: State Clearinghouse

California Department of Fish and Game, Bay Delta Region, Scott Wilson, February 18, 2011

S_CDFG-1 No response or text modification required.

S_CDFG-2 Please refer to response to comment F_NMFS-4. No response or text modification required.

S_CDFG-3 No response or text modification required.

S_CDFG-4 Draft EIR Section 4.4, Biological Resources, and Section 4.7, Recreation, describe the goals and prohibitions of the Marine Life Protection Act (MLPA). As described in the Draft EIR (page 4.4-62), the Russian River mouth is located within the Russian River State Marine Conservation Area (SMCA), which extends along the coastline (FEIR-1). Additionally, the Russian River State Marine Recreational Management Area (SMRMA) extends from below the mean high tide line upstream to the Highway 1 Bridge (FEIR-2). As such, the Middle Reach and the Lower Reach of the Estuary Study Area are located within this SMRMA.

FEIR-1: Russian River State Marine Conservation Area Boundary

FEIR 2: Russian River State Marine Recreational Managed Area

The proposed Estuary Management Project will have a beneficial impact by increasing potential habitat availability for salmonids (Impact 4.5.1). Under the proposed project maximum water surface elevation of 9 feet, the project is estimated to provide an additional 170 acres of habitat and 3,088 acre feet of storage (see Draft EIR Table 4.5-3) in the Estuary Study Area. The project would likely either result in a full transition from tidally influenced marine habitat to productive freshwater estuarine lagoon habitat or maintain stratified conditions with increased stable freshwater habitat in the upper portion of the water column. Based on currently available research of lagoon productivity and benefits to juvenile salmonid rearing, the proposed project is expected to result in greater estuarine habitat productivity, increased juvenile steelhead growth and increased subsequent adult recruitment to the population (Bond et al., 2008; Smith, 1990; NMFS, 2008; McKeon, 1985 as cited in Entrix, 2004). Therefore, the proposed project is compatible with several of the MLPA goals including the following:

- Conservation of biological diversity and abundance of marine life;
- Conservation of health of marine ecosystems and populations; and
- Protection of representative marine life and therefore marine natural heritage

In addition, lagoon adaptive management components, including monitoring and responding to physical conditions as appropriate, are directly compatible with the MLPA intent of managing MPAs using ecosystem-based management principles and monitoring. The proposed project is also compatible with the MLPA in that it would assist in the effective management of the two Russian River MPAs.

Potential impacts to recreation, identified as significant and unavoidable, are potentially inconsistent with MLPA Goal 3 regarding recreational and

educational opportunities. However, the Estuary Management Project would be consistent with the remaining goals of the MLPA, including Goal 1 and Goal 2, which relate specifically to the recovery of listed and depleted species. Because the objective of the Estuary Management Project is focused on habitat enhancement for juvenile salmonids, recreational impacts would not fundamentally affect the compatibility of the proposed project with MLPA's objectives. As described in Draft EIR Impact 4.4.5 and 4.4.11, the Estuary Management Project would not conflict with local policies or ordinances protecting biological resources.

S_CDFG-5 Please refer to response to comment F_NMFS-2.

S_CDFG-6 Please refer to response to comment F_NMFS-9.

S_CDFG-7 The Water Agency will acquire CDFG permits as necessary for the Estuary Management Project. It is anticipated that CDFG would rely on the Draft EIR for issuance of permits under its jurisdiction.

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State of California • Natural Resources Agency
Edmund G. Brown Jr., Governor
DEPARTMENT OF PARKS AND RECREATION
Ruth Coleman, Director
Russian River District
PO Box 123
Duncans Mills, CA 95430

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY
FEB 24 2011
To: Jeane: Martini-Lamb
CF/45-5.1-2 Russian River Estuary Management Project

February 23, 2011

Mr. Grant Davis
General Manager
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, California 95403

Dear Mr. Davis:

The Department of Parks and Recreation (State Parks) provides for the health, inspiration and education of the people of California by preserving the state's most valued natural and cultural resources and by providing opportunities for high quality recreation. State Parks owns and operates a significant portion of the land surrounding the Russian River estuary including the following three key elements; the lowest lying structure within the estuary (Jenner Visitor Center), the Russian River jetty, and the beach upon which breaching and the proposed lagoon outlet channel would occur.

General Comments

The Sonoma County Water Agency's (SCWA) Russian River Estuary Management Project Draft Environmental Impact Report (RREMPDEIR) proposes to manage dry season flows (May 15 – October 15) within the Russian River estuary through the construction and maintenance of an overflow channel and resultant freshwater lagoon. The estuary has historically been breached due to the presence of low elevation structures subject to flooding.

SCWA's proposed project is the result of review by the National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act due to impacts to steelhead and coho salmon associated with the breaching of the estuary. NMFS Biological Opinion (BO) provides SCWA with an adaptive approach to managing the Russian River estuary and includes three measures; dry season perched lagoon (under consideration as the RREMPDEIR), modification/removal of the jetty, and relocation of structures subject to flooding. State Parks was not consulted in the BO process.

State Parks supports measures that improve the resources of the Russian River estuary. The RREMPDEIR focuses on a single measure to manage a perched lagoon as a means to improving the long term problem of salmonid decline within the Russian River Watershed. However, the feasibility of this effort remains to be proven as demonstrated in 2010. Concurrently, the species which the BO and RREMPDEIR seek to conserve, struggle for survival with low populations and poor conditions in the Russian River watershed. S_CDPR-1

State Parks primary concern is the inadequacy of the RREMPDEIR to focus on the suite of measures outlined in the BO instead of the single element as described. Further, State Parks remains unclear as to the criteria to measure this project's success or failure and what triggers a commitment to move forward with the other measures identified by the BO. S_CDPR-1 cont.

Coastal Access

Each time the Russian River is breached or the proposed lagoon channel is created or maintained, SCWA operations impact park visitor use through partial closure of Goat Rock Beach. The RREMPDEIR acknowledges that the proposed project will likely result in an increase in equipment use and subsequent beach closures and concludes that the impact is not significant, as the increase is not substantial. The underlying assumption of this argument is that the existing condition of mechanical breaching is the baseline. However, the existing condition of breaching and resultant beach closure has not been evaluated under the California Environmental Quality Act. S_CDPR-2

During the last 14 years SCWA has breached the estuary 87 times, an average of 6.2 times/year, with a low of zero breaches in 2006 and a high of 15 in 2009. May (11), September (12), October (19), November (20) and December (10) are the most frequent months when breaching occurs.

From July 1, 2009 through June 30, 2010, Sonoma Coast State Beach (no visitor use numbers exist for Goat Rock Beach) received almost 3 million day use visitors. Goat Rock Beach is the second most popular beach on the Sonoma Coast. It is reasonable to assume that a significant portion (10%) of park visitors visit this beach. The lagoon management period corresponds with the most impacted time of year for park visitors with approximately 66.5% of visits.

According to the RREMPDEIR two days of initial construction and up to 18 days of maintenance activity would result from implementation of the project. There are 153 days in the management period (May 15 – October 15). The proposed project has the potential to restrict public access to Goat Rock Beach for 13.1% of days within the management period during the most heavily used time of the year. Goat Rock Beach is also one of the easiest beaches to access. State Parks considers such limitations to coastal access as significant.

There are a variety of opportunities in Sonoma County for SCWA to mitigate coastal access impacts. Numerous vertical access nodes are in poor, deteriorating condition and are often damaged by winter weather events. This situation forces the public to use other easily accessible locations. The Coastal Commission also maintains an inventory of offers to dedicate public access. SCWA should consider such opportunities to mitigate impacts to coastal access. S_CDPR-3

Public Recreation

According to the RREMPDEIR, the proposed project would result in significant impacts to public recreation (surfing). No baseline quantification of the frequency and quality of waves at the Russian River exists so it is difficult to quantify potential impacts. However, estimates can be made by reviewing; weather records, breaching records, hydrograph records, seal data notes, and consultation from surfers who frequent the Russian River mouth. In the interim, SCWA should initiate monitoring of surf conditions to help in establishing baseline references. S_CDPR-4

SCWA acknowledges mitigation exists in the form of creation of new surf breaks and concludes that impacts are unavoidable and that mitigation in this case is not feasible. State Parks suggests that a mitigation strategy should be further explored. Based upon the significance of impacts SCWA could respond with an appropriate tiered mitigation strategy. For example, a low level of impact could be mitigated by providing improved or maintaining (in the face of budget cuts) existing coastal access. Moderate impacts could be mitigated by providing access to surf spots that are currently inaccessible but publicly owned or where nearby vertical access easements have not been dedicated. Construction of an artificial reef (the measure noted as unfeasible by the RREMPDEIR) should be considered only under high impacts such the total loss of surfing at the Russian River mouth. S_CDPR-5

State Parks is eager to cooperate with the restoration of the Russian River estuary. We stand at the ready to work toward the goal of improved estuary function and flood control. State Parks is of the opinion that the goal of flood control should focus on a long term, self maintaining method, not repeated mechanical intervention. The goal of estuary restoration should be more inclusive than steelhead and coho salmon. As such, the process by which the estuary is managed should include a larger array of stakeholders and should be crafted upon broadly reaching goals.. S_CDPR-6

State Parks appreciates the opportunity to comment on the RREMPDEIR. Should you have any questions regarding this letter, please contact Mr. Brendan O'Neil at (707) 865-3129, or boneil@parks.ca.gov.

Sincerely,

Liz Burko
Russian River District Superintendent

California Department of Parks and Recreation, Liz Burko, February 24, 2011

S_CDPR-1 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements** in **Chapter 2, Master Responses**.

S_CDPR-2 CEQA Section 15125 requires analysis of project change relative to existing conditions. Therefore, the Water Agency's current artificial breaching program represents the appropriate baseline for analysis. The increase in mechanical disturbance on the beach of the proposed project is anticipated to be incremental compared to existing conditions.

S_CDPR-3 The Lagoon Management Period of May 15 through October 15 corresponds with summer months, typically a high recreational use period. As demonstrated in Chapter 2.0, Project Description, Table 2-1 and Figure 2-4a and Figure 2-4b, the current artificial breaching program includes the potential for artificial breaching during this time period. Opportunities for barrier beach closure and outlet channel formation are anticipated to be consistent with the frequency of occurrence that has been exhibited under the Water Agency's current artificial breaching program. The assumed maintenance scenario (18 maintenance events) is considered worst case, and temporary restricted access to the coast or Goat Rock State Beach would be limited to the portion of the beach north of the created outlet channel north of the jetty. Temporary signs and rope barriers are implemented by local volunteers for protection of the Harbor seal haulout. The area of the beach closest to the visitor parking areas (From Goat Rock to the jetty) remains accessible to the public. Even with this worst-case assumption, the short-term nature of these activities and the maintenance of beach access during their implementation renders them less than significant and no mitigation is necessary (Draft EIR, Section 4.7, Recreation, Impact 4.7.1).

S_CDPR-4 Please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility, and Mitigation Measures** in **Chapter 2, Master Responses** for discussion on monitoring surf conditions.

S_CDPR-5 Please refer to **Master Response 2.6 Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility,** in **Chapter 2, Master Responses** for discussion on monitoring surf conditions.

S_CDPR-6 The Water Agency will continue to coordinate with the California Department of Parks and Recreation regarding implementation of the Estuary Management Plan.

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

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February 10, 2011

File Ref: SCH #2010052024

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403

Subject: Draft Environmental Impact Report (EIR) for the Russian River Estuary Management Project

Dear Ms. Martini-Lamb:

Staff of the California State Lands Commission (CSLC) has reviewed the subject Draft Environmental Impact Report (EIR) for the Russian River Estuary Management Project (Project), which is being prepared by the Sonoma County Water Agency (SCWA), the public agency carrying out the project, as the lead agency under the California Environmental Quality Act (CEQA) (Public Resources Code sections 21000 et seq.). The CSLC has prepared these comments as a Trustee and Responsible Agency because of its trust responsibility for projects that could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

CSLC Jurisdiction

The State acquired sovereign ownership of all tidelands and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for statewide Public Trust purposes, which include waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. The landward boundaries of the State's sovereign interests in areas that are subject to tidal action are generally based upon the ordinary high water marks of these waterways as they last naturally existed. In non-tidal navigable waterways, the State holds a fee ownership in the bed of the waterway between the two ordinary low water marks as they last naturally existed. The entire non-tidal navigable waterway between the ordinary high water marks is subject to the Public Trust Easement. Both the easement and fee-owned lands are under the jurisdiction of the CSLC. The locations of the ordinary high and low water marks are often related to the last natural conditions of the river, and may not be apparent from a present day site inspection. The Russian River is sovereign land and under the jurisdiction of the CSLC.

Local County agencies, and subsequently SCWA, have been artificially breaching the recurrent barrier beach, often several times a year, with heavy equipment since the 1960s to relieve flood risk to adjacent properties. Since October 1, 1996, SCWA, responsible for the breaching starting in the 1990s, has been under several rent-free general leases with the CSLC. These leases have authorized breaching activities on the approximately 11-acre parcel of sovereign land in the Russian River Estuary. SCWA's most recent lease with the CSLC, effective January 1, 2006, expired on December 31, 2010 and is currently in holdover status. The CSLC received an application from SCWA on December 1, 2010 for a new lease, which will reflect changes to the use of State land resulting from implementation of the Project. The CSLC is now waiting to continue processing the application, pending the production and certification of the subject EIR.

Proposed Project

The proposed Project involves seasonal estuary management that will reduce salinity and tidal inflow and maintain water depths from May to October. The EIR describes the Project as adaptive management of the Russian River Estuary consistent with the Russian River Biological Opinion, issued by the National Marine Fisheries Service (NMFS) in 2008. This adaptive management is required under the terms of the 2008 Biological Opinion. The Project's dual goals are fisheries habitat enhancement and flood risk minimization for nearby structures and lands. The seasonal, freshwater lagoon that the SCWA would create would provide suitable rearing habitat for three salmonid species listed under the Federal Endangered Species Act: Central California Coast steelhead, Central California Coast coho salmon, and California Coastal Chinook salmon, determined to be impacted by SCWA's water management practices, upstream dams and historic breaching practices at the mouth of the Russian River.

SCWA's management will be accomplished through:

- Maintenance of a freshwater lagoon at the mouth of the river between May 15 and October 15 as rearing habitat for juvenile salmonids: the lagoon's water level would be controlled through the creation of a sinuous outlet channel.
- Maintenance of an estuary water depth of at least seven feet during this summer management period.
- Artificial breaching throughout the rest of the year, as needed for flood control, of the intermittent barrier beach that forms at the mouth of the river.

The EIR identifies the Reduced Project Alternative, which would involve maintaining the freshwater lagoon at a maximum level of eight (instead of nine) feet of elevation, as the Environmentally Superior Alternative.

The CSLC supports projects, such as fishery habitat enhancement, on State lands that are consistent with the Public Trust; however, the agency is also responsible for ensuring that such projects avoid or minimize impacts to other Public Trust resources and uses including, but not limited to, cultural resources, recreation and public access. In the interest of all Public Trust values of the sovereign land at the Russian River, the CSLC offers the following comments on the Draft EIR.

Specific Comments

1. Sections 2.7.2 (p. 2-29), 4.4.3 (p. 4.4-64) and 4.6.2 (p. 4.6-6) need to be corrected regarding SCWA's lease with the CSLC. In section 2.7.2, the list of agency approvals SCWA has for current breaching practices, and in the descriptions of the CSLC in sections 4.4.3 (Regulatory Framework – Biological Resources) and 4.6.2 (Setting – Land Use and Agriculture), the EIR states that "the Sonoma County Water Agency possesses a land lease permit issued by the CSLC, in accordance with Article 2 of the Leasing and Permits Regulations, to conduct artificial breaching within CSLC jurisdiction (CSLC, 2007)." Please note that SCWA's most recent lease has expired as of December 31, 2010. S_CSLC-1

Biological Resources Comments

2. One of the provisions of Mitigation Measure 4.4.1a, which addresses short-term impacts to Special-Status Plant and Animal Species, is that, during construction, "if a special-status plant or larval host species for special-status butterflies or nesting birds are encountered, the location shall be documented and species-specific avoidance and minimization measures shall be prepared by the qualified biologist in coordination with the Agency and appropriate resource agencies" (p. 4.4-71).

   Although for CEQA purposes the mitigation measures identified in an EIR need not include all specific details, the EIR does need to at least "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way" (CEQA Guidelines §15126.4(b)). As currently written, the measure neither identifies specific actions to be taken when encountering special-status species during construction nor specific performance standards for actions to be developed later; this amounts to deferred mitigation. Deferral of the formulation of mitigation not only runs counter to the CEQA Guidelines (§15126.4(b)), but denies responsible agencies and the interested public the chance to comment on the adequacy of the proposed mitigation for avoiding or minimizing a project's impacts. Please either identify specific mitigation measures for the special-status species that may be present in the Project's area or define specific performance standards for mitigation. S_CSLC-2

3. Mitigation Measure 4.4.1b (p. 4.4-72) entails a worker environmental awareness training for construction personnel to minimize to less than significance the impacts of outlet channel construction and breaching activities on sensitive natural communities, waters and wetlands, and wildlife movement and nursery sites. The S_CSLC-3

CSLC recognizes the value of personnel training in encouraging environmentally-conscientious construction; however, the presence of a biological monitor with the authority to halt or adjust construction or site worker activities would further ensure that construction activities on the beach would pose no significant threat to these vegetative communities, water and wildlife. With a monitor onsite, there is less potential for unforeseen circumstances creating conflicts between construction activities and the area's biological resources. Please consider the addition of a biological monitor to Mitigation Measure 4.4.1b to oversee construction activities. S_CSLC-3 cont.

4. In the EIR's discussion of both Impact 4.4.3, "Waters and Wetlands" (p. 4.4-73), and Impact 4.4.4, "Wildlife Movement and Nursery Sites" (pp. 4.4-73 & 74), the document concludes that practices in the Project description and necessary permits, "*in addition to* implementation of Mitigation Measure 4.4.1b (worker environmental awareness training) above would reduce potentially significant impacts…to less than significant [emphasis added]." Both impacts, however, are listed in these sections and in the Executive Summary (p. ES-23) as "Less than Significant," rather than "Less than Significant with Mitigation." Because the evaluation of these impacts as less than significant assumes implementation of Mitigation Measure 4.4.1b, they should be listed in both the Executive Summary and in the body of the EIR as "Less than Significant with Mitigation." S_CSLC-4

5. In the analysis of Impact 4.4.6, regarding the project's potential effects on the Project area's sensitive natural communities, the document acknowledges that the eventual change in community composition "is difficult to predict, as it is subject to several factors" (p. 4.4-77). Although the expected levels and time periods of inundation may result in a net area increase of the Coastal and Valley Freshwater Marsh (CVFM) sensitive natural community, an adaptive management plan should still address recognized uncertainty in the Project's impacts.

   Because the Project's ultimate effects on CVFM will be "subject to several factors" that, other than estuary water level, remain unidentified in the EIR, there remains a reasonable possibility that, without mitigation, the project could result in a loss of CVFM. Approximately 48% of the Project area's CVFM exists between the seven- and nine-foot elevation marks, areas that historically have generally been inundated for no more 14 days at a time. Under the proposed Project, whose aim is, at minimum, a seven-foot daily average water depth in the lagoon, much of this natural community could be submerged for anywhere from one to five months. Although the increased water level may shift CVFM establishment to higher elevations, the EIR should include a more rigorous discussion of the factors that suggest this upland shift will occur, rather than a net reduction in area of CVFM. If, after such discussion, the EIR concludes that the effects of the Project on CVFM remain reasonably uncertain, a multi-year vegetative monitoring component, along with a contingent mitigation measure, could identify and mitigate to less than significant any unanticipated net decline in CVFM. S_CSLC-5

6. The CSLC staff requests, for the sake of consistency, the correction of several numerical typos. In Section 4.4.4, Environmental Impacts and Mitigation Measures - Biological Resources, the first paragraph of Impact 4.4.9 should reference "Impact 4.4.6", not "Impact 4.4.7". Also, all references to "Mitigation Measure 4.4.6" should be changed to "Mitigation Measure 4.4.8" S_CSLC-6

Recreation Comments

7. In its analysis of impacts to recreation, the EIR concluded that Impact 4.7.1, "Disruption of Use of Recreational Facilities" (p. 4.7-8), and Impact 4.7.2, "Eliminate or Modify an Existing Recreational Resource" (p. 4.7-10), are "Significant and Unavoidable." As public access and recreation on State lands are key concerns of the Public Trust, the CSLC requests that the EIR revisit potential mitigation for these significant impacts. The CEQA Guidelines require that "each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so" (CEQA Guidelines § 21002.1(b)). Although it may not be physically possible to avoid the effects to surfing and beach access in the design and construction of the project, SCWA can still identify feasible, appropriate offsets for or compensation to the affected public. As defined in the CEQA Guidelines, mitigation can entail "compensating for the impact by replacing or providing substitute resources or environments" (§ 15370(e)). Mitigation for impacts to recreation may come in the form of improved access or other improvements to nearby beaches, construction of other facilities for beachgoers or surfers, production of maps that can guide visitors to other nearby beaches or surf spots, or other measures. Ideas for measures may be solicited from recreation stakeholder groups or others. S_CSLC-7

Cultural Resources Comments

8. In the introduction to the EIR's Cultural Resource Impact Analysis (p. 4.8-13), the EIR mistakenly states that in the subsequent section, "impacts associated with traffic and transportation are summarized and categorized..." Please change "traffic and transportation" to "cultural resources". S_CSLC-8

9. The Background Research and Records Search Results section lists sources ESA reviewed during the records search; however, the CSLC was not contacted to conduct a records search of the CSLC's Shipwreck Database (Database). CSLC staff searched the Database for possible shipwrecks in the project area. The Database lists the schooner Sovereign as having grounded in 1873 at the Russian River. This information may have been taken from the book "California Shipwrecks: Footsteps in the Sea," by Don B. Marshall, Superior Publishing Company, Seattle, 1978, (Marshall), which states on p. 122 that the Sovereign was "[a] total loss at Russian River." The date of the incident is listed as "1/1873" in Marshall; however, the CSLC Database lists 7/21/1873. CSLC files contain no additional information on this incident. Although the database reflects a search of many published sources, it does not represent actual fieldwork. Not all shipwrecks are listed in the CSLC S_CSLC-9

Database and shipwreck locations may be inaccurate. Most shipwreck locations have not been determined. Although the project area is highly disturbed from repeated breaching using heavy equipment, the ocean and beach are a dynamic environment. Therefore, it is possible that future work could uncover a shipwreck or other related artifacts. S_CSLC-9 cont.

10. Table 4.8-1 lists cultural resource studies within or adjacent to the estuary study area, including an archaeological excavation of a coffin on Penny Island in 1982. Please note that Penny Island is also referred to as Crab Island (historical). Please also discuss the history of the island relative to potential historic or archaeological resources. S_CSLC-10

11. Mitigation Measure 4.8.1 outlines measures to be implemented in the event of an inadvertent discovery of historic and unique archeological resources, including state and federal agencies to be contacted. However, the CSLC is not, and should be, listed. Please be aware that title to all abandoned shipwrecks, archaeological sites, and historic resources on or in the tide and submerged lands of California is vested in the state, and are under the jurisdiction of the CSLC. Any submerged archaeological site or submerged historic resource remaining in state waters for more than 50 years is presumed to be significant. Under item 1 of the mitigation measure, we request that you add the CSLC to the list of agencies to be immediately notified in case of an inadvertent discovery of a shipwreck or related artifacts. We also request that a qualified *maritime* archaeologist examine any shipwreck or related artifacts to evaluate the significance of the find. Under item 2 of the mitigation measure, please add the CSLC as an agency that must provide approval of a research design for a shipwreck or related artifacts. Please also add the CSLC to the description of the Mitigation Measure in the Executive Summary (ES-26) and any other related sections. S_CSLC-11

<u>Cumulative Impacts Comments</u>

12. In the Executive Summary, Table ES-2 (p. ES-29) indicates that Impact 5.1, "Short-term (Construction-related) Cumulative Impacts," is "Less than Significant with Mitigation," but that no mitigation is required. Please change the response in the "Mitigation Measures" column from "None Required" to "Mitigation Measures in Section 4," or something similar. Please also change Impact 5.1's impact determination in the body of the EIR (p. 5-32) from "Less than Significant" to "Less than Significant with Mitigation." S_CSLC-12

Thank you for the opportunity to comment on the Draft EIR for the Project. As a Responsible and Trustee Agency, the CSLC will need to rely on the Final EIR for the issuance of a new lease and, therefore, we request that you consider our comments prior to adoption of the EIR. Please send additional information on the Project as plans become finalized.

Please contact Ninette Lee, Public Land Management Specialist, at 916-574-1869 or by email at ninette.lee@slc.ca.gov, for information concerning the CSLC's leasing requirements. For questions involving the Shipwreck and Historic Resources Program, please contact Senior Staff Counsel Pam Griggs at (916) 574-1854 or by email at pamela.griggs@slc.ca.gov. For questions concerning the environmental review, please contact Sarah Sugar, Environmental Scientist, at (916) 574-2274 or by e-mail at sarah.sugar@slc.ca.gov.

Sincerely,

Cy R. Oggins, Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
N. Lee, CSLC
S. Sugar, CSLC
J. DeLeon, CSLC
P. Griggs, CSLC

California State Lands Commission, Cy Oggins, February 10, 2011

S_CSLC-1 The text on pages 2-29, 4.4-64, and 4.6-6 of the Draft EIR has been revised as follows:

2.7.2 Existing Permits and Agreements

The Water Agency currently manages the artificial breaching of the barrier beach in compliance with a number of federal and State permits and agreements. These include authorizations from NMFS, USACE, State Parks, the California State Lands Commission, the California Coastal Commission, CDFG, and North Coast Regional Water Quality Control Board (NCRWQCB). Specifically, these permits and agreements include:

1. NMFS Marine Mammal Protection Act Incidental Harassment Authorization
2. USACE Clean Water Act Section 404 Permit (File No. 221211N)
3. California State Parks temporary use permit
4. State Lands Commission General Lease for Public Agencies (PRC 7918.9)[1]

"Since 1996, the Sonoma County Water Agency ~~possesses~~ operated artificial breaching under a general rent-free land use lease permit issued by the CSLC, in accordance with Article 2 of the Leasing and Permitting Regulations, to conduct artificial breaching within CSLC jurisdiction (CSLC, 2007). The Water Agency's most recent lease expired as of December 31, 2010, and an application for renewal of this land use lease is pending review by CSLC. However, this lease has a hold-over clause that provides a month-to-month lease while a new lease is under review. The Water Agency submitted a lease application prior to the December 31, 2010 expiration of the existing lease.

S_CSLC-2 "Species specific avoidance and minimization measures", as specified in Draft EIR Section 4.4, Biological Resources, Mitigation Measures 4.4.1, would include pre-construction surveys, employee environmental awareness training, and establishment of an appropriate avoidance buffer in consultation with regulatory agencies. No additional mitigation is required.

S_CSLC-3 All Water Agency beach management activities are monitored by Water Agency biological staff, pursuant to Draft EIR Mitigation Measure 4.4.1a (Section 4.4, Biological Resources, page 4.4-71). No additional mitigation is required.

S_CSLC-4 Text on page 4.4-73 under the Impact 4.4.2 and Impact 4.4.3 headings has been revised as follows:

> "Implementation of **Mitigation Measure 4.4.1b**.
>
> Impact Significance <u>After Mitigation</u>: Less that Significant with Mitigation."

S_CSLC-5 Please refer to discussion on page 4.4-76, of Draft EIR Section 4.4, Biological Resources, which discusses potential migration of Coastal and Valley Freshwater Marsh (CVFM) to upland areas that are currently dominated by North Coast Riparian Scrub. As noted in this discussion, although conversion would be subject to several factors, this potential conversion would likely occur throughout the estuary, and may result in an increased distribution of CVFM. As noted in CDFG comments on the Draft EIR, CDFG agrees with the Draft EIR's findings that changes in vegetation assemblages would likely result in increases in sensitive Coastal and Valley Freshwater Marsh habitat, and that these vegetation distribution changes would be beneficial from a habitat perspective.

S_CSLC-6 The text reference in the first paragraph of Impact 4.4.9, Draft EIR Section 4.4, Biological Resources, page 4.4-82 has been revised as follows:

> "This could change the jurisdictional limits of federal and state waters, including wetlands, in the Estuary. Because potential effects of the lagoon adaptive management on natural communities addressed freshwater marsh, which would be considered wetlands (see Impact 4.4.6~~7~~, Natural Communities), this discussion focuses on waters (i.e., open waters of the Russian River)."

S_CSLC-7 Please refer to **Master Response 2. 6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility** in **Chapter 2, Master Responses**.

S_CSLC-8 The text on page 4.8-13, of Section 4.8, Cultural Resources, has been revised as follows:

> "Impacts associated with ~~traffic and transportation~~ <u>cultural resources</u> are summarized and categorized as either "less than significant," "less than significant with mitigation," or "significant and unavoidable."

S_CSLC -9 The text on page 4.8-5, of Section 4.8, Cultural Resources, under the heading "Background Research and Records Search Results", has been modified to include the following:

> <u>"California State Land's Commission (CSLC) staff search the CSLC Shipwreck Database (Database) for possible shipwrecks in the Estuary Study Area. The Database lists that the schooner *Sovereign* was grounded at the</u>

Russian River in 1873. This information may have been taken from Marshall (1978), which states that the Sovereign was a "total loss at Russian River" on "1/1873" (Marshall, 1978:122). The CSLC Database lists the incident as 7/21/1873 with no additional information. It should be noted however that not all shipwrecks are listed in the CSLC Database and that shipwreck locations may be inaccurate.

Reference: Marshall, Don B., *California Shipwrecks: Footsteps in the Sea.* Superior Publishing Company, Seattle, 1978."

S_CSLC-10 No additional prehistoric or historic-period archaeological resources or historical resources have been recorded on Penny Island. Potential for undocumented cultural resources in the project area is low; areas of the island that would be impacted by the project are flooded annually and previous surveys have not located cultural resources in this location. See text changes, below, for additional information on Penny Island:

The text on page 4.8-4, of Section 4.8, Cultural Resources, has been revised as follows:

"In 1867 John Rule purchased 4,000 acres of Rancho Muniz at the mouth of the Russian River. The following year, Charles Jenner reportedly received permission from Rule to erect a small house on the north side of the Russian River and named the spot Jenner Gulch. In 1905 the Redwood Lumber Company mill was erected on the south side of the river. It was later rebuilt upriver at Duncans Mills. Jenner School opened in 1905 for children of the mill workers. In the 1920s the Penny brothers owned and lived on the 29-acre island in the Russian River (now called Penny Island; Twohy, n.d.). Following the death of one brother, the surviving Penny asked longtime friend Joe Santos to take care of him until his death and bury him on the island. In return the island was deeded to him. The Santos family built a house and lived on the island until 1948 (Schwaderer and Stardford, 1982; Twohy, n.d.). One coffin has been found on the island that may be associated with the Penny brother; however, this has not been substantiated (Schwaderer and Stardford, 1982:7)."

S_CSLC-11 The text on page 4.8-13, of Section 4.8, Cultural Resources, has been revised as follows:

"Mitigation Measure 4.8.1: The Water Agency will implement the following measure:

Inadvertent Discovery of Historical and Unique Archaeological Resources. If discovery is made of items of historical or archaeological interest, the contractor shall immediately cease all work activities in the area (within approximately 100 feet) of discovery. Prehistoric

archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; ~~and~~ deposits of metal, glass, and/or ceramic refuse, and shipwreck remains. After cessation of excavation the contractor shall immediately contact the Water Agency, State Parks, ~~and~~ the U.S. Army Corps of Engineers, and the California State Lands Commission. The contractor shall not resume work until authorization is received from ~~both~~ all agencies.

1. In the event of unanticipated discovery of archaeological materials occurs during construction, the Water Agency shall retain the services of a qualified professional archaeologist to evaluate the significance of the items prior to resuming any activities that could impact the site. A qualified maritime archaeologist shall be retained to examine shipwreck remains or related submerged artifacts if discovered near the river mouth during outlet channel creation or maintenance.

2. In the case of an unanticipated archaeological discovery, if it is determined that the find is potentially eligible for listing in the California and/or National Registers, and the site cannot be avoided, the Water Agency shall provide a research design and excavation plan, prepared by a qualified archaeologist, outlining recovery of the resource, analysis, and reporting of the find. The research design and excavation plan shall be approved by the Water Agency, State Parks, and U.S. Army Corps of Engineers. The California State Lands Commission shall provide approval of a research design for shipwreck remains or related submerged artifacts. Implementation of the research design and excavation plan shall be conducted prior to work being resumed. Upon project approval, the Water Agency will coordinate with State Parks and U.S. Army Corps of Engineers to develop an action plan that can be implemented in the event that flooding is imminent and breaching must occur immediately.

Impact Significance after Mitigation: Less than Significant."

S_CSLC-12 The text on page 5-32, of Chapter 5.0, Cumulative Analysis, has been revised as follows:

"Mitigation Measures in **Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures**.

Impact Significance: Less than Significant with Mitigation."

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California Regional Water Quality Control Board
North Coast Region
Bob Anderson, Chairman

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

February 12, 2010

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

Subject: Comments on the Draft Environmental Impact Report for the Russian River Estuary Management Project, SCH No. 2010052024

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Russian River Estuary Management Project. We appreciate the chance to participate early in the environmental review process. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The project proposes to manage the Russian River Estuary with primary dual objectives of enhancing rearing habitat for juvenile salmonids and managing estuary water levels to minimize flood hazard. The project consists of continuing the practice of artificially breaching the barrier beach outside the lagoon management period (May 15 through October 15) and adaptively managing a lagoon outlet channel to achieve an average daily water surface elevation of at least seven feet during the lagoon management period.

Regional Water Board staff have reviewed the DEIR for the Russian River Estuary Management Project and offer the following recommendations and comments.

General Comments

The mission of the State Water Resources Control Board and Regional Water Boards is to preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. The quality of surface and ground waters in the North Coast Region of California is governed by the *Water Quality Control Plan for the North Coast Region* (Basin Plan) and state-wide Policies. The Basin Plan identifies the existing and potential beneficial uses of water within the North Coast Region and the water quality objectives necessary to protect those uses. The water quality objectives of specific concern to Regional Water Board staff are outlined

in the following sections. Together water quality objectives, beneficial uses, the anti-degradation policy, and implementation policies are known as water quality standards. The Russian River Estuary Management Project should comply with the water quality standards within the Project area.

Russian River Water Quality Impairments

Section 303(d) of the federal Clean Water Act and 40 CFR §130.7 require states to identify water bodies that do not meet water quality standards and are not supporting their beneficial uses. These waters are placed on the Section 303(d) List of Water Quality Limited Segments (also known as the list of Impaired Waterbodies). The List identifies the pollutant or stressor causing impairment and establishes a schedule for developing a control plan to address the impairment. The 2010 List includes the following three impairments for the Russian River within the Project area: sedimentation/siltation, temperature, and indicator bacteria. S_NCRWQCB-1

Regional Water Board staff are currently developing a pathogen total maximum daily load (TMDL) for the Russian River to address the indicator bacteria impairments and a temperature implementation policy to address the temperature impairment. The sediment impairment in the Russian River watershed is addressed, in part, by the *Total Maximum Daily Load Implementation Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region* (Resolution No. R1-2004-0087).

Water Quality Areas of Concern

The following are topics that Regional Water Board staff believe may include adverse impacts to water quality and violations of water quality objectives under the Russian River Estuary Management Project, and a brief explanation of why violations of these objectives are a concern.

Biostimulatory Substances & Bacteria:

The Biostimulatory Substances Water Quality Objective states:

> *Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.*

S_NCRWQCB-2

The Bacteria Water Quality Objective states:

> *The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels. In no case shall coliform concentrations in waters of the North Coast Region exceed the following: In waters designated for contact recreation (REC-1), the median fecal coliform concentration based on a*

minimum of not less than five samples for any 30-day period shall not exceed 50/100 ml, nor shall more than ten percent of total samples during any 30-day period exceed 400/100 ml (State Department of Health Services).

Per the *Draft Guidance for Fresh Water Beaches* (DHS 2006), freshwater beach posting is recommended when single sample levels exceed the following thresholds: 1) Total coliforms - 10,000 MPN/100mL; 2) E. coli - 235 MPN/100mL; and 3) Enterococcus - 61 MPN/100 mL.

Regional Water Board staff concurs with the DEIR's finding that the Project could adversely affect water quality due to increased biostimulatory substances, such as nitrogen and phosphorus, and increased bacteria levels in the Estuary. Exceedances of Department of Health Services freshwater beach indicator bacteria thresholds have occurred in the Estuary during closed conditions and with an increase in the residence time during the lagoon management period, exceedances are likely to continue to occur and be of longer duration. S_NCRWQCB-2

Additionally, elevated water levels in the Estuary have the potential to inundate residential septic systems located near the shore and cause system failures, which could lead to discharges in violation of the Basin Plan and exceedances of water quality standards for bacteria and biostimulatory substances. S_NCRWQCB-3

<u>Dissolved Oxygen:</u>

The Dissolved Oxygen Water Quality Objective for the Project area of the Russian River is: "T*he instantaneous minimum concentration of dissolved oxygen (DO) required is 7.0 mg/L. Half of the monthly mean DO values for the year must be 10.0 mg/L or greater."*

The DEIR states that the Project will likely contribute to longer periods of hypoxic and anoxic conditions within the deepest portions of the Estuary, which will result in exceedances of the dissolved oxygen water quality standard. The DEIR does not describe possible impacts to the beneficial uses of the deepest portions of the Estuary, such as bottom-dwelling fish and invertebrates, and Regional Water Board staff recommend further monitoring to determine the extent of impacts. S_NCRWQCB-4

<u>Impacts from the Fish Habitat Flows and Water Rights Project:</u>

The Fish Habitat Flows and Water Rights Project has the potential to cause changes in water levels within the Russian River Estuary. Further impacts to the Estuary from the Fish Habitat Flows and Water Rights Project is a critical factor to evaluate and, if necessary, mitigate. S_NCRWQCB-5

<u>Geographic Extent of Analysis:</u> S_NCRWQCB-6

As stated in the DEIR, "Under certain closed conditions, the Estuary may backwater to Monte Rio, and as far upstream as Vacation Beach. Although this condition may periodically occur, potential impacts related to water quality are generally thought to be limited to the seven mile area downstream of Austin Creek" (p. 4.3-1). Regional Water Board staff recommend additional information be provided to demonstrate the lack of potential water quality impacts between Austin Creek and Vacation Beach or additional analysis of potential impacts in this upstream reach of the Estuary's backwater. S_NCRWQCB-6 cont.

Estuary sediment quality

The State Water Resources Control Board has establish sediment quality criteria for enclosed bays and estuaries. The DEIR does not include a discussion on compliance with these water quality standards. We recommend that this issue be discussed in trhe final EIR. S_NCRWQCB-7

Clean Water Act Section 401 Water Quality Certification:

The project requires a Clean Water Act Section 401 Water Quality Certification (Certification) for the breaching activities. Past beaching activities have been covered by an existing Certification. The current Certification has had its expiration date amended twice, with the current expiration date being December 31, 2011. The Sonoma County Water Agency has submitted an application for the proposed new methods of estuary management and breaching. Regional Water Board staff are currently reviewing the application and will address the water quality areas of concern that are described above during the certification process. S_NCRWQCB-8

Concluding Comments

Regional Water Board staff supports the objective of the Project to enhance the quality of rearing habitat for juvenile salmonids. Staff further recognizes the potential conflicts between compliance with the National Marine Fisheries Service Biological Opinion and attaining water quality standards. We recognize that the inclusion of mitigation measures to avoid significant impacts to water quality may be infeasible. However, we strongly recommend that a robust water quality (as well as estuary sediment quality) monitoring program be developed and that collected data be made available to responsible agencies as well as the general public. S_NCRWQCB-9

In addition, contingency plans should be developed to provide signage and public outreach if monitoring identifies exceedances of any recognized water quality standard intended to protect public health. We concur with the Project's Adaptive Management Plan provisions for breaching in the event that water quality conditions warrant such action. Staff are available to consult with Sonoma County Water Agency staff as part of the adaptive management effort and in identifying appropriate measures to mitigate water quality impacts caused by the Project. S_NCRWQCB-10

Again, we thank you for the opportunity to comment. We look forward to continuing to work with Water Agency staff on this Project in our efforts to protect water quality. If you have any questions regarding these comments, you may contact me at (707) 576-2065 or jshort@waterboards.ca.gov

Sincerely,

Original signed by

John Short
Senior Water Resource Control Engineer

Cc: Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812
Re: SCH No. 2010052

North Coast Regional Water Quality Control Board, John Short, February 12, 2011

S_NCRWQCB-1 Commenter is discussing 303(d) list impairments in the Russian River and the NCRWQCB's development of a pathogen total maximum daily load (TMDL). No response or revision of text is required.

S_NCRWQCB-2 Commenter concurs with Draft EIR analysis conclusions regarding potentially adverse water quality effects related to increased biostimulatory substances, such as nitrogen and phosphorus, and increased bacterial levels in the Estuary. No response or revision of text is required.

S_NCRWQCB-3 The Draft EIR assessed the potential contribution to higher surface and groundwater conditions, which could adversely affect septic system performance. As noted in Impact 4.13.4, the Russian River Biological Opinion directed the Water Agency to evaluate the types of properties, structures, and associated infrastructure that would potentially be inundated under altered water levels. Preliminary analysis conducted by the Water Agency identified septic systems within the Estuary study area that could be subject to higher water levels during the Lagoon Management Period. The preliminary analysis documented several septic leach fields that, with increased water levels above 10 to 12 feet over a longer duration, could result in secondary effects from increased groundwater seepage and corresponding increased groundwater level. However, the Estuary Management Project targets 7 to 9 feet water elevations, consistent with levels that are currently experienced in the Estuary. Although the duration of these water levels would increase under the Estuary Management Project septic failures as a result of the Estuary Management Project (either direct or indirect) leading to direct discharges in violation of the Basin Plan and exceedances of water quality standards for bacteria and biostimulatory substances are not anticipated.

S_NCRWQCB-4 As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting, Water Agency monitoring of Estuary conditions have observed naturally occurring anoxic and hypoxic conditions during both open tidal and closed estuary lagoon conditions. These naturally occurring conditions are not considered adverse to beneficial uses within the Estuary; although their occurrence represents a habitat limitation for some species, these conditions are considered part of the physical process of the Estuary. Refer to Draft EIR Impact 4.5.2 in Section 4.5, Fisheries, for a discussion addressing anoxic conditions that may make habitat in certain deep pools areas unavailable for some species for a longer duration during the Lagoon Management Period; however other suitable habitat is available outside of these localized anoxic areas. Water Agency monitoring required under the Russian River Biological Opinion would continue to inform the adaptive management plan regarding

the availability of beneficial juvenile salmonid habitat within the Estuary. Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for a discussion of water quality impacts.

S_NCRWQCB-5 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**. As discussed in Draft EIR Chapter 3.0, Project Background and Environmental Setting, water levels of between 7 and 9 feet regularly occur during closure events. Successful implementation of the proposed project would increase the duration of these water levels during the Lagoon Management Period. It is anticipated that successful creation of the outlet channel will increase water surface elevations to between 7 and 9 feet, regardless of inflow levels into the Estuary. As such, lower flows associated with either hydrologic conditions, or revisions to Decision 1610, would not alter water levels, which would be established by the outlet channel, during the Lagoon Management Period. Depending upon the hydrologic year, the general fill rate of the Estuary, which is on the order of 0.5 foot per day, may vary. A discussion of potential cumulative impacts related to the Fish Flow Project is provided in Draft EIR Chapter 5.0, Cumulative Impacts.

S_NCRWQCB-6 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2 Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

S_ NCRWQCB-7 In 2008, the State Water Resources Control Board (SWRCB) adopted Sediment Quality Objectives (SQOs) and an implementation policy for bay and estuaries in the State (Part 1). Part 1 includes narrative SQOs for the protection of aquatic life and human health; identification of the beneficial uses that these objectives are intended to protect; and program of implementation. The SWRCB is proposing amendments to the Sediment Quality Plan for Enclosed Bays and Estuaries to incorporate additional SQOs for the protection of wildlife and finfish and implementation policy. The Russian River Estuary is not currently listed on the Current Toxic Pollutant 303(d) List Impairments for Bays and Estuaries in California, and no SQOs have been identified for the Russian River Estuary. As discussed in Draft EIR Section 4.2, Hydrology and Flooding, page 4.2-16, the proposed change in the base-level of the water surface would have little-to-no impact upon the rate of sediment transport through, or deposition within, the Estuary, and the potential impact of the project upon sedimentation would be less than significant.

S_NCRWQCB-8 The Water Agency will continue to work with the (North Coast Regional Water Quality Control Board) NCRWQCB regarding Clean Water Act 401

Water Quality Certification issuance. No response or revision of text is required.

S_NCRWQCB-9 The Water Agency appreciates the NCRWQCB's support of the overall objectives of the Estuary Management Project to enhance the quality of rearing habitat for juvenile salmonids, and concurs that inclusion of mitigation measures to avoid significant impacts to water quality the proposed project may be infeasible. The Water Agency looks forward to continued coordination with NCRWQCB regarding monitoring efforts to satisfy the requirements of the Russian River Biological Opinion, and making data available to the general public.

S_NCRWQCB-10 Consistent with its jurisdiction, the Sonoma County Department of Public Health is responsible for posting of signage if monitoring identifies exceedences of any recognized water quality standard intended to protect public health. The Water Agency will continue its current Estuary water quality monitoring program, and will modify that program to gather appropriate water quality information, in consultation with regulatory agencies, as needed. Ongoing monitoring will be required for the Estuary Management Project. The Water Agency will continue to consult with the SWRCB and NCRWQCB to determine the parameters, water quality standards, and monitoring locations.

Monte Rio Recreation and Park District
20488 Highway 116 – P.O. Box 877, Monte Rio, CA 95462
Ph: 707-865-2487 – Fax 707-865-0229
Email: roberta@mrrpd.org

February 14, 2011

Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Attention: Jessica Martini-Lamb

Dear Ms. Martini-Lamb:

We are writing to you regarding the proposed Estuary Project that is being developed, and specifically the Environmental Impact Report which was ordered by the National Marine Fisheries Service.

Monte Rio Recreation and Park District (MRRPD) is very concerned that the EIR does not take into consideration issues of health and safety risks that are likely to occur by developing the planned barrier at the mouth of the River. Based on the empirical findings of the 2009 Russian River Photo report, it is our understanding that the *Estuary Project* will cause water to back up as far as Vacation Beach and may cover as much as 25% of the Monte Rio beach itself (the full account is available at www.rrwpc.org). The many concerns cited in the report include bank erosion; decline in public safety (water depth increase, causing loss of beach front and increased hazardous swimming conditions); stagnant/brackish water which will erode native plants both within the river and on in its banks; a disruptive increase in algae bloom, and the continued rapid growth of the invasive Ludwigia plant. Upon these disconcerting revelations, MRRPD held a special workshop in April of 2010 which only bolstered the findings of the RR Photo report. L_MRRPD-1

Featuring U.C. Davis Invasive Plant Expert, Dr. Brenda Greewell, who discussed the negative implications the Ludwigia plant has on the beaches ecosystem by reducing light below the mat, displacing native vegetation and disrupting recreation activities. L_MRRPD-2

Our summer beach rental business is essential to our financial health and well-being, and is also our largest source of revenue throughout the year. The loss of any portion of our beach in Monte Rio would mean that we would not be able to utilize our boardwalks or place our concession stand and boat rental stand in a safe and convenient location for people wishing to rent canoes, kayaks and tubes. This will place a tremendous hardship on our small entity and only add to the immense pressures now faced by small local entities. L_MRRPD-3

MRRPD looks forward to starting an open dialogue with your agency and would like to invite you to come out and tour our beaches and meet with our Directors. You can reach us by contacting our Administrator, Roberta Pollard at, 707-865-2487. L_MRRPD-4

Sincerely,

Stephen K. Baxman
Board Chair

Monte Rio Recreation and Park District, Stephen Baxman, February 14, 2011

L_MRRPD-1 Please refer to **Master Response 2.4, Water Quality, and Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility,** in **Chapter 2, Master Responses** for discussions of recreation and water quality impacts.

L_MRRPD-2 Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for a discussion of water quality impacts, sedimentation, algal growth, and *Ludwigia*.

L_MRRPD-3 Please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility,** in **Chapter 2, Master Responses** for a discussion regarding CEQA requirements relevant to potential socioeconomic impacts.

L_MRRPD-4 The MRRPD will be notified of information relevant to the Estuary Management Project.

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COPY

NORTHERN SONOMA COUNTY AIR POLLUTION CONTROL DISTRICT

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY
FEB - 9 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

February 8, 2011

Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

RE: Comments on the Water Agency's Russian River Estuary Management Project

Dear Jessica,

Thank you for the opportunity to comment on the subject project. The Northern Sonoma County Air Pollution Control District (NSCAPCD, or District) has reviewed the project draft environmental impact report and wishes to submit the following comment for the Water Agency's consideration.

For most construction projects, the District's primary concerns are on-road and off-road vehicle emissions, airborne dust generated during construction, and potential disturbance of rock containing naturally-occurring asbestos. Given the Russian River Estuary Management Project's nature and location, airborne dust and naturally-occurring asbestos are not issues for this project. L_NSCAPCD-1

Regarding vehicle emissions, the District is in agreement that the on-site equipment and transport vehicles necessary to implement the project would not result in a significant impact to air quality. The District does recommend that the Water Agency conduct vehicle activities in keeping with the laws of the State of California; specifically, the off-road heavy-duty diesel vehicle regulation. Mainly, this regulation requires owners of off-road equipment to label the equipment and report the equipment to the California Air Resources Board; the regulation also limits equipment idling time to cut down on unnecessary diesel emissions. A fact sheet containing the most up-to-date information for off-road diesel equipment is enclosed for your reference. The District also recommends that should any portable equipment (e.g. portable generators or compressors) be utilized during estuary management, such equipment should either be permitted with the District or registered under the California Air Resources Board Statewide Portable Equipment Registration Program. L_NSCAPCD-2

The District appreciates your willingness to consider these issues in your review of the Russian River Estuary Management Project. We look forward to working with you in the future. If you have any questions about our comments, please contact either Barbara Lee (the District's Air Pollution Control Officer), or me, at 707-433-5911.

Best regards,

Jessica DePrimo
Air Quality Specialist III

Encl: off-road diesel equipment fact sheet

California Environmental Protection Agency | AIR RESOURCES BOARD

FACTS ABOUT

Off-Road Diesel Vehicle Regulation Compliance Requirements Summary

January 14, 2011

On July 26, 2007, the California Air Resources Board (ARB) approved and subsequently adopted a regulation to reduce diesel particulate matter (PM) and oxides of nitrogen (NOx) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. At its December 2010 hearing, the Board considered and made findings on the need for amendments to the regulation.[1] This fact sheet describes the December 2010 amendments. For general information about the regulation, see the off-road regulation knowledge center at http://www.arb.ca.gov/msprog/ordiesel/knowcenter.htm.

Who must comply with the off-road regulation?

Any person, business, or government agency that owns or operates diesel-powered off-road vehicles in California (except for agricultural or personal use, or for use at ports or intermodal railyards) with engines with maximum power of 25 horsepower (hp) or greater are subject to the regulation. The regulation applies to vehicles commonly used in construction, mining, rental, airport ground support and other industries. Out-of-state companies doing business in California are also subject to the regulation.

What types of vehicles are subject to the off-road regulation?

The regulation applies to self-propelled diesel-fueled vehicles that cannot be registered and licensed to drive on-road, as well as two-engine vehicles that drive on-road, with the limited exception of two-engine sweepers . Examples include loaders, crawler tractors, skid steers, backhoes, forklifts, airport ground support equipment, water well drilling rigs, and two-engine cranes. The regulation does not apply to stationary equipment or portable equipment such as generators.

What changes to the off-road regulation do the December 2010 amendments include?

- A four year delay from the original timeline for all fleets, making the first compliance deadline January 1, 2014, for large fleets (over 5,000 hp), January 1, 2017, for medium fleets (2,501-5,000 hp), and January 1, 2019, for small fleets (2,500 hp or less).
- A dramatic reduction and simplification in the annual requirements for fleets, and fleet average structure. Fleets now have only one fleet average target to meet based on their NOx emissions; if they cannot meet the fleet average target, they are required to clean up 5 to 10 percent of their horsepower annually, as opposed to the previous requirement of 28 to 30 percent.
- Making exhaust retrofits no longer mandatory.
- Raising the low use threshold to 200 hours per year instead of 100 hours.
- Overall, staff estimates that these amendments reduce the compliance costs by more than 95 percent during the first five years and more than 70 percent during the entire span of the regulation, compared to the regulation before the amendments.

What do I need to do now?

The off-road regulation as initially adopted requires reporting and labeling, limits unnecessary idling, and requires disclosure of the regulation upon vehicle sale. These requirements are not affected by the December 2010 amendments, and enforcement actions for these requirements are ongoing, with fines of up to $10,000 per day possible for each vehicle that is in violation.

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[1] The Board delegated to the ARB Executive Officer responsibility to complete the regulatory process and make a final determination on whether the amendments should be adopted.

If a fleet has not done so already, it should report all applicable vehicles to ARB as soon as possible and label its vehicles appropriately. Fleets should also comply with the five-minute idling limit and maintain a written idling policy as required. When selling an affected vehicle, the seller should notify the vehicle buyer of the regulation.

Although the December 2010 amendments include a significant delay of the regulation's first compliance dates, planning now could reduce or spread out future compliance costs. Fleets could earn credit for taking early actions to reduce emissions, such as repowering or replacing their older, dirtier vehicles, and installing exhaust retrofits.

What reporting and labeling does the regulation require?

The regulation required fleets to initially report all applicable vehicles to ARB in 2009. After reporting, fleets had to label their vehicles with the Equipment Identification Numbers (EINs) assigned by ARB.

After the initial reporting and labeling, fleets must report any additions to their fleet or retirements from their fleet within 30 days. Fleets must also submit annual guarantees that they are in compliance on March 1. Large fleets must submit such affirmations each year through 2023, medium fleets each year from 2016-2023, and small fleets each year from 2018-2028.

For more information on reporting, please call 1-877-59DOORS (1-877-593-6677).

What limits does the regulation place on idling?

Vehicles subject to this regulation may not idle for more than five consecutive minutes. However, the idling limit does not apply to necessary idling such as idling to verify that a vehicle is in safe operating condition, for testing, serving, repairing, or diagnostic purposes, or to accomplish work for which the vehicle was designed. Medium and large fleets are also required to have a written idling policy made available to the operators of the vehicles that informs them of this five-minute idling limit.

What are the off-road regulation's performance requirements and when do they take effect?

The off-road regulation's performance requirements are based on a fleet's average NOx emissions. If a fleet cannot meet the NOx fleet average target, it must comply with the regulation's Best Available Control Technology (BACT) requirements by cleaning up 5 to 10 percent of its fleet each year it cannot meet the target. A fleet may satisfy the BACT requirements either by turnover or applying exhaust retrofits.

Under the December 2010 amendments, the performance requirements would take effect on January 1, 2014, for large fleets, January 1, 2017, for medium fleets, and January 1, 2019, for small fleets. The performance requirements continue every year through January 1, 2023, for large and medium fleets and January 1, 2028, for small fleets.

Does the off-road regulation require installing exhaust retrofits?

No, under the December 2010 amendments, fleets will be able to comply with the performance requirements of the off-road regulation solely through turning over or repowering their vehicles. However, retrofitting may be your lowest cost compliance option. Applying exhaust retrofits can help fleets meet the fleet average targets and comply with the annual BACT requirements. Retrofits installed early can earn double credit and exempt a vehicle from further actions for the life of the regulation.

Am I exempt from the regulation if I only have one or two off-road vehicles?

No, but a new compliance option will make it easier to comply. Fleets with 500 horsepower or less will be able to comply by simply phasing out their oldest, dirtiest vehicles starting in 2019.

Where can I find more information about the off-road regulation?

Additional information and other fact sheets are available at: www.arb.ca.gov/ordiesel or by calling ARB's diesel hotline at (866) 6DIESEL (866-634-3735).

Northern Sonoma County Air Pollution Control District, Jessica DePrimo, February 8, 2011

L_NSCAPCD-1 No response or text modification required.

L_NSCAPCD-2 Commenter concurs with Draft EIR determination of no significant impact associated with transport vehicles required for project implementation. The Water Agency will comply with all applicable state laws relevant to operation of heavy machinery. The fact sheet is included in the record. No response or text modification required.

Russian River Recreation and Park District

P.O. BOX 195 • GUERNEVILLE • CALIFORNIA • 95446

February 4, 2011

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 7 2011

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd
Santa Rosa, Ca 95403

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Dear Ms. Martini-Lamb

The Russian River Recreation & Park District wishes to express its concerns about the "Russian River Estuary Management Project: Draft Environmental Impact Report" released on December 15, 2010. Please put our name and address on your notification list for all meetings and documents related to this project. L_RRRPD-1

The District is concerned about the separation of the Estuary Project from the "Fish Habitat flows and Water Rights Project". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. CEQA requires that the entire project be considered in one environmental document. "Low Flow" is inexorably linked to the Estuary Project through the BO. It is wrong to segregate the process. L_RRRPD-2

Our preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. L_RRRPD-3

Our District provides several river side parks and installs two summer recreation dams in the lower river for residents and visitors to enjoy swimming, fishing, kayaking, canoeing, and other forms of recreation. The District was established in 1941 to install summer dams for summer enjoyment of the Russian River by locals and tourists. L_RRRPD-4

The District is concerned about the impact to water quality from decreased water flow; including possible added pollution from nutrients, regulated and emerging toxins, bacteria, temperature, and invasive species. Reducing the flow will seriously impede the enjoyment of the river by residents and visitors to our riverside parks. L_RRRPD-5

The District is concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. L_RRRPD-6

The District is also concerned because in 2009 several locations along the lower river tested positive for enterococcus. During the last 10 years of bacteriological testing of the river there was only one positive test at Johnson's Beach in Guerneville. The test was in July 2002, the water tested positive for ecoli, but there was a documented sewage spill from Santa Rosa at the time. L_RRRPD-7

Again, our preferred project maintains estuary level at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. L_RRRPD-8

Sincerely,

Raina Zimmerman

Russian River Recreation & Park District Board of Directors
rec.park@gmail.com
(707)869-9184

Cc: 5th District Supervisor, Efren Carrillo

Russian River Recreation and Park District, Dana Zimmerman, February 4, 2011

L_RRRPD-1 Commenter is included on notification list.

L_RRRPD-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **please refer to Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**.

L_RRRPD-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Commenter is expressing preference for the Reduced Project Alternative. The Estuary Management Project proposes a target elevation of 7 feet with a 9 foot maximum; the Reduced Project Alternative includes an 8 foot maximum. Under the Reduced Project Alternative (8 foot maximum water level), structures would still be affected. As determined in the Draft EIR (Chapter 6.0, Alternatives Analysis, Section 6.7), the Reduced Project Alternative is identified as the environmentally superior alternative compared to the proposed project. It is not necessarily the "preferred alternative." Similarly, an Alternative Flood Control Alternative is presented and evaluated in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion, refer to **Master Response 2.5, Alternative Analysis**, in **Chapter 2, Master Responses**.

L_RRRPD-4 Comment is not directed to Draft EIR analysis; no response or text changes are necessary.

L_RRRPD-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **please refer to Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion related flows refer to **Master Response 2.4, Water Quality** in **Chapter 2, Master Responses**. Draft EIR Chapter 5.0, Cumulative Analysis concludes that recreational and water quality impacts associated with the Estuary Management Project, considered in conjunction with foreseeable effects associated with reducing minimum instream flows, could result in cumulatively considerable impacts. The Draft EIR reviews and discloses potential impacts to water quality associated with implementation of the Estuary Management Project (Section 4.3, Water Quality).

L_RRRPD-6 For a discussion of water quality, and analysis of best available data, please refer **to Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Contrary to the comment, all data gathered by the Water Agency regarding water quality monitoring in the Estuary has been and is being made available to the Regional Board.

L_RRRPD-7 As stated in Impact 4.3.3, Estuary Management Project implementation would not alter water quality inputs for bacteria or nutrients into the Estuary. Additionally the Water Agency does not have the authority to control inputs from other discharges. Refer to **Master Response 2.4**, **Water Quality**, in **Chapter 2**, **Master Responses**.

L_RRRPD-8 Commenter is expressing preference for Reduced Project Alternative. See response to comment L_RRRPD-3. No response or revision to the Draft EIR text is necessary.

3.2 Responses to Groups and Organizations Comments

This section includes copies of comment letters from interest groups and organizations and corresponding responses. Comment letters are arranged alphabetically by group acronym or name.

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Katie Blank

From: Jessica Martini Lamb [Jessica.Martini.Lamb@scwa.ca.gov]
Sent: Monday, January 31, 2011 1:13 PM
To: Katie Blank; estuaryproject
Cc: Records
Subject: FW: The Russian River Estuary Management Project:Draft Environmental Impact Report

Follow Up Flag: Follow up
Flag Status: Flagged

From: Pamela Conley [mailto:pamcon@comcast.net]
Sent: Monday, January 31, 2011 1:08 PM
To: Jessica Martini Lamb
Subject: The Russian River Estuary Management Project:Draft Environmental Impact Report

Sonoma County Water Agency
Attention: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403

January 31, 2011

Re: The Russian River Estuary Management Project: Draft Environmental Impact Report released on December 15, 2010

Dear Ms. Martini-Lamb,

The Biological Opinion has determined that the Water Agency should implement several actions to modify existing water supply and flood control activities in the Estuary Management Project to enhance better conditions for juvenile salmonids and steelhead.

I have sat in on a couple of public hearings regarding this Draft Impact Environmental Report (DEIR) proposal and listened to many of the public concerns. And I have several questions I would like to have answered.

My biggest concern is the lower flows to the Russian River and the impact it will have on the environment upstream. California Environmental Quality Act (CEQA) requires that the "whole" of a project must be considered in one EIR. However, the DEIR claims that its major purpose is to address the requirements of the Biological Opinion written and issued by NMFS with only the specification of taking in consideration the closing of the estuary and concern for flooding. How can the closing of the estuary NOT take in consideration the fish, birds, animals, and humans upstream from Forestville to Duncan Mills? G_ACA-1

The purpose of proposing lower flows in the Russian River downstream is to prevent flooding of a few properties in Jenner while keeping the mouth closed. These lower flows will affect the river as far upstream as Vacation Beach. Why then, does the DEIR only study the upstream area of Duncans Mills? G_ACA-2

If the Sonoma County Water Agency (SCWA) proposes lower flows, how can they not consider exacerbated serious water qualities such as agricultural pesticide runoff from the wineries, poor septic tank leakage, and algae blooms that can be extremely toxic to fish, birds, animals, and humans upstream and ignore the law of CEQA to study the project as a "whole"? G_ACA-3

There are several other species of fish that live in the Russian River besides the salmonids and steelhead and these fish live there all year. These fish are considered a part of the "whole" of the Russian River and would be subject to poor water quality as stated in the paragraph above if lower flows were implemented. How will lower flows to these G_ACA-4

seven species of fish be affected upstream? Again, how can these seven species not be considered part of the "whole" of this project upstream? G_ACA-4 cont.

There is a colony of seals located near the designated closure where the work would take place. The seals come here to rest and have their babies. These seals are the ambassadors of Jenner and bring tourists from all over the world to see them. They would certainly be disturbed by all the heavy machinery and work being done to close the bridge. Seals are a part of the "whole" of this considered project in this DEIR and they are located in the estuary not further upstream. How then can they not be considered in this report? G_ACA-5

According to National Marine Fisheries Services (NMFS), they are suggesting examples that have worked in the Santa Cruz area of California that have provided optimal habitat for the fish and their success are the models of this project. However, many of the lagoons' watersheds in the Santa Cruz area are much shorter in length than the Russian River. Furthermore, none of the examples from these watersheds in the Santa Cruz area given by NMFS have the urban/agriculture impact that the Russian River does. Why hasn't each of these example watersheds' differences been individually compared to the Russian River? G_ACA-6

At the public meeting I attended in Jenner on January 18th, several people I talked to and who addressed the Board, discussed a mutual distrust and suspicion regarding this project. Many residents in our community believe that this is just the first step to lower the flows of the Russian River for future development and agriculture needs. How can the SCWA, NMFS officials and supervisors alleviate these doubts to the community? It would be in their best interest to attempt to do so. If people from other areas stop coming to the Russian River for recreation, it would be economically devastating to the smaller cities including Guerneville, Monte Rio, and Duncans Mills. If it was discovered that it was a water grab, can Sonoma County afford several lawsuits that would definitely happen if our community was devastated with the loss of tourism in these hard economical times? G_ACA-7

West Sonoma County is the environmental conscience of Sonoma County. We have many environmental leaders who have volunteered time and money to protect our part of the county from poor timber harvest plans and degradation of our small bit of paradise here in West Sonoma County. There are many strong environmental leaders who have lived here a long time. Why haven't the SCWA and NMFS encouraged some of these leaders to step forward and present ideas? One of these leaders is Brenda Aldelman from Russian River Watershed Protection Committee. After studying this river for over 30 years she knows more about this river than anybody else. She and many spoke at the January 18th meeting. But my question is, will she or any others be called to come forth and participate? G_ACA-8

The big question is can the goals of this plan actually work? Many people spoke at the public meeting. There was a descendant of the Pomo community who spoke about getting rid of the barrier of the old remains of a train track in order to bring a natural state to the estuary. Larry Hanson, from Forest Unlimited stated the same suggestion. This plan has been brought up in my living room by my husband and and others who have lived here for years. The estuary projects' success will depend on the outcome. My question is what if it doesn't work? Will the loss of river, tourism, and economy, not to speak of the loss of wildlife upstream be worth the loss if it doesn't work? Survival of the fish is most important but fish and the entire ecosystem and human interaction must be considered. G_ACA-9

In closing, I would like to plead with you to follow the CEQA law to study the DEIR not just as an estuary closing, but consider the impact it will have on the Russian River as a "whole." You can not have an estuary for fish without a river. A river can not happen without the creeks, the song birds can not survive where there is no river that flows into an estuary that feeds the seagulls and harbor seals. And a tourist community can not survive with low flows that prohibit swimming, fishing, canoeing, and kayaking. Everything to the river and estuary are connected. Please, follow the CEQA law to consider the lower impacts of the Russian River as a "whole" to this project. G_ACA-10

Sincerely,

Pamela Conley
Austin Creek Alliance

Austin Creek Alliance, Pamela Conley, January 31, 2011

G_ACA-1 For a discussion related to the flows in the Russian River, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.** For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description and Impact Analysis**, in **Chapter 2, Master Responses**.

G_ACA-2 For a discussion related to the flows in the Russian River, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.** Please refer to **Master Response 2.2, Project Description and Impact Analysis, in Chapter 2, Master Responses**, for a discussion related to the geographic extent of analysis.

G_ACA-3 For a discussion of the relationship, and cumulative effects to water quality of the Estuary Management Project to the proposal to lower minimum instream flows as required by the Russian River Biological Opinion, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**.

G_ACA-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. With respect to fisheries, Draft EIR Section 4.5, Fisheries, includes an analysis of potential impacts to Endangered Species Act-listed and non-listed fish species. The Draft EIR concludes that there will be a beneficial increase in potential rearing habitat availability for juvenile salmonids. The analysis found that localized effects from the Estuary Management Project to fish managed under the Coastal Pelagic and Pacific Groundfish Fisheries Management Plans, as well as other marine fish species and macroinvertebrates that use portions of the Estuary, are unlikely to represent a substantial adverse affect. Therefore, impacts are considered less than significant. Please refer to Impact 4.5.2, Habitat quality on page 4.5-22 of the Draft EIR. Impact 4.5.2 finds that management of the Estuary could result in changes in water quality conditions which could be stressful for rearing salmonids, special status, and other native fish species inhabiting the Estuary. However, Impact 4.5.2 is found to be less than significant.

G_ACA-5 Draft EIR Section 4.4, Biological Resources evaluated the potential impacts on pinnipeds occupying the beach haulout site noted by the commenter. Please refer to Impact 4.4.1, Special-Status Plant and Animal Species, Marine Mammals, on page 4.4-69. Additionally, the Draft EIR evaluated the potential impacts on pinnipeds occupying the beach haulout site, as well as haulouts located within the mainstem of the Russian River Estuary. For this assessment, refer to Impact 4.4.8, Protected Marine Mammals, on page 4.4-79 of the Draft EIR.

G_ACA-6 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**. The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion.

G_ACA-7 The Russian River Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Russian River Biological Opinion covers all such activities. The specific project objectives of the Estuary Management Project are established in Draft EIR Chapter 2.0, Project Description (page 2-11), and include providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimizing flood hazard. The project objectives do not include lowering flows for future development or agricultural needs, which are not proposed as part of the project. Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**.

G_ACA-8 The Russian River Biological Opinion represents over 10 years of collaboration during the consultation process by federal nexus under Section 7 of the Endangered Species Act, involving USACE, Water Agency, NMFS and CDFG. The Section 7 consultation process under the Endangered Species Act formally includes regulatory agencies; however additional outreach to collaborate with the public and local agencies has been conducted over the past fourteen years. The environmental leaders referenced in the comment letters were included on the distribution list and invited to scoping meetings. Please refer to **Master Response 2.8, Public Review Process,** in **Chapter 2, Master Responses,** for discussion of scoping and public review processes implemented for the Estuary Management Project EIR.

G_ACA-9 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**, for a discussion of the feasibility of success of the proposed project. The modification of existing remnants of the jetty at the mouth of the Russian River was considered in the Draft EIR. Please refer to Draft EIR Chapter 6.0, Alternatives Analysis, Section 6.4.5 beginning on page 6-8.

G_ACA-10 Refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements,** and **2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility,** in **Chapter 2 Master Responses**.

P.O. BOX 215
POINT ARENA, CA 95468

February 10, 2011

Sonoma County Water Agency

Attn: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403
BY EMAIL

Subject: Comment - Estuary Management Project DEIR

Coast Action Group requests that you address the following issues arising from the " Russian River Estuary Management Project: Draft Environmental Impact Report" released by your Agency on December 15, 2010.

We are concerned with the separation of the Estuary Project DEIR from the Fish Habitat Flows and Water Rights Project (Fish Flow Project). The environmental impacts of the two projects are interrelated and should be reviewed in one document. Separation of consideration of the effects of these two projects is inconsistent with CEQA.

Lower river impacts from Dry Creek downstream should be fully explored and analyzed in the Estuary Project DEIR. CAG objects to the failure to consider effects the Estuary Project on "Fish Habitat Flows and Water Rights Project" (Fish Flow Project). The purpose of both projects is to fulfill requirements of the Biological Opinion (BO), which in part demands that river flows be managed to allow construction and maintenance of an estuary lagoon that will provide improved habitat for threatened fish (mainly steelhead) without flooding a few low-lying Jenner properties. The Fish Flow Project (FFP) is inexorably linked to the Estuary Project through the BO and should therefore be addressed in one environmental review. Furthermore, proposed changes of minimum flows at Hacienda from 125 cubic feet per second (cfs) to 70 cfs has had no other stated purpose than the prevention of flooding two buildings in Jenner when the mouth is closed and the lagoon rises to a level of 9' or higher. (The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making the necessity for low flow highly questionable.) Also, there is no serious proposal (as required under CEQA Alternatives Analysis) to lift and/or move these buildings out of the floodway. (See Mitigation Measure on page 4.2-20) The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish.

G_CAG-1

G_CAG-2

Please address the following issues:

CEQA requires that the entire project be considered in one environmental document. "Low flow" as called for in the lower river is inexorably linked to the Estuary Project through the BO. G_CAG-3
It is wrong to bifurcate the process. Water quality studies and environmental analysis should be required, at a minimum, for the entire lower river from the Dry Creek convergence on down. G_CAG-4
Impacts on recreation have been completely omitted and must be addressed. G_CAG-5

The Estuary Project only analyzes impacts up to Duncans Mills, whereas it is stated in the DEIR that impacts from closed mouth and flow alteration affects the river as far upstream as Vacation Beach. G_CAG-6

Recent historic evidence shows that SCWA can not control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This issue should be addressed in light of BO requirements. G_CAG-7

The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. G_CAG-8

The Regional Board has determined that some water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. We have been told that the outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. All available and relevant information must be made available to the public and reviewing agencies. G_CAG-9

The lower river experiences serious nutrient and bacteria problems. Low flows will effect bioaccumlation of pollutants. Low flows will effect colonization by invasive plants and hydrophytes. The DEIR states that there is concern about bacteria in the Estuary during the period of the closed lagoon. There is no definitive work addressing these issues in the DEIR. G_CAG-10

The DEIR document does not adequately address the above noted issues with the underlying basic problem that the current environmental document is a result of segmented projects all attempting a
uniform goal: saving two threatened and endangered fish species. You can not save species with such limited and segmented approach.
in this DEIR.) G_CAG-11

Sincerely,

Coast Action Group, Alan Levine, February 11, 2011

G_CAG-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_CAG-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project proposes a target elevation of 7 feet with a 9 foot maximum; the Reduced Project Alternative includes an 8 foot maximum. Under the Reduced Project Alternative (8 foot maximum water level), structures and beaches/property, would still be affected. As determined in the Draft EIR (Chapter 6.0, Alternatives Analysis, Section 6.7), the Reduced Project Alternative is identified as the environmentally superior alternative compared to the proposed project. It is not necessarily the "preferred alternative." For discussion regarding the consideration of an Alternative Flood Control Alternative, refer to **Master Response 2.5, Alternative Analysis**, in **Chapter 2, Master Responses.** Similarly, an Alternative Flood Control Alternative is presented and evaluated in Draft EIR Chapter 6.0, Alternatives Analysis.

G_CAG-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_CAG-4 For a discussion of the relationship, and cumulative effects to water quality, of the Estuary Management Project to the proposal to lower minimum instream flows as required by the Russian River Biological Opinion, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

G_CAG-5 Please refer to **Master Response 2.6 Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility** in **Chapter 2, Master Responses**, for discussion regarding Draft EIR consideration and analysis of potential impacts to recreation. Impacts related to recreation are also described in Draft EIR Section 4.7, Recreation.

G_CAG-6 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements** and **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

G_CAG-7 lease refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_CAG-8 Refer to response to comment G_CAG-2.

G_CAG-9 For a discussion of water quality, and analysis of best available data, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses.**

G_CAG-10 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

For additional discussion related to potential Estuary Management Project impacts to water quality, including effects of nutrients, bacteria, and secondary effects, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. With respect to the Estuary Management Project, water quality issues, including short-term impacts during outlet channel creation (Impact 4.3.1), impacts to salinity, dissolved oxygen, and temperature during the Lagoon Management Period (Impact 4.3.2), and effects of nutrient and bacteria levels during the lagoon management period (Impact 4.3.3), are disclosed in Draft EIR Section 4.3, Water Quality. The impacts are evaluated in accordance with criteria identified in the CEQA Guidelines Appendix G, which require analysis of violation of water quality standards, alteration of drainage such that increased siltation or sedimentation occurs, or creation of additional pollutant sources. For a discussion regarding the invasive aquatic plant species, *Ludwigia*, refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**, for a discussion of potential secondary biological effects related to water quality impacts.

G_CAG-11 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

Richard Charter
Senior Policy Advisor, Marine Programs
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main 707.875.2345 | 707.875.3482 | fax 707.875.2947
rcharter@defenders.org | waterway@monitor.net
www.defenders.org

February 12, 2011

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Subject: DEIR Comments

Submitted by email: estuaryproject@eassoc.com
and Jessica.Martini.Lamb@scwa.ca.gov

Dear Ms. Martini-Lamb:

Thank you for this opportunity to present comments on behalf of Defenders of Wildlife on the proposed Estuary Project and the accompanying Draft Environmental Impact Report (DEIR). Representing our over 145,000 members and activists in California and over one million nationwide, we request that a science-based process based on the precautionary principle be pursued before elements of the proposed project are implemented in the real world.

The DEIR fails to consider lessons learned from past attempts to "re-engineer" the mouth of the Russian River and the Lower River, involving major construction projects that repeatedly failed. Past failures, as well as previous unsuccessfully-managed flow regime modifications to the River itself, dictate that the utmost care be taken before proceeding with yet another engineering "solution" for this critical ecosystem component. G_DOW-1

Defenders would like to raise a range of concerns about the Estuary Project DEIR, having primarily to do with water quality, flows, project description, and shortcomings in the administrative and decision-making procedures for the Project. G_DOW-2

The Project Description leaves the long-term viability of the project unclear, but admits that the proposed modifications to the environmental setting and river flow should be considered an experiment, at best. G_DOW-3 The DEIR fails to address potential harm to upstream habitats, wildlife, and impacts to fish, beyond one species (Steelhead). G_DOW-4

The geographic scope of the proposed Project as described is inadequate, extending its analysis upstream only to Duncans Mills. G_DOW-5

The referenced "Temporary Urgency Change Petitions & Orders" would apparently have no California Environmental Quality Act (CEQA) review (or mitigations), and there would appear to be no CEQA review for the lower reaches of the River between Forestville and Duncans Mills, in spite of a recommendation from the National Marine Fisheries Service (NMFS) that it be included. G_DOW-6 The DEIR references unrelated estuary studies for other rivers with different circumstances, rivers which are generally smaller and surrounded by substantially less urban development. G_DOW-7

The DEIR fails to adequately address the new marine protected area near the Russian River mouth recently put in place under the State's Marine Life Protection Act (MLPA). G_DOW-8

The DEIR fails to make it clear how minimum flows will be maintained in wet years. G_DOW-9

The DEIR fails to adequately address the impact of the Project on recreation and the local economy. G_DOW-10

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1130 17th Street, N.W.
Washington, D.C. 20036-4604
tel 202.682.9400 | fax 202.682.1331

There is inadequate review of Special Status Species undertaken in the DEIR. G_DOW-11

The DEIR contains inadequate delineation and assessment of the anticipated impacts of altered water levels on Penny Island. G_DOW-12

There has been inadequate monitoring of bacteria and nutrients in the Estuary and the Lower Russian River, and the existence of undefined "natural" conditions is used by the DEIR as a flawed rationalization to avoid mitigations for the Project. G_DOW-13

The DEIR fails to evaluate the implications of biomagnification and cumulative impacts for toxic compounds. G_DOW-14

While the DEIR concludes that there are problems with excess nutrient levels within the Project area, it fails to provide adequate evaluation or mitigation for these excess nutrients. G_DOW-15

The DEIR fails to adequately consider pathogen impairments and their link to rainfall events. G_DOW-16

The DEIR fails to properly consider and evaluate long-term impacts on species other than Steelhead, and fails to evaluate biological diversity, including wildlife such as birds and mammals and the 47 other fish species in the Russian River Estuary. G_DOW-17

The DEIR fails to adequately consider Project impacts on pinnipeds, including Harbor seals, northern elephant seals, and California sea lions, nor does the DEIR adequately address the potential loss of the important Harbor seal haul-out at Jenner, the largest in Sonoma County, and other nearby haulout areas associated with the Estuary, and fails to assess the probability that the cumulative impacts of eighteen possible maintenance activities, each lasting up to two days, could be anticipated to disturb and disrupt seals and their pupping activities. G_DOW-18

Neither the Project's Notice of Intent (NOI) nor the DEIR adequately address the probable environmental effects of the Project pursuant to CEQA Guidelines Section 15082(C). G_DOW-19

Thank you for your attention, and for your commitment to this process. Please acknowledge receipt of these comments via reply email to waterway@monitor.net. G_DOW-20

Sincerely,

Richard A Charter

Richard A. Charter
Senior Policy Advisor, Marine Programs
Defenders of Wildlife

Defenders of Wildlife, Richard Charter, February 12, 2011

G_DOW-1 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion.

G_DOW-2 Draft EIR Section 4.3, Water Quality, includes an analysis, based on evaluation of CEQA criteria, of potential water quality impacts. Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**. The project description, presented in Draft EIR Chapter 2.0, was prepared in accordance with CEQA Guidelines Section 15124, and includes project objectives, location and map information, and technical and environmental characteristics, and intended use of the EIR. For additional discussion about the content provided in the project description, refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**. The comment does not clearly state what administrative and decision-making processes are deficient. In reviewing the preparation of the Draft EIR with CEQA Guidelines Section 21003, Environmental Review Procedures and Administration of Process, the Draft EIR is organized and written in a manner that will be meaningful and useful to decision makers and to the public, and emphasizes feasible mitigation measures and feasible alternatives to projects. With regard to decision-making procedures, Draft EIR Chapter 1.0, Introduction identifies the intended use of the document by the Water Agency Board of Supervisors.

G_DOW-3 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion related to the principles of adaptive management. The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion. The Biological Opinion contains clear timeframes for implementation and re-evaluation of the project over the period covered in the Biological Opinion, through 2023.

G_DOW-4 The Draft EIR addressed potential impacts to habitats and wildlife in Section 4.4, Biological Resources, and to fish in Section 4.5, Fisheries. Draft EIR Section 4.5 includes analysis of other non-Endangered Species Act-protected aquatic species, including common fish species and macro invertebrates.

G_DOW-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2 Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

G_DOW-6 The Temporary Urgency Change Petitions (TUCP) are not proposed as part of the Estuary Management Project and are not included in the project's environmental analysis. The potential for the Estuary Management Project to contribute cumulatively to impacts related to Temporary Urgency Change Petitions are considered in a cumulative analysis (Draft EIR, Chapter 5.0, Cumulative Analysis) and includes information on the CEQA analysis for the TUCP.

The comment is incorrect in the assertion that the NMFS scoping letter, dated June 22, 2010, argues that the Estuary Management Project should consider flow changes in the same EIR. Instead, the NMFS scoping letter states:

> "The Russian River BO directs SCWA to pursue Temporary Urgency Changes (TUC) to D-1610 to reduce summer inflow prior to a final change in D-1610 that will be supported by a separate EIR and water rights regulatory process, which we [NMFS] anticipate will be completed sometime between 2014 and 2016."

The Russian River Biological Opinion and NMFS scoping letter recognize that flow changes would be analyzed in a separate CEQA process. Both changes to flow under Decision 1610 and the TUCs are included in the cumulative analysis in Draft EIR Chapter 5.0. This analysis considers the potential impacts of the Estuary Management Project in conjunction with the anticipated effects of reducing minimum instream flows. The TUCPs result from a separate requirement of the Russian River Biological Opinion and have been found by the SWRCB to be exempt from CEQA.

G_DOW-7 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Reponses**, for a discussion on management of other river and lagoon systems in California. The Draft EIR includes the Russian River Biological Opinion by reference; the other estuary studies and examples are presented in research as part of the Biological Opinion.

G_DOW-8 Refer to response to comment S_CDFG-4 for a discussion regarding the Marine Life Protection Act.

G_DOW-9 The Estuary Management Project does not include management of flows during wet years. Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_DOW-10 The Draft EIR analyzed the potential effects to recreation and recreational resources in accordance with CEQA Guidelines Appendix G criteria in Draft EIR Section 4.7, Recreation. For additional discussion related to the Draft EIR analysis of potential recreational impacts, and CEQA requirements for socioeconomic effects, please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

G_DOW-11 All special-status species potentially present in the Estuary Study Area and maximum backwater area are addressed in Draft EIR Section 4.4, Biological Resources. The Draft EIR evaluates the types and conditions of the habitats present on the project site to determine their potential to support candidate, sensitive, or special-status species (herein collectively referred to as sensitive species) and to assess potential impacts resulting from the project to these species. This comment does not identify a specific inadequacy in the Draft EIR.

The potential impacts to special-status plant and animal species from the creation and maintenance of the lagoon outlet channel were addressed in Impact 4.4.1. This discussion included an assessment on the potential impacts to special-status species that may occur within the outlet channel management area and access route or directly adjacent to these sites. Special-status species addressed in this impact included Tidestrom's lupine, Myrtle's silverspot butterfly, nesting birds, and pinnipeds, among others. The potential impacts to special-status plant and animal species from the long-term adaptive management of the Estuary were addressed in Impact 4.4.7. This discussion included an assessment on the potential impacts to special-status species with a moderate to high potential to occur within the Estuary Study Area and those species that are primarily associated with freshwater marsh and riparian habitats, and open water habitat and beaches, gravel bars, and mudflats. Special-status species addressed in this impact included, but were not limited to, bristly sedge, deceiving sedge, California freshwater shrimp, foothill yellow-legged frog, California red-legged frog, western pond turtle, northern harrier, and great blue heron.

G_DOW-12 The Draft EIR contains a delineation and assessment of the altered water levels on Penny Island. Delineation of elevation contours shown on the Draft EIR Figure 3-4 series are based on bathymetric and topographic survey (EDS, 2009) of the Estuary study area, including Penny Island, and represent the best available information. The water surface elevations, shown at 4.5, 7.0, 9.0, and 14.0 feet, are developed based on water levels recorded at the Jenner gage located across the river from Penny Island. Potential impacts associated with the increased inundation for a longer duration are characterized in Section 4.4, Biological Resources, Impact 4.4.6, which addresses potential impacts associated with the Estuary Management Plan on sensitive natural communities. Draft EIR Figures 4.4-1 through 4.4-5 show the mapped communities with their approximate existing elevations, including Penny Island. The extent of inundation of each community within the marked elevations was determined based on this map series. Although lagoon adaptive management would increase the duration of inundation associated with perched freshwater lagoon conditions, the exact length and extent of inundation cannot be predicted with certainty, as it would depend upon barrier beach formation and outlet channel performance. The Draft EIR assumes that a water surface elevation of up to 9 feet for periods of one to five months represents a frequency, duration and depth that would be

experienced under the proposed project, and that this assumption provides a way to estimate the impacts to vegetation communities.

As described in the Draft EIR, Section 4.4, Biological Resources, Coastal and Valley Freshwater Marsh (CVFM) is the only CDFG sensitive natural community mapped within the Estuary Study Area that could be adversely affected by changes in surface water elevation, duration of inundation, or water quality parameters (e.g., salinity, dissolved oxygen, temperature). Northern Foredune Scrub, a CDFG Sensitive Natural Community, would not be substantially affected by the proposed project. As noted in this discussion, although conversion would be subject to several factors, this potential conversion would likely occur throughout the estuary, and may result in an increased distribution of CVFM. As noted in CDFG comments on the Draft EIR, CDFG agrees with the Draft EIR's findings that changes in vegetation assemblages would likely result in increases in sensitive Coastal and Valley Freshwater Marsh habitat, and that these vegetation distribution changes would be beneficial from a habitat perspective.

G_DOW-13 For a discussion of Draft EIR's characterization of existing water quality conditions, including nutrients and bacteria, in the Estuary and impacts analyzed in the Draft EIR, refer to Draft EIR Chapter 3.0, Project Background and Environmental Setting, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of adequacy of the EIR analysis, refer to **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**.

G_DOW-14 Biomagnification is the result of the process of bioaccumulation and biotransfer by which tissue concentrations of chemicals in organisms at one trophic level exceed tissue concentrations in organisms at the next lower trophic level in a food chain. The Estuary Management Project would not create or contribute to new or more severe sources of pollution; additionally, the Water Agency does not have the authority to control input from other dischargers. Cumulative impacts related to water quality are evaluated in Draft EIR, Chapter 5.0, Cumulative Analysis. The comment does not specify the toxic compounds that are of concern, nor how they may be related to the proposed project.

G_DOW-15 Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** regarding nutrient levels within the project area. Please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**, for a discussion on mitigation and monitoring requirements for nutrients.

G_DOW-16 Draft EIR Section 4.3, Water Quality includes a discussion regarding pathogens. The correlation of pathogens to rainfall events is not specifically addressed by the comment, nor is it specified how such a correlation may be related to the proposed project, and is not required in the context of this project. Refer to

Master Response 2.4, Water Quality, in **Chapter 2, Master Responses** for additional discussion regarding the Draft EIR analysis of nutrients.

G_DOW-17 In accordance with Appendix G of the CEQA Guidelines, a proposed project would have a significant impact related to wildlife species if it would "[h]ave a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, polices, or regulations, or by CDFG or USFWS." The Draft EIR includes this guideline in the criteria used to determine the significance of a potential impact in Section 4.4, Biological Resources. The Draft EIR does not specifically analyze diversity, but it does evaluate the types and conditions of the habitats present on the project site to determine their potential to support candidate, sensitive, or special-status species (herein collectively referred to as sensitive species) and to assess potential impacts resulting from the project to these species. Refer to response to comment G_DOW-11 above, for long-term impacts to special-status plant and animal species.

G_DOW-18 The Draft EIR Section 4.4, Biological Resources, evaluated the potential impacts on pinnipeds occupying the beach haulout site. For this assessment, refer to Impact 4.4.1, Special-Status Plant and Animal Species, Marine Mammals, on page 4.4-69. Additionally, the Draft EIR evaluated the potential impacts on pinnipeds occupying the beach haulout site, as well as haulouts located within the mainstem of the Russian River Estuary. For this assessment, please refer to Impact 4.4.8, Protected Marine Mammals, on page 4.4-79. Potential impacts to nursery sites, which includes harbor seal pupping, is included in Impact 4.4.10, Wildlife Movement and Nursery Sites, on page 4.4-83. The Draft EIR considered the Marine Mammal Protection Act Incidental Harassment Authorization (IHA), issued by NMFS, the agency with the responsibility of marine mammal species protection, and its provisions were consequently adopted as mitigation.

G_DOW-19 A Notice of Intent (NOI) was not prepared for the Estuary Management Project because it is not subject to the National Environmental Policy Act (NEPA). A Notice of Preparation (NOP) was prepared pursuant to CEQA Guidelines Section 15082(a) and included the description and location of the project and a list of probable environmental effects. The intent of scoping is to solicit input regarding the scope of EIR analysis. The comment also asserts that the Draft EIR does not address the probable environmental effects of the project in accordance with CEQA Guidelines Section 15082(c), Meetings. This excerpt and the method in which the Water Agency complied are presented in the table below.

CEQA Guidelines Section 15082(c), Meetings	Water Agency Compliance Methodology
In order to expedite the consultation, the lead agency, a responsible agency, a trustee agency, the Office of Planning and Research or a project applicant may request one or more meetings between	During an additional scoping meetings (staff meetings) on June 15, 2010, and September 13, 2010, the Water Agency requested participation from regulatory agencies with jurisdiction over the project area or resources during a

CEQA Guidelines Section 15082(c), Meetings	Water Agency Compliance Methodology
representatives of the agencies involved to assist the lead agency in determining the scope and content of the environmental information that the responsible or trustee agency may require. Such meetings shall be convened by the lead agency as soon as possible, but no later than 30 days after the meetings were requested. On request, the Office of Planning and Research will assist in convening meetings that involve state agencies.	scoping meeting to solicit their comments and input on the scope of the EIR. Invitees included members NMFS, USACE, CDFG, California Department of Parks and Recreation, NCRWQCB, California Coastal Commission, and California State Lands Commission. The meeting was not attended by representatives from the latter two agencies.
For projects of statewide, regional or areawide significance pursuant to Section 15206, the lead agency shall conduct at least one scoping meeting. A scoping meeting held pursuant to the National Environmental Policy Act, 42 USC 4321 et seq. (NEPA) in the city or county within which the project is located satisfies this requirement if the lead agency meets the notice requirements of subsection (c)(2) below.	The Water Agency held two scoping meetings in the city and county of the project area: Wednesday May 19, 2010 Community Meeting, Summary of 2010 Estuary activities:6:30 p.m. – 7:30 p.m. Open House Scoping Meeting: 7:30 p.m. – 9:00 p.m. Jenner Community Center, 10398 Highway 1 Jenner CA 95450 Thursday May 20, 2010 6:30 p.m. – 8:30 p.m. Sonoma County Permit and Resource Management Department Meeting Room, 2550 Ventura Avenue Santa Rosa, CA 95403
(2) The lead agency shall provide notice of the scoping meeting to all of the following: (A) any county or city that borders on a county or city within which the project is located, unless otherwise designated annually by agreement between the lead agency and the county or city; (B) any responsible agency (C) any public agency that has jurisdiction by law with respect to the project; (D) any organization or individual who has filed a written request for the notice.	Hard copies of the NOP and postcards summarizing the notice and pertinent meetings dates, times, and locations were circulated on May 7, 2010. The NOP was mailed to the State Clearinghouse, and was posted to the Water Agency website. The NOP was directly mailed to 431 parties, and a postcard notification of the NOP's availability was sent to 1,231 parties. The distribution list was developed based on the SCWA databases of regulatory agencies with jurisdiction, local organizations, business, and interest groups, and property owners based on parcels data. Hard copies of the NOP were mailed directly to federal, state, and local agencies with jurisdiction; members of organizations, business, and interest groups that requested a copy; and property owners with postal zip codes within Jenner, Duncans Mills, Monte Rio, Ville Grande, Rio Nido, Camp Meeker, Forestville, Occidental, Bodega Bay, and some in the Dry Creek area. Postcards were mailed to parties that have previously expressed interest in the RRIFR Program, including other local agencies, other interest groups and organizations, and a subset of Sonoma County residents and property owners (outside of the locations listed above). A full copy of the NOP hard copy distribution list is provided in **Appendix 1** of the Final EIR.
(3) A lead agency shall call at least one scoping meeting for a proposed project that may affect highways or other facilities under the jurisdiction of the Department of Transportation if the meeting is requested by the Department. The lead agency shall call the scoping meeting as soon as possible but not later than 30 days after receiving the request from the Department of Transportation.	No meeting was requested by the Department of Transportation. The Department received the NOP and Notice of Availability of the Draft EIR.

G_DOW-20 Comment acknowledged. Receipt acknowledged via email on February 22, 2011.

Megan Steer

From: David Keller [dkeller@eelriver.org]
Sent: Monday, February 14, 2011 4:07 PM
To: estuaryproject
Cc: Grant Davis
Subject: Russian River Estuary Management Project DEIR: Comments
Attachments: FOER Comments-NOP D-1610FishHabitatFlowWaterRightsEIR 11_12_10.pdf; FOER comments on Estuary Management flood levels, July 2010.doc

FROM:
David Keller, Bay Area Director
Friends of the Eel River
1327 I St.
Petaluma, CA 94952
(707) 763-9336
dkeller@eelriver.org
Feb. 14, 2011

TO:
Sonoma County Water Agency
Attention: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA, 95403
By Email: estuaryproject@esassoc.com
CC: Grant Davis, SCWA General Manager

Comments on the Russian River Estuary Management Project DEIR

Friends of the Eel River wishes to submit these focused comments on the proposals and alternatives for the Russian River Estuary Management Project DEIR ("Estuary Project").

1. Segmentation of Estuary Project from Fish Habitat Flow and Water Rights Project (revisions to D.1610) and other components of the Russian River Biological Opinion.

Revisions to the State Water Resources Control Board's D.1610, which sets minimum flow requirements for the Russian River, and which must be altered to comply with the Russian River Biological Opinion, were noticed for public comment in an NOP for the SCWA's Fish Habitat Flow and Water Rights Project. Such changes in Estuary management and Russian River flows, including proposed changes to flows released through Dry Creek from Lake Sonoma, as well as potential increased storage or release changes from Lake Mendocino, are integrally related to any changes in flow regime and management options for the Estuary Project. G_FOER-1

The Estuary Project DEIR cannot be considered separately from the rest of the requirements and recommendations of the Russian River Biological Opinion, and must be considered as a singular project. It may not be segmented into its component parts as is done in the Estuary Project DEIR and the Fish Habitat Flow and Water Rights Project. The DEIR must be revised and recirculated to account for all G_FOER-2

parts of the requirements of the Biological Opinion, which was not reviewed under CEQA or NEPA as an entire project. G_FOER-2 cont.

Please include as relevant comments prior comments submitted for the Fish Habitat Flow and Water Rights Project NOP (D.1610) on behalf of Friends of the Eel River, Nov. 12, 2010, attached. G_FOER-3

2. Dependence on Eel River diversions to the Russian River for flow management not disclosed or discussed.

The inflows to the Russian River from the Eel River, through PG&E's Potter Valley Project ("PVP"), have been instrumental over the past 100 years in establishing, managing, supplementing and maintaining flows in the main stem of the Russian River. As such, they are also instrumental in establishing flows, water levels, water quality and fisheries habitat in the Russian River, including the Estuary. The diversions and transfer of water at the PVP has significant and adverse impacts on the Eel River and the three listed species of salmonids native to the Eel River (Chinook, Coho and Steelhead). The Estuary Project DEIR fails to disclose the Estuary Project's relationship to and dependence on Eel River inflows to the Eel River, and must be corrected to account for the water and timings and impacts of these inflows on both Rivers. G_FOER-4

3. The Estuary Project EIR must consider impacts of continued diversions of water from the Eel River and possible cessation of the diversions.

The DEIR must provide an alternative of flows and water quality and flood level management that do *not* include inflows from the Eel River included in any modeling, and include reasonably foreseeable changes in flows from the Eel River, including changes in the FERC licensing requirements for the PVP. *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th. We have described such an alternative approach and the rationale for it in more detail in the attached letter, FOER comments on NOP, Nov. 12, 2010. G_FOER-5

4. Management of flood levels at the Estuary must include an alternative of removal of the affected low-lying structures, rather than maintaining flood levels to protect the structures.

The management of flood levels at the Estuary appear to be limited by managing for flood protection of some 6-8 low-lying structures, rather than primarily focused on improving fisheries and wildlife habitat, and water quality and flows at the Estuary. G_FOER-6

The "Galloway Report," issued to address changes in federal floodplain management policies following the Great Floods of 1993, Interagency Floodplain Management Review Committee [US Army Corps of Engineers], Sharing the Challenge: Floodplain Management into the 21st Century, 1994, broadly recommended that floodplain management policy reflect three priorities:
- avoid building in floodplains
- provide protection for structures which are water dependent or are critical infrastructure.
- remove other structures from the floodplain to lessen the risks and costs of future, repetitive flood protection schemes, repairs, replacement and loss of life.

Here, the structures being offered protection as part of the Estuary Project alternatives are not water dependent, nor are they critical infrastructure. An alternative must be developed which either removes these structures, elevates them above base flood elevations, or otherwise protects them from flood G_FOER-7

impacts without designing the Estuary flood elevations around their protection. G_FOER-7 cont.

I have included e-correspondence with SCWA and NOAA, from July 2010, attached, discussing these issues and problems. G_FOER-8

Thank you for the opportunity to provide comments on the Estuary Project DEIR. Please include FOER on the list for notification of any and all future activities related to the Estuary Project.

Sincerely,

David Keller
Bay Area Director
Friends of the Eel River

www.eelriver.org
"How would you manage the Russian River for sustainable water supply and fisheries restoration without any Eel River inflows?"

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ELLISON FOLK
Attorney
folk@smwlaw.com

November 12, 2010

Via U.S. Mail & Electronic Transmission

Jessica Martini-Lamb
Principal Environmental Specialist
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

This letter is submitted on behalf of the Friends of the Eel River ("FOER") and comments on the Notice of Preparation ("NOP") of an environmental impact report ("EIR") on the Sonoma County Water Agency's Fish Habitat Flow and Water Rights Project ("the Project.")

The purpose of an NOP is to "solicit guidance from [responsible and other] agencies as to the scope and content of the environmental information to be included in the EIR." CEQA Guidelines § 15375; see also CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable information regarding the nature of the project and its probable environmental impacts, in sufficient detail to enable a meaningful response. CEQA Guidelines § 15082(a)(1)(A)-(C). CEQA requires responsible and trustee agencies to respond "with specific detail about the scope and content of the environmental information . . . that must be included in the draft EIR." CEQA Guidelines § 15082(b). In particular, such agencies must identify particular environmental impacts, alternatives, and mitigation measures for analysis in the EIR. CEQA Guidelines § 15082(b)(1)(A).

The ability of responsible and trustee agencies to comply with this requirement, however, depends entirely on the adequacy of the information provided in the NOP. As the following discussion illustrates, the NOP should provide additional information about the proposed project, alternatives, and potential environmental impacts so that the public and trustee agencies can more fully understand and respond to the NOP.

Comment Letter G_FOER
Attachment 1

Project Description and Environmental Setting

Under CEQA, an EIR must describe the project's precise location, boundaries, objectives, and technical, economic, and environmental characteristics. See CEQA Guidelines § 15124(a)-(c). Here, the NOP indicates that the EIR will evaluate the impacts of changes in flow in the Russian River mandated by the 2008 Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance issued by the National Marine Fisheries Service. (NOP at 4.) Although the NOP specifies the new flow levels that will be sought for the protection of Coho salmon and steelhead trout, it is vague in its description of at least two other elements of the Project: (1) unspecified changes in instream flow requirements for chinook salmon and (2) unspecified changes in water rights permits.

The NOP should clarify the proposed changes that SCWA will seek in connection with these elements of the Project. In particular, the water rights permits that will be affected and the changes sought should be included in the Project Description. SCWA should also clarify now whether it intends to seek any right to use water from the Eel River as part of this Project.

In addition, the EIR should carefully consider the existing environmental setting and regulatory environment affecting the Project. In this context, the EIR should contain a full discussion of existing water rights on the Russian River, diversions, pumping and storage from the River (both legal and illegal). This information will be critical to a full discussion of how reductions in flows will affect actual conditions in the River and will enable the public and decision makers to determine whether reductions in flows will create the incentive for more consumptive use of Russian River water.

Reasonably foreseeable future projects and actions should also be taken into account in the EIR. Although the Project is designed in part to respond to changes in flows from the Eel River as a result of the 2004 license amendment, those flows are likely to change again in the future as the new relicensing process begins. Possible change to flows from the Eel River should be addressed in this EIR. *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 870-71. Indeed, in view the intention to request changes in the hydrologic index to reflect conditions in the Russian River rather than the Eel River watershed, the EIR should include a scenario in which no flows from the Eel River are diverted to the Russian River. This information would best reflect the decision to change the hydrologic index and would provide crucial information about alternative ways to achieve the Project's low flow goals.

Environmental Impacts

The NOP recites in general terms the areas of environmental impact that will be reviewed in the EIR. FOER requests that the EIR provide a detailed analysis of all of the potentially significant environmental impacts of the Project and all feasible mitigation measures. In determining whether particular impacts are significant, the Agency must look to CEQA Guidelines section 15064. In order for the EIR to serve its purpose as an informational document, it is essential that the EIR not understate the severity or extent of the impacts associated with the proposed Project.

To provide an accurate view of the impacts of this proposed project, the EIR should, at a minimum, evaluate:

- Impacts to Lake Mendocino caused by reductions in flows to the Russian River and whether Lake Mendocino can store additional water not released to the Russian River.
- Impacts associated with additional releases to the Russian River in the event Lake Mendocino is not able to store additional water, such as those releases that occurred between October 8 and October 15, 2010.
- Impacts identified in the attached letter from Kamman Hydrology & Engineering.

G_FOER-5

The SCWA must also use reasonable efforts to discover, disclose, and discuss past, present and future projects including those under review by other agencies. Discussion following CEQA Guidelines § 15130. As one court put it:

> [T]he full environmental impacts of a . . . proposed action cannot be gauged in a vacuum . . . [or treated] as an isolated "single shot" venture . . . in the face of persuasive evidence that it is but one of several [environmental threats]. To ignore the prospective cumulative harm under such circumstances could be to risk ecological disaster.

Whitman v. Board of Supervisors (1979) 88 Cal.App.3d 397, 408.

Thus, the draft EIR should evaluate the cumulative impacts resulting from implementation of the Project and other future actions including:

- Reductions or changes in flows in the Russian River mainstem and tributaries during critical spring flow conditions due to frost control

pumping regulations now being considered by Sonoma County and the State Water Resources Control Board;

- Changes in flows that may result from AB 2121;
- Impacts associated with the amendments to the Vineyard Erosion & Sediment Control Ordinance, scheduled for adoption by the Board of Supervisors in December 2010;
- Changes in estuary management being considered by NMFS and SCWA;
- Dry Creek reconstruction, which will limit water diversions by SCWA until new fish habitat or a pipeline is successfully constructed;
- Potential increase in storage capacity in Lake Mendocino, including a proposed increase in dam height and/or sediment removal;
- Potential reduction in PVP inflows to E. Branch Russian River due to tunnel collapse or system malfunctions; and
- Additional and continued gravel mining in the Russian River.

Alternatives

An EIR must analyze a reasonable range of feasible alternatives that would lessen the environmental impacts of the proposed project. See CEQA Guidelines § 15126.6(a). This discussion must include analysis of alternative project designs and locations capable of avoiding significant impacts, even if those alternatives would be more costly or would impede the project's objectives to some degree. CEQA Guidelines § 15126.6(b). Information about alternatives in the EIR should be sufficiently detailed to enable "meaningful evaluation, analysis, and comparison with the proposed project," CEQA Guidelines § 15126.6(d), and must include discussion of a "no action" alternative. CEQA Guidelines § 15126.6(e).

At a minimum, the EIR should evaluate an alternative that does not rely on any diversions from the Eel River. This alternative would reflect the decision as part of this Project to seek a change in the hydrologic index from the Eel River to the Russian River watershed. Moreover, this alternative would facilitate a consideration of the extent to which the proposed reductions in flows will create an incentive to maintain and/or increase reliance on Eel River water in view of reduced flows in the Russian River.

In addition, the EIR should evaluate whether reductions in flows from the Eel River would make it possible to meet the minimum flow requirements of the Project. For example, the EIR could evaluate an alternative in which only the minimum flows to the Russian River specified in PG&E's 2004 license to operate the Potter Valley Project are diverted to the Russian River. Such an alternative could avoid potential impacts to Lake Mendocino (caused by the need for additional storage) as well as potential impacts to the Russian River that result when water is released from Lake Mendocino increase storage capacity, as recently occurred.

Preparation of a Joint Environmental Impact Report/Environmental Impact Statement:

If the Project will receive federal funding or involve federal permits or approvals, including changes in storage or releases by USACE at Lake Mendocino or Lake Sonoma, SCWA should prepare a joint EIR/EIS in cooperation with any federal agency that will be providing major support for the action.

Conclusion

We appreciate the opportunity to comment on the NOP. We also submit with these comments the comments of Kamman and Associates, and we request that these comments be considered by the Agency. Inasmuch as the NOP contains only general information as to the Agency's approach to evaluating the project's potential environmental impacts, the issues identified in this letter are not intended to be exhaustive. FOER reserves its right to raise other issues during the environmental review process. Please send this firm a copy of the Draft EIR once it becomes available.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Ellison Folk

cc: Friends of Eel River

P:\FOER\Gen\ef026 draft NOP comments.doc

G_FOER-6

Comment Letter G_FOER
Attachment 1

MEMORANDUM

Kamman Hydrology & Engineering, Inc.
7 Mt. Lassen Drive, Suite B-250, San Rafael, CA 94903
Telephone: (415) 491-9600
Facsimile: (415) 680-1538
E-mail: Greg@KHE-Inc.com

Date: November 8, 2010

To: David Keller and Nadananda, FOER

From: Greg Kamman

Subject: Review of Sonoma County Water Agency NOP (issued 9/29/10)
Fish Habitat Flow and Water Rights Project

Per the request of FOER, I've completed a review of Sonoma County Water Agency's Notice of Preparation (NOP) of Environmental Impact Report for the "Fish Habitat Flows and Water Rights Project", issued September 29, 2010. Based on this review, I have developed the following questions, comments and critiques regarding the content of the NOP.

1. The proposed project description for the Fish Habitat Flow changes indicate that a stipulated minimum flow will be in effect during "each year" (bullets on page 8 and 9), implying the minimum flow requirements will be in effect during all year types. The table on page 6 concurs with this description for the listed dry and normal water year-types. However, Decision 1610 requirements provide a minimum flow schedule for normal, dry and critically dry year-types. At first, I simply assumed that NOP lumped the proposed flow change dry and critically dry year-types into the single "Dry year-type" category. However, after careful review of the BO and further consideration, it is not clear to me as to what flow schedule will apply during a critically dry year-type under the NMFS BO proposed changes. Neither the BO nor the NOP provide clarification as to what minimum flow requirement change, if any, occurs during a critically dry year-type. Again, the language in the NOP suggests the BO flow changes apply to "each year", while one interpretation of the BO may leave the original D. 1610 critically dry year-type minimum flow requirement in place. Therefore, the project description is misleading and/or inaccurate and needs clarification on this important issue.

2. If the NOP project description is interpreted to mean that the proposed minimum flow schedule is the same during all year-types within each of the river sections, the need for a water-year type classification methodology is moot – the minimum flow schedule will apply to all year-types. The NOP puts considerable emphasis on the need to revise the water-year type classification approach, suggesting that some project operations will be tied to water-year type classes. However, the only project operations indicated in the BO and NOP that are tied to a water year type classification is the required minimum flow release schedule. Perhaps there are other

water operations (e.g., reservoir storage curves or safety of dam criteria) that are tied to water year type classes. The only function of a year-type classification scheme that I see of at this time is to identify "critically dry" year-types from all other year-types, if this triggers a change in minimum flow requirements. Again, the project description falls short in clarifying this important water operation and river flow condition.

3. The project proposes to change the criteria for determining the Hydrologic Index. The NOP states (bottom of page 7), "It would be more realistic for the water-year type to be based on the Russian River watershed conditions rather than on Eel River watershed conditions." I have a number of concerns regarding this proposed change and feel the EIR will need to justify such a change and discuss why alternative methods aren't more rationale. My concerns include:

   a. If there is no change in minimum flow requirements between year-types, why is the Hydrologic Index needed? (See discussion under item 5. above).

   b. If the revised Hydrologic Index is to reflect Russian River conditions, why isn't the index tied to Lake Sonoma as well as Lake Mendocino? Surely an index reflecting their combined "condition" better reflects the Russian River as a whole than solely Lake Mendocino. Or, perhaps a broader array of river flow and/or precipitation records would better reflect the overall basin hydrologic condition including Lake Sonoma, the West Branch Russian River and all other principal tributaries. For example, the Bureau of Reclamation's Central Valley Project utilizes the Sacramento River Index as the basis for determining water year types[1] that drive water operation decisions.

   c. The majority of water deliveries to Lake Mendocino and, in turn, storage in Lake Mendocino are driven primarily by PVP diversions from the Eel River watershed. The amount of downstream releases to the Eel River (RPA flow schedules based on 2002 Eel River FERC BO) and PVP diversions are primarily determined by water year-type determinations based on the amount of annual inflow to and/or storage in Lake Pillsbury. The hydrologic conditions of Lake Mendocino are closely linked and controlled by the hydrologic conditions and water operations in the Eel River watershed. Therefore, determining the Hydrologic Index for the Russian River watershed based on the hydrologic conditions of Lake Mendocino is flawed, as water supply to Lake Mendocino is heavily driven and controlled by the upper Eel River watershed hydrologic index. Therefore, SCWA's Hydrologic

[1] The Sacramento River Index (SRI) refers to the sum of the unimpaired runoff in the water year as published in the DWR Bulletin 120 for the Sacramento River at Bed Bridge, Feather River inflow to Oroville, Yuba River at Smartville, and American River inflow to Folsom reservoir. SRI calculates unimpaired flow in million acre - feet from the representative stations and compares them to historical statistics to index water year types into Wet, Above Normal, Below Normal, Dry, and Critical. Year types trigger specified Delta outflow criteria and Sacramento system requirements. For example, the SRI is used to trigger relaxation criteria related to May - June Net Delta Outflow (NDO) requirements.

Index should consider alternative approaches that are truly representative of hydrologic conditions in the Russian River watershed.

   d. It is my experience that Hydrologic Indices and/or water year-type designations are based on unimpaired hydrologic conditions (e.g., Sacramento, San Joaquin and Colorado River Indices as defined in California's 2009 Water Plan update). Unimpaired runoff represents the natural water production of a river basin, unaltered by upstream diversions, storage, and export of water to or import of water from other basins. The responsible management and beneficial use of water relies on best satisfying demands with available supply. Absent large reservoirs with multiple years of carry-over storage, the best gauge of a watershed's annual available supply is based on an estimate or prediction of unimpaired inflow. The hydrologic conditions in Lake Mendocino are representative of altered streamflow diversions, often created, on occasions, under operational decisions unrelated to unimpaired flow conditions or natural water supply. Therefore, Lake Mendocino hydrologic conditions are not a reliable source for determination of water year-type designations for the Russian River watershed. The Fish Flow Project and associated EIR should identify and evaluate other methods and hydrologic conditions that are more representative of unimpaired hydrologic conditions in the Russian River watershed including Lake Sonoma storage and/or flows on all principal tributaries.

   e. There is the possibility that future FERC relicensing of the PVP and/or a new upper Eel River Biological Opinions will ceases diversions of Eel River water to Lake Mendocino, eliminating the usefulness of this structure as a gauge of either Russian or Eel River hydrologic conditions, at least as would be functional to the Russian River project. Infrastructure damage, maintenance and diversion tunnel collapse could also alter deliveries to Lake Mendocino, creating anomalies in lake levels and hydrologic conditions.

4. The NOP's project description provides no information on how the project will operate under critically dry year-types or during prolonged droughts, periods when there may be insufficient water available to meet the minimum flow requirements. This statement is predicated on the fact that the current (1986) Decision 1610 minimum flow requirements for the mainstem River during critically dry year-types (25 cfs between East Fork and Dry Creek and 35 cfs between Dry Creek and Ocean) are significantly lower than those stipulated in the NOP for "each year" (125 cfs between East Fork and Dry Creek and 70 cfs between Dry Creek and Ocean). The 1986 D.1610 flow schedules were developed through careful hydrologic modeling of water supply operations to balance available supply and demand. Those analyses and resulting minimum flow schedule yielded minimum flows for critically dry year-types that are two- to three-fold lower than the recommended BO flows – a notable inconsistency that leads me to question the feasibility of the proposed BO flow changes during dry and critically dry year-types.

5. The BO and D. 1610 indicate that in order to meet current minimum flow standards through the entire designated river reaches, excess water is typically discharged in order account for summer losses (legal and illegal diversions, evapotranspiration, groundwater infiltration and recharge, etc.). For example, the BO states that during some spring and summer months, SCWA releases 250-300 cfs from CVD to maintain a flow of 185-cfs at Healdsburg (see page 226 of BO). As part of the project description, it would seem prudent to better predict and present the likely flow releases that will be made below CVD and WSD in order to meet the low flow criteria. These actual release rates and associated water quality will provide much more insight into the potential benefits and impacts associated with the project than simply assuming a single minimum flow criteria value is occurring through all River reaches at any given time. Estimating representative release rates will require developing and analyzing a complete water budget for the entire river corridor.

6. The SCWA is attempting (through anticipated water-right petition) to extend the duration of minimum flows beyond the period stipulated in the BO, possibly year-round. Such changes will enable SCWA and/or project operators to substantially control seasonal flow patterns, geomorphic and ecological conditions and variability within the Russian River watershed, especially if Lake Mendocino storage is increased. This raises a number of concerns, including the following.

    a. A meaningful and definitive description of this action and potential impacts to the environment are not included in the NOP.

    b. Extending SCWA's ability to maintain the minimum flow schedule later into the year could allow them to capture and retain fall and early winter runoff in reservoirs in lieu of allowing the natural flow increases associated with early season storm runoff.

    c. This action will provide SCWA the power to manipulate the fall-early winter flow magnitudes and durations during an important time of fish immigration and spawning, potential changes and impacts that are espoused to be avoided in the BO and Decision 1610 by providing natural runoff and hydrologic conditions.

7. Based on the comments and questions presented in items 7. through 10. above, considerable technical assessments will be required as part of the EIR development process in order to evaluate if the proposed project changes will impart significant impacts to the environment. Analyses and impact assessments that will need to be implemented include, but are not limited to:

    a. Studies to determine if there is sufficient supply and carry-over storage to operate the project in a manner beneficial to watershed fisheries (as determined by flow depth, velocity and temperature) during: normal year types; dry year types; critically dry year types; and multi-year drought periods. Specifically, will there be sufficient storage in Lake Mendocino

to accommodate current PVP diversions and proposed summer flow reductions?

    b. If proposed minimum flow releases during critically dry years are higher than those expressed in Decision 1610, studies will need to evaluate if there is sufficient supply available to satisfy project operations during a single and back-to-back critically dry water year type.

    c. If the project Hydrologic Index based on Lake Mendocino storage and/or inflow via PVP diversions yields a water year type that differs from the true unimpaired flow conditions in the Russian River watershed, will the project meet desired goals and objectives? For example, what if the Lake Mendocino Hydrologic Index indicates a normal year type, but the inflow and/or storage to Sonoma Lake is representative of a dry or critically dry year type. How well will project goals and objectives be met? What if this water year type dichotomy between Lake Mendocino and Lake Sonoma occurs during successive years or on a high frequency? Analyses should also look at the hydrologic record and evaluate how the proposed project would have fared over long-term historic periods.

    d. There is the real possibility that future FERC relicensing of the PVP and/or a new upper Eel River Biological Opinions will eliminate diversions of Eel River water to Lake Mendocino. Therefore, this is a reasonable and prudent condition that should be considered when evaluating all project alternatives. The implications of losing such a large and important supply of water to the project would have profound impacts on Russian River project water supply that should be acknowledged and evaluated.

8. Although not addressed in the NOP, the evaluation of the project alternatives will require the development and/or use of defensible water operation, hydrologic, hydraulic, geomorphic and water quality impact assessment tools in the form of hydrodynamic, hydrologic and hydraulic numerical models that will undergo rigorous scrutiny and validation. Typically, water operation models can adequately simulate and address the necessary operational questions using coarse and simplified spatial and temporal (monthly) domains (e.g., US Army Corps HEC-ResSim). However, more detailed and accurate numerical models running on relatively short time-steps (hourly or daily) are necessary to capture the changes in flow rates, flow velocities, water levels, and water quality conditions (esp. temperature) used to evaluate benefits and impacts to aquatic and riparian species and their habitats – the coarser water operation models such as HEC-ResSim typically can not achieve this objective. Independent habitat assessment modeling is also commonly used on these types of investigations. In fact, in 2000, the Corps and NMFS recommended that additional field measurements and habitat simulation modeling be done to assist in development of the BO's RPA. As stated in the BO, "habitat modeling to address instream flow

needs for fishes is often accomplished using the Instream Flow Incremental Methodology (IFIM)". In 2001, the Corps and NMFS specifically recommended that the IFIM be used to address habitat flow relations in River segments affected by project water releases. However, the SCWA declined to use this highly quantitative method for addressing this issue. Instead, the 2001 Demonstration Flow Assessment study was completed and used to develop revised minimum flow requirements using, in my opinion, a very small set of empirical information representative of a narrow band of flow ranges. Given the importance of the technical approach and methods used to evaluate project impacts, it would be prudent for the NOP to provide information regarding the modeling analysis tools to be used, the suite of alternative water supply and operations being incorporated into the impact assessments, and the simulation year-types and wet and dry (drought) periods incorporated into the analysis. We also recommend, at a minimum, numerical models provide estimates of flow rates and velocities, water depths and water temperature while accounting for changes in reservoir and groundwater storage, diversions, infiltration and evaporative losses. We do not advocate any specific modeling code at this time, but feel the model selection process be described in the EIR along with specific modeling goals and objectives and the rationale for the specific model choice over other candidate model codes.

9. The NOP repeatedly states the project will, "update water rights permits to reflect current conditions" (e.g., twice on page 8 and once on page 9). What does this specifically mean? Why is this not described in sufficient detail so the reader of the NOP can make a judgment as to possible benefits or impacts to the environment?

10. The current condition and BO recommended management changes to the Russian River Estuary/Lagoon are based to a greater degree on analogies to other Central California coast lagoons than site specific water-level, water quality or barrier dynamics. Based on my own experiences and studies on other California Coastal estuary systems (e.g., Santa Clara River Estuary in Ventura, Ventura River Estuary, Pescadero Creek Estuary, Chrissie Marsh/Lagoon at San Francisco Presidio, Bolinas Lagoon, lower Lagunitas Creek, Gualala River Estuary and Eel River Estuary), I am concerned that reducing the flow rates (i.e., "provide a lower, closer-to-natural inflow to the estuary between late spring and early fall") will not be sufficient to maintain a "seasonal freshwater lagoon" of satisfactory water quality. The EIR will need to have a rigorous analysis regarding lagoon and barrier beach dynamics in response to flow changes and how the project will alter the frequency and duration of inlet opening/closing and seasonal effects on water quality, again, capturing hourly or daily changes in water level, flow velocity, water temperature, salinity and dissolved oxygen. This analysis will also require an assessment of off-shore wave energy, littoral drift, and sediment supply to characterize and predict seasonal barrier beach dynamics.

11. How will the project assess impacts to existing riparian vegetation? Does the SCWA project EIR need to address all eight of the elements (listed on page 241 of BO) consisting the BO RPA, including instream channel work, pipelines, etc.?

Comment Letter G_FOER
Attachment 1

12. The NOP project description should include a statement that the water resources within the entire Russian River watershed area (both surface and groundwater) may be impacted by the project and that the EIR will address such flow related changes and impacts, including:

    a. Changes in surface water diversions – assuming the opportunity to divert surface water would decrease in association with lower flows?

    b. Will the project cause decreases in surface water diversions, leading to increased groundwater withdrawals? If so, what will be the impact on local and regional groundwater levels and supply?

    c. Dry season groundwater infiltration and recharge from the River - how will reduced flows alter river infiltration and groundwater recharge and storage?

    d. How will River water quality be impacted considering a reduced volume of water available to dilute potential contaminants, especially water treatment and agricultural drainage returns to the river via surface and ground water?

    e. How will the changes in flow magnitudes alter water temperatures?

    f. How will the flow changes impact the existing riparian corridor and habitat to associated fish and wildlife species?

    g. If significant changes in the magnitude of winter high flows are proposed or possible, especially with SCWA petitioning to extend the period of the minimum flow requirements into October through December, how will these changes impact channel morphology especially with respect to area and usage of salmonid spawning habitat, fish passage, summer rearing of coho and steelhead and other aquatic species.

    h. The EIR should address the cumulative effects on surface and groundwater resources associated with proposed flow changes in terms of surface and groundwater interactions and water quality, including proposed treated effluent reuse projects, groundwater recharge projects, future anticipated urban and agricultural growth, gravel mining projects, and anticipated groundwater management plans.

E-mail discussion of management issues for Russian River Estuary Project, July 2010

-------- Original Message --------
Subject: Re: [Fwd: Re: Estuary outlet channel]
Date: Tue, 13 Jul 2010 06:31:10 -0700
From: John McKeon <John.McKeon@NOAA.GOV>
To: William Hearn <William.Hearn@NOAA.GOV>, dkeller@eelriver.org, Ann.DuBay@scwa.ca.gov, Grant.Davis@scwa.ca.gov, rrkeeper@sonic.net, rrwpc@comcast.net, Dick Butler <Dick.Butler@NOAA.GOV>, Chris Delaney <Chris.Delaney@scwa.ca.gov>

Mr. Keller,
Your input is appreciated and your points well taken. Many are discussed in the biological opinion. Your point of no engineering magic
is particularly appropriate considering the variety, magnitude and unpredictability of the forces at work seasonally building and sculpting
the beach and the river mouth, not to mention the anthropogenic influences on river flow and beach morphology. However unpredictable though, it is clear California river mouth beaches build in spring and through a process of, at times, multiple closures and re-establishment of outflow as the beaches build and widen, create elongated and elevated
outlet channels which raise estuary water surface elevations above high
tide (~3 ft NGVD), and allow for rapid conversion of the estuaries to highly productive oligohaline conditions. NMFS is actually pleased to see SCWA's changed breaching practices for the last year did allow for such a channel to form and for a conversion of the estuary to occur. The very limited action Thursday, though unsuccessful in maintaining outflow, was
intended by SCWA's engineering team to be conservative in not breaching and flushing the highly productive conditions created in the estuary. They were successful on that count... Unfortunately SCWA's permit with State Parks limits actions to Mon-Thurs, and the lagoon was somehow breached straight out on Sunday night, leaving the former naturally formed long and
elevated outlet channel high and dry. **As you aptly point out, and as evidenced by the failed jetty, and the unpredictable physical or cultural
processes of breaching, SCWA's ability to "manage" the beach is quite limited.
Thus adaptive management of the naturally formed outlet channel is only the immediate response
by SCWA to allow formation and maintenance of highly productive conditions in
the estuary, while continuing to carry out its responsibility to prevent flooding.**

Ms. DuBay can likely give you the best update on the progress of investigations and planning for other elements of the Reasonable and Prudent

Alternative prescribed in the Biological Opinion, some of which you mention.

Again, thanks for your comments. Please feel free to contact me directly with any
advice about beach processes or questions about adaptive management of the seasonally created outlet channel.

Sincerely,
John McKeon

William Hearn wrote:
> Please respond and cc others. Thanks.
> Bill
>
> -------- Original Message --------
> Subject: Re: Estuary outlet channel
> Date: Mon, 12 Jul 2010 13:26:41 -0700
> From: David Keller <dkeller@eelriver.org>
> To: Ann DuBay <Ann.DuBay@scwa.ca.gov>
> CC: 'dick.butler@noaa.gov' <Dick.Butler@noaa.gov>, William Hearn
> <William.Hearn@NOAA.GOV>, Grant Davis <Grant.Davis@scwa.ca.gov>, RR
> Keeper <rrkeeper@sonic.net>, 'Brenda Adelman' <rrwpc@comcast.net>
> References:
> <477A999895BC974581E856648DA3939E095207B1EC@FeMail.scwa.loc>
> <4C37AF28.7050101@eelriver.org>
> <477A999895BC974581E856648DA3939E095207B1FB@FeMail.scwa.loc>
>
>
>
> Thank you, Ann, for the followup note.
>
> My concern is that this is an expensive case of 'whistling dixie',
> with the inevitable serious changes delayed for at least another
> season. There is 'adaptive management', and there is also the
> inevitable running up against a clear, extremely likely, reality
> check. I have a great deal of respect for PWA, but I think this
> current exercise doesn't pass the sniff test.
>
> Bests,
> David
>
> Ann DuBay wrote:
>>
>> David,
>>
>> Thanks for the note. As always, I appreciate your insight. We're
>> lucky to have a good consulting team, with PWA, plus the advice of
>> John McKeon at NMFS (who has had success with this at Carmel).
Still,
>> it's called "adaptive" management for a reason!
>>
>> Ann
>>
>> Ann DuBay

>>
>> Sonoma County Water Agency
>>
>> 707.524.8378
>>
>> 707.322.8185
>>
>> www.sonomacountywater.org
>>
>> *From:* David Keller [mailto:dkeller@eelriver.org]
>> *Sent:* Friday, July 09, 2010 4:22 PM
>> *To:* Ann DuBay
>> *Cc:* Dick Butler; Bill Hearn; Grant Davis; RR Keeper; rrwpc-l
>> *Subject:* Re: Estuary outlet channel
>>
>> Ann -
>>
>> I'm sorry to hear about the most recent failure of Russian River
>> estuary water level management efforts to date.
>>
>> In my experience with managing the reconstruction of the historic
>> groin on the Bolinas Beach at the mouth of Bolinas Lagoon and
Channel
>> (1982-1986, following destruction in the 1982 storms), I'm
completely
>> unsurprised at this chain of events. Moving unconsolidated sand
>> around and hoping is stays in place is like building a sand castle
in
>> the surf. The number of hours it stands is barely predictable, and
it
>> is inevitable that it will be washed away. The SCWA efforts at the
>> beach are merely using bigger toys to build bigger sand castles.
>>
>> Attempting to balance the energy of the Russian River outflows from
>> the estuary to the ocean (which energy will diminish over time as
the
>> estuary level drops) against the vast energy of the swells coming in
>> on wave trains generated in the South Pacific's winter storms is at
>> best a very delicate balance. In addition, the impacts of aeolian
>> drift on sand movement and accumulation must be accounted for as
well.
>>
>> More likely, however, is that this channel-building work is
>> engineering magical thinking. It is expensive to SCWA and
frustrating
>> to residents, visitors and river users, and very likely disruptive
to
>> the seals and fish who inhabit this place.
>>
>> I think that the attempts to corral the Russian River's estuary into
>> controlled and limited depths to prevent flooding of a very few
>> properties is tilting at windmills. It's really time to cut to the
>> chase, and move on to letting the estuary close naturally, and with
>> it, moving, raising, floodproofing or abandoning those few
structures
>> that are currently being used to set maximum flood elevation levels.
>>

Comment Letter G_FOER
Attachment 2

>> With best wishes for restoration of a functioning and healthy
estuary
>> and fishery,
>>
>> Sincerely,
>>
>> David Keller
>> /Bay Area Director
>> Friends of the Eel River
>> 1327 I St.
>> Petaluma, CA 94952
>> dkeller@eelriver.org <mailto:dkeller@eelriver.org>
>> (707) 763-9336/
>>
>> ----
>> Ann DuBay wrote:
>>
>> All,
>>
>> On Thursday morning, the Sonoma County Water Agency successfully
>> created an outlet channel, which functioned as designed for most of
>> the day. But the river outflow at the channel could not overcome the
>> combined ocean forces of a high tide on Thursday evening and a 3-
foot
>> south ocean swell. The channel closed at approximately 7 p.m.
>>
>> Water Agency staff will be out to maintain the outlet channel on
>> Monday morning, July 12th . With the anticipated higher stages in
>> the estuary and the extreme low tides (-1.4 ft at 6:05 am) predicted
>> for Monday morning, the Water Agency is hopeful that the head
>> difference between the estuary and the ocean will result in channel
>> outflows great enough to counteract ocean forces and that the
channel
>> will remain open. Seal monitoring will be conducted prior, during
and
>> after the activities.
>>
>> Thank you!
>>
>> Ann DuBay
>>
>> Sonoma County Water Agency
>>
>> 707.524.8378
>>
>> 707.322.8185
>>
>> www.sonomacountywater.org <http://www.sonomacountywater.org>
>>

Friends of the Eel River, David Keller, February 14, 2011

G_FOER-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_FOER-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project and the CEQA requirements that would trigger reirculation, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.9, Recirculation**, in **Chapter 2, Master Responses**.

G_FOER-3 Scoping comments submitted by Friends of the Eel River for the Notice of Preparation for the Fish Habitat Flows and Water Rights Project on November 12, 2010, that were attached to the comment letter on the Estuary Management Project Draft EIR, are included in the record, but are not addressed in this Final EIR because these comments are directed at a different project (the Fish Habitat Flows and Water Rights Project), rather than the proposed project analyzed in the Draft EIR. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_FOER-4 As described in Draft EIR Chapter 5.0, Cumulative Analysis, water released from storage in Lake Mendocino includes water imported from the Eel River via Pacific Gas and Electric's (PG&E) Pottery Valley Project (PVP). The PVP was constructed in 1908 and includes a diversion tunnel to transfer water from the Eel River into the Russian River watershed (see Figure 2-1 in Draft EIR). Water is stored in Lake Pillsbury on the Eel River, then released and re-diverted 12 miles downstream at Cape Horn Dam through a diversion tunnel to the Potter Valley powerhouse in the Russian River watershed. The water is discharged from the powerhouse into a canal from which the Potter Valley Irrigation District diverts water. It then flows into the East Fork of the Russian River to Lake Mendocino. PVP diversions are regulated by a license issued to PG&E by the Federal Energy Regulatory Commission (FERC) and serve multiple purposes, including power generation, Potter Valley agricultural irrigation, and minimum instream flow requirements in the East Fork of the Russian River. For a discussion of the relationship of the Estuary Management Project to Russian River flows, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project does not propose changes to Eel River diversions, which are controlled by FERC and PG&E. The Estuary Management Project will govern the Water Agency's management of the Estuary with or without the instream flow levels

proposed by the Fish Flow Project, and regardless of what amount of water is, or is not, diverted by PG&E from the Eel River to the Russian River.

G_FOER-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Refer also to response to comment G_FOER-4 above.

G_FOER-6 The Estuary Management Project is designed to achieve primary dual objectives, of enhancing rearing habitat and managing Estuary water levels to minimize flood hazard (Draft EIR Chapter 1.0, Introduction, Section 1.2). As noted in Draft EIR page 1-1, there is a history of managing the Estuary water levels for flood protection and the Russian River Biological Opinion recognizes flood management as a key consideration in Estuary Management. For a discussion of project alternatives, please refer to Draft EIR Chapter 6.0, Alternatives, which includes analysis of Alternative Flood Control Measures, including establishment of a flood plain management area.

G_FOER-7 Draft EIR Chapter 6.0, Alternatives Analysis, (Section 6.4.6) includes review of Alternative Flood Control Measures, including establishment of a flood plain management area. Additionally, Draft EIR Mitigation Measure 4.2.2 requires the Water Agency to coordinate with NMFS and work with the property owners to identify measures that would, if necessary, substantially minimize or avoid any damages to existing structures that would occur as a result of implementing the project (i.e., increased flooding durations at the 7 and 9 foot elevation). As appropriate, the Water Agency shall survey properties within the 9 foot elevation in greater detail to more accurately and precisely determine the elevation of the structures potentially at risk; this information shall be kept on record at the Water Agency and a copy shall be provided to each of the property owners.

G_FOER-8 Email correspondence provided does not comment on the Draft EIR; however has been included in the record.

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February 12, 2011

To: estuaryproject@esassoc.com
From: Friends of Villa Grande
Subject: Estuary Management Plan draft EIR

The Friends of Villa Grande (FOVG) is a non-profit 501c3 corporation that owns and maintains a public access point to the Russian River in the town of Villa Grande. The FOVG acquired title to the beach access about one and a half years ago through an acquisition process that was partially funded by the Sonoma County Agricultural Preservation and Open Space District (the District). Part of the acquisition process included the grant of a public access easement to the Russian River to the District in perpetuity.

Our property, which is named Patterson Point Preserve (the preserve) consists of about 2 acres of land that we are currently restoring to native conditions. This includes removal of invasive plant species and replacement with native vegetation. We are also preserving and enhancing habitat for native animals. The preserve contains a trail access to two recreational beaches on the Russian River.

The beaches at the preserve and the property itself have been used for recreation by the local community and the general public for over 100 years, dating back to when Villa Grande was subdivided in the early 1900's. Historically, the beach areas have been available for most of the summer months but will become inundated when the mouth of the river is blocked by the sand bar. Typically, these incidences have been fairly brief and have not been frequent through the summer. When the mouth of the river is blocked, the recreational benefit of the preserve is severely diminished.

In the EIR for the subject project, there is no mention of our public access point. There is no analysis of the impacts to our recreational use through inundation. There is no significant analysis of changes to water quality that will result from the project and how these changes may affect our recreational uses for swimming, fishing and other water contact sports. There is no mention of how the proposed project may affect our restoration efforts. The EIR lists potential significant impacts that cannot be avoided to other recreational areas on the river. G_FOVG-1

The issues are broader than those addressed by the estuary EIR. It is limited to the estuary portion of the river and doesn't address the impacts to our reach of the river just upstream of the estuary. Nor does it address river flow rate which we understand will be addressed separately in a different EIR at a later date. G_FOVG-2 The FOVG recommends that the river be addressed as a whole with one EIR. We in the lower river understand the connections between the various components of the river and want to see a complete river EIR. G_FOVG-3

We feel that the EIR is seriously deficient and inadequate in not considering the potential impacts to the preserve. We feel these impacts should be addressed and quantified before any further action is taken on this project and before the EIR is certified as adequate. We request that specific mitigation measures be included in the project to protect our recreational uses and to insure that the restoration of the preserve by FOVG is not interfered with. G_FOVG-4

Sincerely,

Richard L. Holmer,
President, Friends of Villa Grande

Friends of Villa Grande, Richard Holmer, February 12, 2011

L_FOVG-1 Draft EIR Section 4.7, Recreation, includes a discussion of impacts to river front beaches associated with the Estuary Management Project. Although the Draft EIR does not specifically mention Patterson Point Preserve, it is located in the maximum backwater area, shown on Draft EIR Figure 2-3A, and therefore is included in the discussion and quantification of impacts to public and private river beach areas. The Draft EIR text on pages 4.7-3 and 4.7-9 has been modified to specifically include the Patterson Point Preserve, as follows:

> "In the maximum backwater area, there is formal public access at Monte Rio Community Beach, Patterson Point Preserve, and Vacation Beach. Monte Rio Community Beach is located on a large bend in the river and offers picnic amenities and boat rental facilities. This location is frequently used for community gatherings. Patterson Point Preserve is located in Villa Grande and maintained by Friends of Villa Grande for public river recreation and restoration as a redwood and riparian area. Vacation Beach is located at Vacation Beach Road in Guerneville and has a seasonal dam during the summer recreation season that is removed over four days in late September" (page 4.7-3).

> "Public beach access within the maximum backwater area is limited to Monte Rio Community Beach, Patterson Point Preserve, and Vacation Beach. Many of the beach areas occurring within the Estuary Study Area and maximum backwater area do not have formal public access. Inundation associated with higher water levels would reduce the amount of beach acreage available within the Estuary, and these conditions would occur for a longer duration, depending upon performance of the outlet channel" (page 4.7-9).

Comment states that beach, preserve, and property at Patterson Point Preserve will be inundated for a longer duration than historically experienced during the lagoon management period and this precludes restoration efforts and recreational use. Comment does include specifics about restoration efforts at the Patterson Point Preserve. As disclosed in the Draft EIR, increased duration of elevated water levels may preclude use of these riverfront beach areas; clarification of the specific Patterson Point Preserve Area does not change the conclusions presented in the Draft EIR.

Refer also to and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding water quality and public health.

L_FOVG-2 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project**

Description, Impact Areas, and Scope of Analysis, in **Chapter 2, Master Responses**.

L_FOVG-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

L_FOVG-4 Refer to responses to comments G_FOVG-1 and-2 above for a discussion related to the inclusion of potential impacts to the Patterson Point Preserve. For a discussion of mitigation to avoid impacts to recreational and restoration uses, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

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michael@lozeaudrury.com

February 14, 2011 Via e-mail

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Boulevard
Santa Rosa, CA 95403
estuaryproject@esassoc.com

Re: Comments on the Russian River Estuary Management Project Draft Environmental Impact Report

Dear Ms. Martini-Lamb,

Thank you for this opportunity to submit comments on the draft environmental impact report ("DEIR") issued by the Sonoma County Water Agency ("SCWA") for the proposed Russian River Estuary Management Project ("Estuary Project"). The following comments are submitted on behalf of the Russian River Watershed Protection Committee ("RRWPC"). Formed in 1980, RRWPC is a non-profit environmental advocacy organization dedicated to the protection of the Russian River and its recreational uses. RRWPC's approximately 1200 supporters include residents, recreationists, business owners and others who reside or recreate in the lower Russian River, including the Estuary.

RRWPC is concerned about the scope and adequacy of the DEIR for the following reasons:

- The DEIR fails to address the whole of the action being taken by the SCWA because the Estuary Project and SCWA's Fish Habitat Flows and Water Rights Project ("Fish Flow Project") are a single project; G_LozDru-1

- The DEIR's analysis of the existing water quality conditions in the Estuary and characterization of those conditions as "natural" is not supported by substantial evidence; G_LozDru-2

- The DEIR's analysis of water quality impacts is inadequate, and; G_LozDru-3

- The DEIR fails to identify and propose adoption of all feasible mitigation measures available to address the expected water quality impacts of the Estuary Project. G_LozDru-4

RRWPC requests that SCWA revise the DEIR to expand its scope to include the Fish Flow Project and to revise and recirculate the water quality analysis in order to assure that all impacts on water quality will be fully disclosed and mitigated. G_LozDru-5

A. The DEIR Improperly Piecemeals SCWA's Adaptive Russian River Management Project.

RRWPC is very concerned that the DEIR underestimates the impacts to water quality resulting from the Estuary Project because SCWA has opted to bifurcate this Estuary management proposal from SCWA's Fish Flow Project. Applying CEQA's definition of "project," RRWPC believes these two pending proposed actions are one project that must be reviewed together under CEQA. G_LozDru-6

CEQA's conception of a project is broad and the term is broadly construed and applied in order to maximize protection of the environment. (*Nelson v. County of Kern* (2010) 190 Cal.App.4th 252, 271 (2010) (citations omitted).) "The broad scope of the term 'project' prevents 'the fallacy of division,' which is the 'overlooking [of a project's] cumulative impact by separately focusing on isolated parts of the whole.'" (*Id.*, citing *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136, 1144.) A public agency may not divide a single project into smaller individual subprojects to avoid responsibility for considering the environmental impact of the project as a whole. (*Orinda Assn. v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171; *see also Association for a Cleaner Environment v. Yosemite Community College Dist.* ("*ACE*") (2004) 116 Cal.App.4th 629, 638. Rather, "the whole of an action" or the entire activity for which the approvals are being sought must be considered by the agency. (*Nelson*, 190 Cal.App.4th at 271; CEQA Guidelines, § 15378(a) & (c).)

"One way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1226.) Where two acts are steps taken towards the achievement of a common objective, such acts are part of a coordinated endeavor and a single project under CEQA. (*See id.* at 1228; *ACE*, 116 Cal.App.4th at 639.) "The relationship between the particular act and the remainder of the project is sufficiently close when the proposed physical act is among the 'various steps which taken together obtain an objective.'" (*Id.*, citing Robie et al., Cal. Civil Practice—Environmental Litigation (2005) § 8.7.) In determining the whole of an action, courts also look to the timing, physical location and the entity undertaking the action: G_LozDru-7

> When two acts are closely connected in time and location, the potential for related physical changes to the environment in that location is greater than otherwise. Thus, the need for a single review of the environmental impact of the two acts is greater. Also, when the same entity undertakes both matters, it increases the likelihood that the matters are related—that is, are part of a larger whole.

(*Tuolumne County Citizens*, 155 Cal.App.4th at 1227.) Separate governmental approvals do not create separate projects. (*Id.* at 1228; CEQA Guidelines, § 15378(c).)

Applying these principles to the Estuary project and the Fish Flow Project demonstrates that the two proposed actions constitute a single project under CEQA. Both actions share a common objective – to improve habitat conditions in the Russian River for salmon and steelhead. The Estuary Project states its main objective as follows:

> In order to comply with the requirements of the Russian River Biological Opinion, the Water Agency will implement adaptive management of the Estuary with the primary dual objectives of enhancing rearing habitat for juvenile salmonids, particularly steelhead, and managing Estuary water levels to minimize flood hazard. Rearing habitat may be enhanced by reducing tidal influence on the Russian River Estuary from May 15 to October 15 ("lagoon management period") to increase freshwater habitat available for salmon and steelhead.

DEIR, p. 2-11. The Fish Flow Project's objective is "to manage Russian River Project releases to provide instream flows that improve habitat for threatened and endangered fish, while updating the Water Agency's existing water rights to reflect current conditions." Notice of Preparation for Fish Habitat Flows and Water Rights Project, p. 8 (Sept. 29, 2010) (attached as Exhibit A). Like the Estuary Project, the Fish Flow Project's main purpose is to implement the National Marine Fisheries Service's Biological Opinion of September 24, 2008 for "Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed ("Biological Opinion") (excerpt attached as Exhibit B). (DEIR, p. 2-23) ("The Estuary Management Project is one action to be undertaken by the Water Agency to meet the requirements of the Russian River Biological Opinion.") The Project as identified by NMFS in the Biological Opinion includes both the actions now deemed by SCWA as the Fish Flow Project and the beach breaching action at the mouth of the river labeled the Estuary Project. Biological Opinion, p. vii. Both actions are thus directly related to improving habitat for listed salmonids and implementing NMFS' Biological Opinion. The actions are, thus, a coordinated endeavor and one project under CEQA. (*Tuolumne County Citizens*, 155 Cal.App.4th at 1226; *ACE*, 116 Cal.App.4th at 639. *See* DEIS, p. 2-23 ("The Russian River Biological Opinion and the corresponding RRIFR Program include a series of actions to be taken by the Water Agency, in coordination with NMFS and CDFG, to provide benefit to listed salmonids").) G_LozDru-7 cont.

The other criteria considered by the courts also show the two actions comprise a single project under CEQA. The two actions overlap in time. Indeed, although the Fish Flow Project's EIR process has only recently begun, the flow proposals included in that action already are occurring pursuant to the SCWA's Temporary Urgency Change Order petitions to the State Water Resources Control Board each year. The location of the two actions also overlap, both including the lower reaches of the Russian River. Lastly, SCWA is the agency implementing both actions. For all of these reasons, the two actions comprise a single project that must be evaluated in a single EIR.

B. The DEIR's Water Quality Analysis is Inadequate.

As a result, in part, of the DEIR's cramped project scope, the DEIR's discussion of water quality impacts also comes up short. The analysis first downplays the existing degraded water quality conditions found in the Estuary Project affected area. The DEIR then fails to fully analyze the likely water impacts of obstructing the mouth of the river and reduced river flows. Lastly, the DEIR fails to identify feasible mitigation measures to address the Estuary Project's impacts on the water quality of the Russian River's lower reaches. G_LozDru-8

1. The DEIR's analysis of the existing water quality conditions in the Estuary and characterization of those conditions as "natural" is not supported by substantial evidence.

Although acknowledging data that shows pollutant levels in excess of the North Coast Regional Board's water quality objectives, the DEIR misleads the lay reader to think those exceedances are of no importance because levels merely represent "natural conditions" and the Regional Board has not yet included the lower Russian River on its impaired waters list under Section 303(d) of the federal Clean Water Act. These efforts to downplay the serious pollution degradation that already exists in the lower reaches of the river render the DEIR's water quality discussion inadequate.

Just because a waterbody is not listed on the Section 303(d) list does not mean it is not impaired. Based on the data described in the DEIR, the waterbody exceeds Basin Plan water quality objectives for dissolved oxygen and fecal coliforms. The fact that the Regional Board has not yet included the Russian River's lower reaches on the list for certain constituents does not mean that river reach is not already in violation of water quality objectives. Indeed, the Regional Board has now identified serious concerns about the water quality impacts of the Estuary Project, especially as combined with the Fish Flow Project. Letter from Regional Board to SCWA Commenting on NOP (Nov. 15, 2010) (attached as Exhibit C). The DEIR treats the lack of a listing on the impaired waters list as evidence that the high levels of pollutants measured in the project area are merely "indicators of the current conditions of the Estuary that support the beneficial uses identified in the RWQCB Basin Plan for the Lower Russian River, including aquatic habitat and recreation." DEIR, p. 4.3-5. To the general reader who would not be aware of the significance of violations of Basin Plan water quality objectives, this statement suggests that measured exceedances are inconsequential. The DEIR should more clearly describe the measured exceedances of objectives and refrain from suggesting that exceedances are somehow consistent with protecting the beneficial uses the objectives are designed to protect. G_LozDru-9

Similarly, the DEIR improperly downplays the violations of the dissolved oxygen standard measured in the Estuary, claiming they are naturally occurring. DEIR, p. 4.3-19. Given the excessive nutrients known to be in the river, the DEIR's simplistic assertion that depressed DO levels are natural is not supported by any reasonable analysis or substantial evidence. And again, that assertion lulls the general public reviewing the DEIR into a false sense that all is well in the Estuary.

2. The water quality analysis fails to address water quality in the Estuary prior to the creation of the proposed channel.

The DEIR does not describe the length of time it will take water levels in the Estuary to reach the 7 to 9 foot level once the mouth of the river closes. During that undisclosed period of time, no "flow-through" will be occurring. We do know that SCWA will be requesting reduced river flows even before implementation of the Estuary project. We are told that "project implementation would increase the duration of freshwater lagoon conditions from the typical five to 14 day duration currently experienced, to an estimated one- to five- month duration." DEIR, p. 2-12. It appears that the higher water levels allowed before breaching coupled with lower flows in the river will result in an extended period where no "flow-through," "steady- G_LozDru-10

state" system is in place. Thus, although the DEIR asserts that "implementation is not anticipated to adversely affect nutrient or bacteria levels within the Estuary, as closed Estuary conditions would still include flow through processes," it does not address the times where no such flow through process is occurring. The absence of any discussion of water quality conditions during this critical period is a serious omission in the DEIR's analysis. G_LozDru-10 cont.

In addition, no mention is made in the DEIR's water quality analysis of other pollutants that may be at levels of concern in the river and which levels could be exacerbated by the proposed project. Of particular interest to RRWPC and its members are mercury and copper pollution in the river, both of which are particularly toxic to aquatic life. G_LozDru-11

C. The DEIR Fails to Identify and Propose Adoption of All Feasible Mitigation Measures Available to Address The Expected Water Quality Impacts of the Estuary Project.

The DEIR concludes that impacts resulting from potential increases in bacteria, nutrient and salinity levels in the Estuary are significant and unavoidable but does not identify any mitigation measures for these impacts, not even monitoring. CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and mitigation measures. (CEQA Guidelines § 15002(a)(2) and (3); *See also, Berkeley Keep Jets Over The Bay v. Bd. Of Port Commissioners*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." (Guidelines §15002(a)(2).) If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." (Pub.Res.Code § 21081; 14 Cal.Code Regs. § 15092(b)(2)(A) & (B).) G_LozDru-12

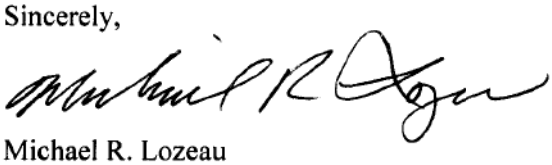
CEQA requires the lead agency to adopt feasible mitigation measures that will substantially lessen or avoid the Project's potentially significant environmental impacts (Pub. Res. Code §§ 21002, 21081(a)), and describe those mitigation measures in the CEQA document. (Pub. Res. Code § 21100(b)(3); CEQA Guidelines § 15126.4.) A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 727 (finding groundwater purchase agreement inadequate mitigation measure because no record evidence existed that replacement water was available).) "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines § 15364.) Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. (Id. at § 15126.4(a)(2).)

A lead agency may not conclude that an impact is significant and unavoidable without requiring the implementation of all feasible mitigation measures to reduce the impacts of a project to less than significant levels. (CEQA Guidelines §§ 15126.4, 15091.)

Although the DEIR purports to rely upon an Adaptive Management Plan, it does not disclose the details comprising that plan. *See* DEIR, pp. 2-12, 4.3-24, 4.3-26. Likewise, the DEIR references some additional monitoring and updating of the Adaptive Management Plan. Perhaps there is an adaptive management plan in a file someplace, but the DEIR does not inform the public or decisionmakers what the plan is, what would trigger its implementation, and what water quality monitoring would occur in the first place. Without describing in the DEIR all the feasible mitigation measures, including the terms of the adaptive management plan, the detailed monitoring requirements and other feasible mitigation measures, including for example possible increases in the flow rate, SCWA cannot make a significant and unavoidable finding for the water quality impacts. G_LozDru-13

RRWPC requests that SCWA revise the DEIR consistent with the above comments and and recirculate the revised DEIR for public review and comment. Thank you again for this opportunity to comment. G_LozDru-14

Sincerely,



Michael R. Lozeau
Lozeau Drury LLP
Attorneys for Russian River Watershed Protection Committee

cc: Brenda Adelman

EXHIBIT A

Comment Letter G_LozDru
Attachment

Notice of Preparation of Environmental Impact Report

September 29, 2010

TO: State Clearinghouse
Responsible and Trustee Agencies
Interested Agencies and Parties

FROM: Sonoma County Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

FISH HABITAT FLOWS AND WATER RIGHTS PROJECT

The Sonoma County Water Agency (Water Agency) is preparing an Environmental Impact Report (EIR) for the proposed *Fish Habitat Flows and Water Rights Project* (Fish Flow Project). The EIR will be prepared by the Water Agency in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the Water Agency's "Procedures for the Implementation of CEQA." The Water Agency will be the lead agency and will consider all comments from responsible and trustee agencies, property owners, and interested persons and parties regarding the scope and content of the information to be included in the EIR. The Fish Flow Project is required by the 2008 National Marine Fisheries Service's Russian River Biological Opinion.

SONOMA COUNTY WATER AGENCY

The Water Agency is a special district created by the California Legislature and operates under the direction of a Board of Directors, composed of the members of the Sonoma County Board of Supervisors. The law that created the Water Agency and defines its powers and duties authorizes it to produce and furnish surface water and groundwater for beneficial uses, to control flood waters, to generate electricity, to provide recreational facilities in connection with Water Agency water supply facilities, and to treat and dispose of wastewater.

BACKGROUND INFORMATION

The Russian River originates in central Mendocino County approximately 15 miles north of Ukiah. The Russian River watershed is shown on Figure 1.

It drains an area of approximately 1,485 square miles, including much of Mendocino and Sonoma counties, and empties into the Pacific Ocean at Jenner in Sonoma County, about 20 miles west of Santa Rosa. The main channel of the Russian River is about 110 miles long and runs generally southward from its headwaters near Redwood and Potter Valleys, to Mirabel Park, where the channel's direction changes to generally westward as it crosses the Coast Range. Principal Russian River tributaries are the East Fork of the Russian River (which receives water diverted from the Eel River through Pacific Gas and Electric Company's (PG&E) Potter Valley Project (PVP), Big Sulphur Creek, Maacama Creek, Dry Creek, and Mark West Creek. Communities and cities along the Russian River include Ukiah, Hopland, Cloverdale, Geyserville, Healdsburg, Forestville, Mirabel Park, Rio Nido, Guerneville, Monte Rio, Duncans Mills, and Jenner.

Two major reservoir projects provide water supply storage in the Russian River watershed: 1) Coyote Valley Dam/Lake Mendocino, located on the East Fork of the Russian River three miles east of Ukiah, and 2) Warm Springs Dam/Lake Sonoma, located on Dry Creek 14 miles northwest of Healdsburg. The Water Agency is the local sponsor for these two federal water supply and flood control projects, collectively referred to as the Russian River Project. Under agreements with the United States Army Corps of Engineers (USACE), the Water Agency manages the water supply storage space in these reservoirs to provide a water supply and maintain summertime Russian River and Dry Creek streamflows.

The Water Agency holds water-right permits[1] issued by the State Water Resources Control Board (SWRCB) that authorize the Water Agency to divert[2] Russian River and Dry Creek flows and to re-divert[3] water stored and released from Lake Mendocino and Lake Sonoma. The Water Agency releases water from storage in these lakes for delivery to municipalities, where the water is used primarily for residential, governmental, commercial, and industrial purposes. The primary points of diversion include the Water Agency's facilities at Wohler and Mirabel Park (near Forestville). The Water Agency also releases water to satisfy the needs of other water users and to contribute to the maintenance of minimum instream flow requirements in the Russian River and Dry Creek established in 1986 by the SWRCB's Decision 1610. These minimum instream flow requirements vary based on defined hydrologic conditions (normal, dry, and critical) that are based on cumulative inflows into Lake Pillsbury in the Eel River watershed.

During the rainy season (October through May), natural streamflow, rather than reservoir releases, accounts for most of the flow in the Russian River. From June through September, some of the flow in the Russian River is composed of water released from storage in Lake

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[1] *SWRCB water-right permits 12947A, 12949, 12950 and 16596.*

[2] *Divert – refers to water diverted directly from streamflows into distribution systems for beneficial uses or into storage in reservoirs.*

[3] *Re-divert – refers to water that has been diverted to storage in a reservoir, then is released and diverted again at a point downstream.*

Mendocino (which includes water imported from the Eel River via PG&E's PVP) and Lake Sonoma.

The Russian River and Dry Creek minimum instream flow requirements of Decision 1610 may no longer be appropriate. Decision 1610 was adopted before the listings of three salmonid species under the federal Endangered Species Act, and did not specifically address the importance of fall storage in Lake Mendocino to the Chinook salmon migration. Although Decision 1610 assumed that higher instream flows were better for fishery resources, information developed in the last decade indicates this may not be so for salmonid species in Dry Creek, the Russian River, and the Russian River estuary. Decision 1610 expressly recognized that later fishery studies might identify a need to change the minimum flow requirements. Decision 1610 also expressly contemplated that such changes might be needed if PG&E's PVP imports changed, as they did in 2006.

The National Marine Fisheries Service (NMFS) issued its Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed (Russian River Biological Opinion) on September 24, 2008.[4] The Russian River Biological Opinion is a culmination of more than a decade of consultation between the Water Agency, the USACE, and NMFS regarding the impact of Water Agency and USACE water supply and flood control activities on three fish species listed under the federal Endangered Species Act: Central California coast steelhead, Central California Coast coho salmon, and California Coast Chinook salmon. Coho salmon are also listed under the California Endangered Species Act (CESA). The California Department of Fish and Game (CDFG) issued a consistency determination on November 9, 2009, finding that the NMFS' Russian River Biological Opinion was consistent with the requirements of the CESA and adopting the measures identified in the Russian River Biological Opinion.

NMFS concluded in the Russian River Biological Opinion that the continued operations of Coyote Valley Dam and Warm Springs Dam by the USACE and the Water Agency in a manner similar to recent historic practices, together with the Water Agency's stream channel maintenance activities and estuary management, are likely to jeopardize and adversely modify critical habitat for endangered Central California Coast coho salmon and threatened Central California Coast steelhead. Specifically, NMFS concluded that the artificially elevated summertime minimum flows in the Russian River and Dry Creek that are currently required by Decision 1610 result in high water velocities that reduce the quality and quantity of rearing habitat for coho salmon and steelhead. Additionally, NMFS concluded that maintaining these flows disrupts lagoon formation in the Russian River estuary and that allowing a lagoon to develop would likely enhance juvenile steelhead and salmon habitat.

[4] *NMFS' Russian River Biological Opinion may be accessed online at www.sonomacountywater.org and may be reviewed at the Water Agency's office at 404 Aviation Boulevard, Santa Rosa, CA.*

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NMFS' Russian River Biological Opinion concludes that reducing Decision 1610 minimum instream flow requirements will enable alternative flow management scenarios that will increase available rearing habitat in Dry Creek and the upper Russian River, and provide a lower, closer-to-natural inflow to the estuary between late spring and early fall, thereby enhancing the potential for maintaining a seasonal freshwater lagoon that would likely support increased production of juvenile steelhead and salmon.[5]

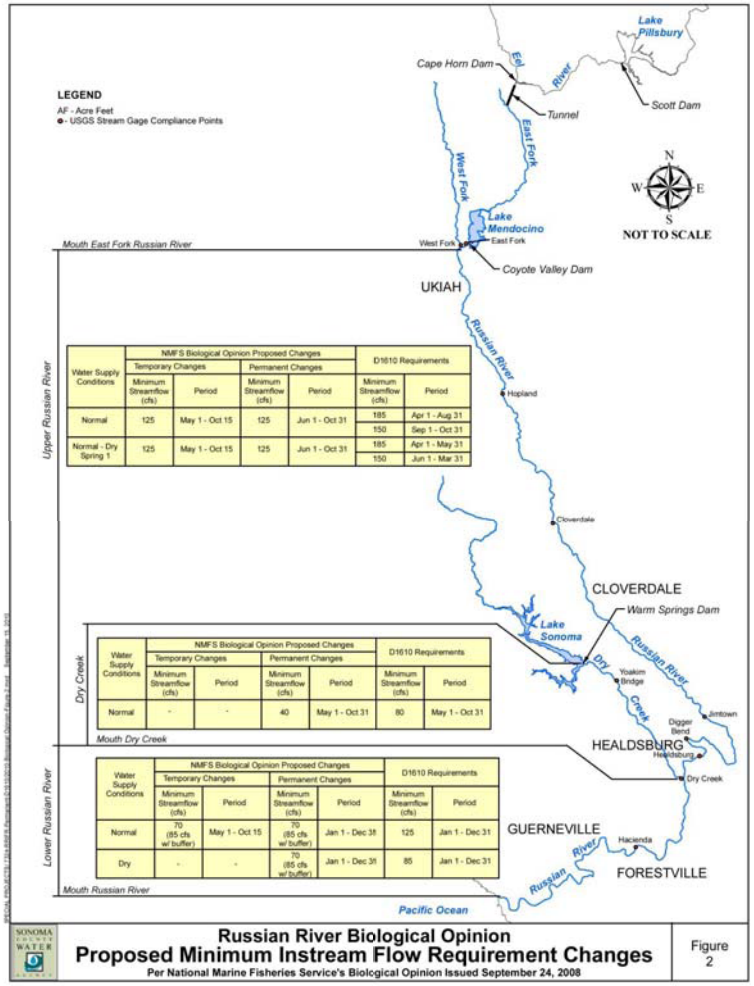
As required by NMFS' Russian River Biological Opinion, in September 2009 the Water Agency filed a petition with the SWRCB to permanently change the Decision 1610 minimum instream flow requirements, in order to improve habitat for endangered Central California Coast coho salmon and threatened Central California Coast steelhead. This petition presently is pending before the SWRCB. The SWRCB will act on this petition after the EIR that is the subject of this notice is prepared.

Until the SWRCB issues an order on this petition, the minimum instream flow requirements specified in Decision 1610 (with the resulting adverse impacts to listed salmonids) will remain in effect, unless temporary changes to these requirements are made by the SWRCB. NMFS' Russian River Biological Opinion requires that the Water Agency petition the SWRCB for temporary changes to the Decision 1610 minimum instream flow requirements each year until the SWRCB issues an order on the Water Agency's petition for the permanent changes to these requirements. NMFS' Russian River Biological Opinion only requires petitions for temporary changes to minimum streamflow requirements for the mainstem Russian River, and not to the requirements for Dry Creek. The Water Agency petitioned the SWRCB for the Biological Opinion-specified temporary changes for the first time in 2010, and the SWRCB made a temporary urgency change in its Order WR 2010-0018-DWR. If approved by the SWRCB, the temporary changes required by NMFS will reduce the minimum instream flow requirement to 70 cubic feet per second (cfs) for the lower Russian River between May 1 and October 15. Additionally, to enhance steelhead rearing habitat in the Russian River between the East Branch and Hopland, the temporary changes, if approved, will reduce the minimum instream flow requirement to 125 cfs for the upper Russian River between May 1 and October 15.[6]

The permanent and temporary changes to Decision 1610 minimum instream flow requirements specified by NMFS in the Russian River Biological Opinion are summarized in Figure 2.

[5] *National Marine Fisheries Service. Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed. p. 243. September 2008.*

[6] *National Marine Fisheries Service. Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed. p 247. September 2008.*



Water Supply Conditions	NMFS Biological Opinion Proposed Changes				D1610 Requirements	
	Temporary Changes		Permanent Changes			
	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period
Normal	125	May 1 - Oct 15	125	Jun 1 - Oct 31	185	Apr 1 - Aug 31
					150	Sep 1 - Oct 31
Normal - Dry Spring 1	125	May 1 - Oct 15	125	Jun 1 - Oct 31	185	Apr 1 - May 31
					150	Jun 1 - Mar 31

Water Supply Conditions	NMFS Biological Opinion Proposed Changes				D1610 Requirements	
	Temporary Changes		Permanent Changes			
	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period
Normal	-	-	40	May 1 - Oct 31	80	May 1 - Oct 31

Water Supply Conditions	NMFS Biological Opinion Proposed Changes				D1610 Requirements	
	Temporary Changes		Permanent Changes			
	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period	Minimum Streamflow (cfs)	Period
Normal	70 (85 cfs w/ buffer)	May 1 - Oct 15	70 (85 cfs w/ buffer)	Jan 1 - Dec 31	125	Jan 1 - Dec 31
Dry	-	-	70 (85 cfs w/ buffer)	Jan 1 - Dec 31	85	Jan 1 - Dec 31

Russian River Biological Opinion
Proposed Minimum Instream Flow Requirement Changes
Per National Marine Fisheries Service's Biological Opinion Issued September 24, 2008

Figure 2

NMFS' Russian River Biological Opinion concluded that, in addition to providing fishery benefits, the lower instream flow requirements "should promote water conservation and limit effects on in-stream river recreation."[7] NMFS stated that the following changes may achieve these goals:

During Normal Years:

1. Reduce the minimum flow requirement for the Russian River from the East Fork to Dry Creek from 185 cfs to 125 cfs between June 1 and August 31; and from 150 cfs to 125 cfs between September 1 and October 31.
2. Reduce the minimum flow requirement for the Russian River between the mouth of Dry Creek and the mouth of the Russian River from 125 cfs to 70 cfs.
3. Reduce the minimum flow requirement for Dry Creek from Warm Springs Dam to the Russian River from 80 cfs to 40 cfs from May 1 to October 31.

During Dry Years:

1. Reduce the minimum flow requirement for the Russian River between the mouth of Dry Creek and the mouth of the Russian River from 85 cfs to 70 cfs.

During the periods that the temporary changes are in effect, the Water Agency will monitor water quality and fish, and collect and report monitoring information as required by NMFS' Russian River Biological Opinion.

In 2002, 2004, 2007, and 2009, water storage levels in Lake Mendocino declined to dangerously low levels. In 2002, the terms of Decision 1610 authorized the necessary reductions in instream flows, but that was not the case in 2004, 2007 and 2009. In those years, the SWRCB made temporary urgency changes to Water Agency water-right permits, and adopted temporary lower instream flow requirements to preserve water in Lake Mendocino. The situation during these years was due to lack of rainfall and, in 2007 and 2009, also was due to lower inflows from PG&E's PVP. Because of the recent reductions in PG&E's PVP diversions from the Eel River into the Russian River, it is no longer reasonable to use cumulative Lake Pillsbury inflows to determine the water-year type (normal, dry, or critical) that governs the level of Russian River and Dry Creek minimum streamflow requirements. It would be more realistic for the water-year type to be based on Russian River watershed conditions rather than on Eel River watershed conditions.

[7] *National Marine Fisheries Service. Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed. p. 244. September 2008.*

FISH HABITAT FLOWS AND WATER RIGHTS PROJECT

Objective

The objective of the Fish Flow Project is to manage Russian River Project releases to provide instream flows that improve habitat for threatened and endangered fish, while updating the Water Agency's existing water rights to reflect current conditions.

Location

The Fish Flow Project would generally be located in the Russian River watershed in Mendocino County and Sonoma County, California, shown on Figure 1. Environmental impacts of the Fish Flow Project would potentially occur at Lake Mendocino, Lake Sonoma, in and along the Russian River downstream of Lake Mendocino/Coyote Valley Dam to Jenner, and in and along Dry Creek downstream of Lake Sonoma/Warm Springs Dam.

Description

The Water Agency would manage water supply releases from Lake Mendocino and Lake Sonoma to provide instream flows in the Russian River and Dry Creek that would improve habitat for listed salmonids. The proposed Fish Flow Project requires approval by the SWRCB of Water Agency petitions to modify the Water Agency's existing water-right permits. In addition to the water-right modifications related to changing the minimum instream flow requirements to improve habitat for fish, the Water Agency also will file petitions with the SWRCB to update the Water Agency's water-right permits to reflect current conditions. The Water Agency will implement the proposed Fish Flow Project if the water-right modifications are made by the SWRCB.

Minimum Instream Flows for Coho Salmon and Steelhead

To comply with the requirements of NMFS' Russian River Biological Opinion, the Water Agency has filed a petition with the SWRCB that asks the SWRCB to make the following changes in the instream flow requirements that are specified in Decision 1610 and the Water Agency's water-right permits:

- between June 1 and August 31 of each year the existing minimum instream flow requirement of 185 cfs is proposed to change to 125 cfs for the upper Russian River (upstream of the confluence with Dry Creek and downstream of the confluence of the East and West Forks)
- between September 1 and October 31 of each year the existing minimum instream flow requirement of 150 cfs is proposed to change to 125 cfs for the upper Russian River (upstream of the confluence with Dry Creek and downstream of the confluence of the East and West Forks)

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- between January 1 and December 31 of each year the existing minimum instream flow requirement of 125 cfs is proposed to change to 70 cfs for the lower Russian River (downstream of its confluence with Dry Creek)
- between May 1 and October 31 of each year the existing minimum instream flow requirement of 80 cfs is proposed to change to 40 cfs for Dry Creek from Warm Springs Dam to the Russian River.

Minimum Instream Flows for Chinook Salmon

Operating water supply releases from Lake Mendocino to preserve or increase the pool of cold water available in Lake Mendocino to support the fall Chinook salmon migration runs is also desirable, and may aid in the conservation and recovery of these threatened species. Although the proposed lower minimum instream flow requirements in NMFS' Russian River Biological Opinion will help to achieve this goal, the Water Agency will file another petition with the SWRCB, requesting that the modifications to minimum instream flow requirements be extended beyond the months required by NMFS' Russian River Biological Opinion for the upper Russian River (upstream of the confluence of Dry Creek and downstream of the confluence of the East and West Forks). These additional months could include those earlier or later in the year, or could be extended to be in effect year-round.

Hydrologic Index

The Water Agency will file another petition with the SWRCB, seeking to change the methodology used to establish the water-year type classifications that determine minimum instream flow requirements for the Russian River, to reflect actual conditions within the Russian River watershed rather than conditions in the Eel River watershed. The proposed hydrologic index will be developed based on appropriate measurements and dates of storage in, or inflows into, Lake Mendocino.

Water-Right Permit Updates

The Water Agency also will file petitions as needed to update its water-right permits to reflect current conditions and to resolve the time extension petitions that are pending before the SWRCB. These actions are not required to implement the proposed new minimum instream flow requirements or to change the hydrologic index, but will ask the SWRCB to consolidate the process to modify and update the Water Agency's water-right permits so that the SWRCB may make all necessary changes to the Water Agency's water-right permits in one order. These actions will include the pending petitions to extend time to complete use of water to December 1, 2020, and also may include new petitions to amend the place-of-use maps for the Water Agency's water-right permits, so that they are based on actual current and expected uses, and to make other updates or clarifications.

The proposed changes to the minimum instream flow requirements and the criteria used to determine the hydrologic index, and the proposed requests for water-right permit updates may change as the Fish Flow Project description and alternatives are further developed.

ISSUES TO BE ADDRESSED IN THE EIR

In accordance with CEQA, the Fish Flow Project EIR will address the potential environmental impacts associated with the Fish Flow Project. Specific areas of analysis may include: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, and Utilities and Service Systems. The EIR will also analyze potential cumulative impacts related to the Fish Flow Project, including potential impacts of other required elements of NMFS' Russian River Biological Opinion. Areas of analysis may be changed based on input received during the Notice of Preparation (NOP) review period. Mitigation measures will be proposed to avoid or reduce such impacts, where reasonably feasible.

The Fish Flow Project EIR will discuss alternatives to the proposed project, and alternatives may be added based on input from the public and regulatory agencies during the NOP review period.

Information to be included in the Fish Flow Project EIR will also be based on input and comments received during the review period for this NOP. Decision-makers, responsible and trustee agencies under CEQA, property owners, and interested persons and parties will also have an opportunity to comment on the Draft EIR after it is published and circulated for public review.

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PUBLIC COMMENT PERIOD FOR THIS NOTICE OF PREPARATION

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than 45 days after receipt of this notice. The public comment period will close at 5:00 p.m. on November 15, 2010. Please include a name, address, and telephone number of a contact person in your agency for all future correspondence on this subject. Please send your comments to:

Sonoma County Water Agency
Attn: Jessica Martini-Lamb, Principal Environmental Specialist
404 Aviation Boulevard
Santa Rosa, CA 95403

You may also submit comments electronically at the Water Agency's website:

www.sonomacountywater.org/rrifr

SCOPING MEETINGS

In order for the public and regulatory agencies to have an opportunity to ask questions and submit comments on the scope of the Fish Flow Project EIR, three Scoping Meetings will be held during the NOP review period. Comment forms will be supplied for those who wish to submit written comments at the scoping meetings; written comments may also be submitted anytime during the NOP review period. The dates, times, and locations of the Scoping Meetings are listed below:

Thursday, November 4th 5:00 p.m. - 9:00 p.m. (Note changed starting time) Monte Rio Community Center 20488 Highway 116 Monte Rio	**Monday, November 8th** 6:00 p.m. - 9:00 p.m. Windsor Town Hall 9291 Old Redwood Hwy Windsor	**Wednesday, November 10th** 6:00 p.m. - 9:00 p.m. The Alex Rorabaugh Center 1640 South State Street Ukiah

Documents or files related to the Fish Flow Project are available for review at the Water Agency's Administrative Office located at 404 Aviation Boulevard, Santa Rosa, CA, 95403.

If you have any questions, or if you wish to update your information on our mailing list, please contact Jessica Martini-Lamb, Principal Environmental Specialist, at (707) 547-1903 or Erica Phelps, Environmental Resources Coordinator, at (707) 547-1934.

Notice of Preparation of Environmental Impact Report

FISH HABITAT FLOWS AND WATER RIGHTS PROJECT

Upcoming Scoping Meetings:

Thursday, November 4th	Monday, November 8th	Wednesday, November 10th
5:00 p.m. - 9:00 p.m. (Note changed starting time) Monte Rio Community Center 20488 Highway 116 Monte Rio	6:00 p.m. - 9:00 p.m. Windsor Town Hall 9291 Old Redwood Hwy Windsor	6:00 p.m. - 9:00 p.m. The Alex Rorabaugh Center 1640 South State Street Ukiah

Sonoma County Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

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EXHIBIT B

Endangered Species Act
Section 7 Consultation

BIOLOGICAL OPINION

for

Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River watershed

G_LozDru-14

PCTS Tracking Number: F/SWR/2006/07316

Action Agency: U.S. Army Corps of Engineers, San Francisco District

Consultation Conducted By: National Marine Fisheries Service, Southwest Region

Date Issued: September 24, 2008

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Table of Acronyms

Ac-ft	acre-feet
BA	Biological Assessment
CDFG	California Dept. Fish & Game
CESA	California Endangered Species Act
CHART	Critical Habitat Analytical Review Team
CIE	Center for Independent Experts
Corps	U.S. Army Corps of Engineers
CVD	Coyote Valley Dam
CVFF	Coyote Valley Fish Facility
D1610	SWRCB Water Right Decision 1610
DCFH	Don Clausen Fish Hatchery
DPS	Distinct Population Segment
ESA	Endangered Species Act
ESU	Evolutionarily Significant Unit
EWSL	Emergency water supply line
FMEP	Fishery Management & Evaluation Plan
HGMP	Hatchery and Genetic Management Plan
LMHPP	Lake Mendocino Hydroelectric Power Plant
LWD	Large woody debris
MCRRFCD	Mendocino County Russian River Flood Control and Water Conservation Improvement District
MOU	Memorandum Of Understanding
NCPA	Northern California Power Agency- (member: *City of Ukiah*)
NCRWQCB	North Coast Regional Water Quality Control Board
NMFS	National Marine Fisheries Service
PCE	Primary Constituent Element (*of critical habitat*)
ppm	parts per million
ppt	parts per thousand
RCD	Resource Conservation District
RPA	Reasonable and Prudent Alternative
RRCSCBP	Russian River Coho Salmon Captive Broodstock Program
SCWA	Sonoma County Water Agency
SWRCB	State Water Resources Control Board
TRT	Technical Recovery Team (*for listed species Recovery Plans*)
VSP	Viable Salmon Population
WSD	Warm Springs Dam
WWTP	Wastewater Treatment Plants
YOY	Young-of-Year (*i.e.*, age 0+ fish)

Comment Letter G_LozDru
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EXECUTIVE SUMMARY

Pursuant to Section 7(a)(2) of the Federal Endangered Species Act (ESA), NOAA's National Marine Fisheries Service (NMFS) consulted with the U.S. Army Corps of Engineers (Corps) regarding its operations of Warm Springs Dam (WSD) and Coyote Valley Dam (CVD) and a suite of activities that are authorized by the Corps and undertaken by the Sonoma County Water Agency (SCWA) and the Mendocino County Russian River Flood Control and Water Conservation Improvement District (MCRRFCD). The Corps, the SCWA, and the MCRRFCD have proposed to implement, for an additional 15 years, ongoing practices and operations at WSD and CVD and activities related to flood control, water diversion and storage, regulation of flows in the Russian River and Dry Creek, estuary management, hydroelectric power generation, channel maintenance, and fish hatchery production.

These actions likely affect Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*), CCC coho salmon (*O. kisutch*), and California Coastal (CC) Chinook salmon (*O. tshawytscha*), each of which is protected as threatened or endangered under the ESA. The proposed actions also likely affect designated critical habitat for these species. The purpose of this consultation is to provide a determination regarding whether the Corps has insured that the proposed project is not likely to jeopardize one or more of these species or destroy or adversely modify their designated critical habitat. If a project is found to jeopardize a species or adversely modify its critical habitat, NMFS must develop a Reasonable and Prudent Alternative (RPA) to the proposed project in coordination with the federal action agency and any applicant. If the project is also expected to result in the incidental take of listed species, NMFS must also provide reasonable and prudent measures (RPM's) to minimize and monitor the impact of the incidental take of listed species.

In this document, we present our analysis and conclusions in the conventional format for biological opinions as described in the Endangered Species Consultation Handbook (U.S. Fish and Wildlife Service and NMFS 1998). This biological opinion includes reviews of the *Consultation History*, a *Description of the Proposed Action*, the *Status of the Species and Critical Habitat*, and the *Environmental Baseline*. Following those reviews we provide an analysis of the *Effects of the Proposed Action*, *Cumulative Effects*, and an *Integration and Synthesis* section in which we analyze the effects of the project in the context of the species status and environmental baseline. This biological opinion concludes with NMFS' determination regarding the impacts of this proposed project on the species' likelihood of survival and recovery, and on the value of the species' critical habitat. Because we have determined that this proposed project is likely to jeopardize the continued existence of some of the salmonid species affected by the proposed project, and adversely modify their critical habitats, we have provided a *Reasonable and Prudent Alternative* (RPA) to the proposed action that 1) avoids jeopardy to the species and adverse modification of critical habitat, 2) can be implemented in a manner consistent with the intended purpose of the action, 3) is economically and technically feasible, and 4) is within the legal authorities of the Corps, SCWA, and MCRRFCD.

The Proposed Action

NMFS analyzed the effects of continued operation of the Russian River Water Supply and Flood Control Project (Project) for a 15 year period on ESA-listed threatened and endangered salmonid species within the Russian River watershed. The Project includes operation of two dams and appurtenant facilities in the Russian River watershed. Together, these facilities are operated to control flooding within the watershed, to supply water to users within and outside the watershed, and to generate hydroelectric power. The altered flow regimes caused by the Project change the natural hydrology of the Russian River estuary, and artificial breaching of a barrier beach at the mouth of the river is often required to prevent flooding adjacent to the estuary. In addition, the Project includes channel maintenance activities that keep the water delivery system functional and reduce the impacts of flooding in the mainstem and some tributaries of the Russian River. The Project also includes operation of two fish hatchery facilities, the Don Clausen Fish Hatchery (DCFH) located at WSD and the Coyote Valley Fish Facility (CVFF) at CVD. SCWA's scope of maintenance responsibilities covered under this Biological Opinion includes maintenance of stream channels and small reservoirs throughout most of an area that SCWA terms Zone 1A, which consists of the Laguna de Santa Rosa watershed, as well as maintenance activities on the Russian River main stem and the segment of Dry Creek downstream from WSD. The Corps' maintenance activities include safety inspections at the two dams. In addition, MCRRFCD conducts channel maintenance activities related to the CVD in the Mendocino County portion of the Russian River. Channel maintenance by both counties is related to Federal sites and inspection of levees under Public Law 84-99 (non Federal sites), but this consultation does not include implementation of the current Corps Operations and Maintenance manual for channel maintenance in the Russian River watershed. Instead, NMFS is consulting on channel maintenance practices as described in Section III.B and referenced to the Corps and SCWA's Biological Assessment where appropriate.

In the initial draft of this Biological Opinion, dated July 11, 2007, NMFS analyzed the implementation of ongoing project operations for ten years, because SCWA and the Corps were contemplating potential complex, future changes in project flow release schedules associated with new water rights and other avenues for increasing reservoir water supplies. Such changes were likely to take at least ten years to accomplish. We were unable to fully analyze both short-term ongoing and future water supply scenarios because of the uncertainties and limited available information about those future scenarios. Originally, the Corps, SCWA, and NMFS agreed that it was prudent to evaluate project effects for the next ten year period because future changes in water supply operations contemplated by SCWA would likely take ten years to fully analyze and develop the permits and water rights agreements/decisions that may yield additional water rights and water supply that would affect flows and habitat in the Russian River and Dry Creek.

During work on the RPA, the Corps, SCWA, and NMFS determined that a major component of the RPA would take up to fifteen years to complete. The remediation of project impacts to designated critical habitat in Dry Creek would take 12 to 15 years to accomplish. NMFS transmitted a working draft biological opinion to the Corps and SCWA on August 1, 2008, and indicated that the timeframe for analysis of the original proposed project would need to be changed from ten years to fifteen years (NMFS 2008b). NMFS also indicated in transmitting the

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working draft that the RPA did not ensure that resulting project operations would not likely jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. Because the project's impact on critical habitat could not be fully addressed in a ten year period, NMFS, the Corps, and SCWA agreed to amend the period of the proposed project from ten to fifteen years (Russian River Project Executive Committee Meeting August 4, 2008). The RPA's approaches to addressing impacts to critical habitat were also discussed between SCWA and NMFS and modified subsequent to the August 1, 2008 working draft.

The water supply and flood control elements of the Project involve the regulation of flood flows to control flooding in properties adjacent to the Russian River, and the storage of water in two reservoirs to be released for water supply in Sonoma, Mendocino, and Marin counties during the spring, summer, and fall. The water supply is released from the reservoirs and flows down the main stem Russian River and Dry Creek to diversion points downstream of the dams. Part of the water stays in the river channel and flows to the Pacific Ocean at the river's mouth near Jenner. The diverted water is delivered to end-users for municipal, industrial, agricultural, and domestic uses.

The keystone elements of the project are CVD, on the East Branch headwaters of the Russian River, and WSD on Dry Creek, a main tributary of the Russian. Russian River water is released from Lake Mendocino (the reservoir formed by CVD) for flood control, and, under the requirements of the State Water Resources Control Board's (SWRCB) Decision 1610 (D1610) for water supply. The Coyote Valley Fish Facility (CVFF) was constructed in 1992 at the base of CVD to mitigate for the loss of salmonid habitat and natural salmonid production upstream of CVD. Water released from Lake Sonoma (the reservoir formed by the WSD) is also released for flood control and water supply. The Don Clausen Fish Hatchery (DCFH) was built at the base of WSD to mitigate for the loss of fish habitat and anadromous salmonid production in the upper Dry Creek watershed. The operation and programmatic purpose of the hatchery has changed to a more adaptive program since its inception. There have been operational changes towards salmonid conservation and recovery to further mitigation goals and to fulfill the Corps' obligation under Section 7 (a)(1) of the ESA. D1610 establishes minimum flow requirements for both Dry Creek and the Russian River. Minimum stream flows under D1610 are specified for four different reaches in the Russian River watershed, assuring high enough summer flows to meet the diversion requirements as well as river-based recreational uses.

In addition to the two major dams in the Russian River watershed, there are several small storage reservoirs, levees, temporary dams, and other elements of the system that contribute to accomplishing the water supply and flood control goals of the Project and are discussed in subsequent sections of this consultation.

Status of the Species and Critical Habitat

In this opinion, NMFS assessed the condition of each of the three listed salmonid species relative to their extinction risk; we also describe the function and role of their respective critical habitats for species conservation. The CCC coho salmon includes coastal populations in rivers entering the ocean along the coasts of Mendocino, Sonoma, Marin, San Mateo and Santa Cruz counties.

The CCC steelhead includes populations ranging from those in the Russian River south to streams in Santa Cruz County, plus populations in streams entering San Francisco Bay (*e.g.*, Sonoma Creek, Napa River, Alameda Creek). CC Chinook salmon include populations of this species in coastal streams ranging from the Russian River north to Humboldt County's Redwood Creek. Our assessment of the status of these species examined the viability (per the framework described by McElhany *et al.* 2000) of populations in four to five distinct geographic areas (termed diversity strata) that constitute each species. For this, we used the diversity strata identified by Spence *et al*. (2008).

Our assessment of extinction risk focuses on the viability of individual populations in each diversity strata in order to appropriately apply the ESU viability criteria provided by Spence *et al*. (2008), which is the current definitive source for ESU viability evaluation. Spence *et al.* (2008) report that for an ESU or DPS to be viable, "representative", "redundancy", and "connectivity" criteria must be met.

CCC coho salmon, which is listed as Endangered, faces the highest risk of extinction of the three salmonid species considered in this opinion. This is evidenced by their precipitous decline in abundance during the last several decades and poor status of population viability metrics (abundance, population growth rates, spatial structure, and genetic diversity). Wild populations of this species were extirpated in the nearby Salmon and Walker Creek watersheds; their distribution has been very highly reduced in the Gualala watershed. The cause of this decline is likely the widespread degradation of habitat, particularly those habitat attributes that support freshwater rearing life stages. The loss of this habitat and the concurrent extirpation of local populations have resulted in a high degree of isolation for the remaining populations.

CCC steelhead is listed as a Threatened Species. Its habitat is degraded throughout the Distinct Population Segment, especially in the two diversity strata with streams bordering San Francisco Bay. However, the diverse life-history strategies of steelhead have helped reduce this species' extinction risk overall. For example, the highly variable time of instream residence (one year to several years) and spawning age allow for effective temporal dispersal within a population. Also individuals within this species are able to spawn in multiple years, unlike coho and Chinook salmon which die shortly after spawning. CCC steelhead appears to be doing best in the more coastal environments and seems more challenged, but persistent in the more inland and urbanized areas. The overall extinction risk of this species is moderate.

The extinction risk for CC Chinook salmon, which is listed as a Threatened Species, is likely intermediate between that of CCC coho salmon and CCC steelhead. Their habitat condition is somewhat better than for the other species mainly because their range lies well north of San Francisco Bay and they do not occupy rearing habitats throughout the summer when stream flows can be very low or negligible. However, habitat degradation is still widespread and is particularly an issue in the upper Eel River. Excluding the reduced returns in 2007, the resurgence in abundance in the Russian River and in other southerly watersheds of this ESU suggests favorable conditions not entirely explained by freshwater habitat analysis. In any case, the more restricted life-history strategy compared to steelhead, relative spatial isolation of the Russian River population, and habitat condition in the Eel River make the extinction risk for CCC Chinook salmon higher than for CCC steelhead.

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Environmental Baseline

The environmental baseline section provides the reference point for the listed species and their habitats within the action area to which NMFS adds the effects of the proposed action. The action area includes the Russian River and its tributaries downstream of WSD and CVD. This large action area is necessary because of the need to address the impacts of straying hatchery fish in the watershed. However apart from that issue, our effects analysis was primarily focused on: 1) the East Branch Russian River below CVD and the main stem Russian River from the confluence of the East Branch to the river's mouth at Jenner, 2) Dry Creek downstream of WSD, and 3) areas of the Mark West Creek watershed that do not contain coho salmon, including Santa Rosa Creek and its tributaries, and the Laguna de Santa Rosa. Because channel maintenance activities in Zone 1A and other project actions were not proposed for portions of the Mark West Creek watershed upstream of its largest tributary the Laguna de Santa Rosa, it was unnecessary to focus on that portion of Zone 1A.

The environmental baseline includes the past and present impacts of all Federal, State, or private actions and other human activities in the action area, the anticipated impacts of all proposed Federal Projects that have already undergone consultation under Section 7 of the ESA, and the impact of State or private actions which are contemporaneous with the consultation process. By establishing the historical and current condition of the species and their habitat in the action area, we describe those conditions to which the effects of the project under consultation are added in our analysis of the project. Our ability to understand factors contributing to the baseline condition is also important for predicting future baseline conditions and likely responses of salmonids to the effects of the proposed action.

Urban, residential, and agricultural developments, timber harvest, road construction, water supply and flood control management activities have had a collective adverse effect on the quality and quantity of spawning, rearing, and migratory habitats for steelhead, coho salmon, and Chinook salmon in the Russian River watershed. Prior to the construction in 1908 of the Potter Valley Hydroelectric Project, which conveys water from the upper Eel River to the upper Russian River, late summer flows in the Russian River were in the vicinity of 20 to 30 cfs. Now with that project, the construction of Scott Dam on the Eel River, CVD, and WSD, the Russian River sustains flows over 185 cfs throughout much of the mainstem and at least 125 cfs flows to the ocean in most summers. Prior to these projects, the river's estuary likely closed during summer months with a barrier beach that formed a large freshwater lagoon providing high quality rearing habitat for steelhead and coho salmon.

Prior to European settlement, the mainstem Russian River was a dynamic meandering river which migrated across its floodplain creating ox-bows and side sloughs. Most of the 110 miles of mainstem and many hundreds of more miles in the tributaries were likely historically available to salmonids for spawning and juvenile rearing (SEC 1996). Both the mainstem and tributaries very likely had an abundance of large woody debris in the form of root wads and fallen logs that created scour pools and provided cover and foraging sites for rearing salmonids (SEC 1996). Summer flows were much lower in the mainstem; however, numerous deep pools likely stratified and contained lower cooler layers. Stream channelization, road construction along stream

margins, bank stabilization, and water diversions in tributaries have significantly degraded stream habitats throughout the watershed by simplifying stream channels, isolating them from their flood plains, greatly increasing sedimentation, blocking fish migrations, and reducing or eliminating flow and cover.

Effects of the Proposed Action

Listed salmonids are adversely affected by operations for flood control at the two project dams, by project flow releases for water supply, by the management of estuary water levels, by the project related hatchery operations, and by channel maintenance activities in both the mainstem and Russian River tributaries. We did not find significant impacts specific to the operations of the small hydroelectric facilities at CVD and WSD.

Flood control releases at CVD have increased the duration of high flows that scour stream substrates and salmonid spawning habitats in the segment of the mainstem Russian River immediately downstream of the East Branch. In addition, the project's proposed rates of flow ramp down of 250 cfs/hr (when flows are 250-1000 cfs) and 1000 cfs/hr (when flows exceed 1000 cfs) likely cause both CC Chinook salmon and CCC steelhead fry and juveniles to be stranded in isolated pools or beached in dewatered areas. The stranded fry and juveniles are likely to experience higher rates of predation. Some fry and juveniles are likely to be stranded in disconnected pool areas that may not become reconnected depending on flow regime, resulting in the death of these fish. Pre-flood and five-year periodic inspections at CVD, which are conducted during late summer, adversely affect juvenile steelhead because the Corps shuts off stream flow at CVD for about two hours with resulting loss of salmonid rearing habitat in the East Branch and stranding of juvenile steelhead in the remaining isolated pools. CVD is also known to release highly turbid water for extended periods well after turbidity levels have diminished upstream of the mainstem's confluence with the East Branch and elsewhere in the river's unregulated tributaries.

Flood operations at WSD likely cause minor scouring of spawning habitat in Dry Creek in the three mile segment immediately below the dam. We estimate that 5 to 10% of the salmonid redds constructed in this segment are likely to be scoured (*i.e.*, lost) when WSD releases are 5000 cfs or greater. The proposed rates of ramp down for WSD flood control operations, which are the same as above for CVD, are expected to cause stranding of fry and juvenile salmon and steelhead in the three mile segment immediately below the dam. However, the steep banks and lack of side channels in this segment are generally not conducive to high stranding rates. The continuous 25 cfs minimum bypass flow at WSD will likely avoid stranding and beaching of juvenile steelhead or coho salmon during annual pre-flood and five-year periodic inspections.

Flood control operations at the dams will affect stream flows in Dry Creek and the main stem during and shortly after heavy precipitation and runoff in winter or early spring. These operations limit peak flows by storing water in the reservoirs, after which the Corps releases those waters downstream during an extended period when flood risk has abated.

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EXHIBIT C

California Regional Water Quality Control Board
North Coast Region
Geoffrey M. Hales, Chairman

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5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

November 15, 2010

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

Subject: Comments on the Notice of Preparation of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project, SCH No. 2010092087

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project (Fish Flow Project EIR). We appreciate the opportunity to participate early in the environmental review process. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The proposed project consists of the management of water supply releases from Lake Mendocino and Lake Sonoma to provide instream flows in the Russian River and Dry Creek. The project proposes to modify the Sonoma County Water Agency's (Water Agency) existing water-right permit to change the minimum instream flow requirements, consistent with the National Marine Fisheries Service's Russian River Biological Opinion dated September 24, 2008.

We have reviewed the NOP for the Fish Flow Project EIR and offer the following recommendations and comments.

General Comments

The mission of the State Water Resources Control Board and Regional Water Boards is to preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. The quality of surface and ground waters in the North Coast Region of California is governed by the *Water Quality Control Plan for the North Coast Region* (Basin Plan) and state-wide Policies. The Basin Plan identifies the existing and potential beneficial uses of water within the North Coast Region and the water quality

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objectives necessary to protect those uses. The relevant existing beneficial uses that apply to the Project area include: Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Groundwater Recharge (GWR), Water Contact Recreation (REC1), Non-Contact Water Recreation (REC2), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), Estuarine Habitat (EST), Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), and Spawning, Reproduction, and/or Early Development (SPWN). The water quality objectives of specific concern to Regional Water Board staff are outlined in the following sections. Together water quality objectives, beneficial uses, the anti-degradation policy, and implementation policies are known as water quality standards. The NOP identifies hydrology and water quality as specific areas of analysis for the EIR, including an analysis of potential cumulative impacts related to the Project. The Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the Project area.

Russian River Water Quality Impairments

Section 303(d) of the federal Clean Water Act and 40 CFR §130.7 require states to identify water bodies that do not meet water quality standards and are not supporting their beneficial uses. These waters are placed on the Section 303(d) List of Water Quality Limited Segments (also known as the list of Impaired Waterbodies). The List identifies the pollutant or stressor causing impairment and establishes a schedule for developing a control plan to address the impairment. On August 4, 2010, the State Water Board adopted the California 2010 303(d) List and the United States Environmental Protection Agency will likely approve or disapprove the 2010 List in November 2010. This 2010 List includes the following three impairments for the Russian River within the Project area: sedimentation/siltation, temperature, and indicator bacteria.

State Water Board staff have begun assessing available data in order to update the 303(d) List. State Water Board staff's assessment includes nutrient and algal biomass data collected within the Project area and submitted by interested parties. At a later date, Regional Water Board staff will consider whether the available data demonstrates that the Russian River within the Project area is impaired for nutrients/biostimulatory substances.

Regional Water Board staff is currently developing a pathogen total maximum daily load (TMDL) for the Russian River to address the indicator bacteria impairments and a temperature implementation policy to address the temperature impairment. The sediment impairment in the Russian River watershed is addressed, in part, by the *Total Maximum Daily Load Implementation Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region* (Resolution No. R1-2004-0087).

California Environmental Protection Agency

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Water Quality Objectives of Concern

The following are the water quality objectives that we believe could be violated under the Fish Flows Project, and a brief explanation of why violations of these objectives are a concern.

Bacteria: *The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels. In no case shall coliform concentrations in waters of the North Coast Region exceed the following: In waters designated for contact recreation (REC-1), the median fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed 50/100 ml, nor shall more than ten percent of total samples during any 30-day period exceed 400/100 ml (State Department of Health Services).*

Per the *Draft Guidance for Fresh Water Beaches* (DHS 2006), freshwater beach posting is recommended when single sample levels exceed the following thresholds: 1) Total coliforms - 10,000 MPN/100mL; 2) E. coli - 235 MPN/100mL; and 3) Enterococcus - 61 MPN/100 mL.

Our working hypothesis, supported in part by preliminary empirical analysis of available data (Attachment 1), is that under a given loading of bacteria from existing sources, reduced flows provides less dilution and may lead to higher bacteria concentrations, potentially causing violation of the bacteria objectives and beach posting thresholds and not supporting REC1 and REC2.

Biostimulatory Substances: *Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.*

Biostimulatory substances include nitrogen and phosphorus. It is generally recognized that flow, along with channel morphology and riparian conditions, is a "risk cofactor" that can affect the bicstimulatory response of nutrients in a waterbody (Tetra Tech 2006). Assuming all other factors are constant, a given concentration of nitrogen and phosphorus in a waterbody can lead to greater biostimulation under reduced flows. Biostimulation can result in more aquatic plant productivity under lower flow conditions.

Dissolved Oxygen: *The instantaneous minimum concentration of dissolved oxygen (DO) required is 7.0 mg/L. Half of the monthly mean DO values for the year must be 10.0 mg/L or greater.*

Reduced DO conditions can occur, particularly during pre-dawn and early morning hours, due to respiration of aquatic plants and decomposition of organic

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matter, which can occur under biostimulatory conditions in a water body. As summarized above, biostimulatory conditions may result from reduced flows in the Project area.

Toxicity: *All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analyses of species diversity, population density, growth anomalies, bioassays of appropriate duration, or other appropriate methods as specified by the Regional Water Board.*

The toxic parameters of concern are blue-green algae toxins. Algal productivity is a biostimulatory response. Algal biomass can include blue-green algae species. Some blue-green algae species produce algal toxins that can be harmful to humans, pets, and wildlife.

Temperature: *The natural receiving water temperature of intrastate waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses.*

At no time or place shall the temperature of any COLD water be increased by more than 5°F above natural receiving water temperature.
At no time or place shall the temperature of WARM intrastate waters be increased more than 5°F above natural receiving water temperatures.

"Natural receiving water temperature" is that temperature regime that would occur in the absence of human alteration of those factors, including flow, which can affect stream temperature. The Fish Flows Project EIR must demonstrate to the satisfaction of the Regional Water Board that the Project does not contribute to violation of the temperature objective. We recommend the use of a water quality model to evaluate temperatures representing baseline, with-project, and natural conditions. The natural condition representation should evaluate temperatures that would be expected to occur without flow augmentation from reservoirs. The model should be capable of predicting hourly temperatures so that the 5°F restriction can be properly evaluated.

Sediment: The Basin Plan contains the following four sediment-related water quality objectives:

Sediment: The suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.

Turbidity: Turbidity shall not be increased more than 20 percent above naturally occurring background levels. Allowable zones of dilution within which higher percentages can be tolerated may be defined for specific discharges upon the issuance of discharge permits or waiver thereof.

Suspended Material: Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.

Settleable Material: Waters shall not contain substances in concentrations that result in deposition of material that causes nuisance or adversely affect beneficial uses.

Flow is a factor that could affect in-stream sediment loads. One potential mechanism for increases in sediment discharges from the Project is a drop is the water table which might lead to loss of riparian vegetation and subsequent bank erosion.

Water Quality Monitoring and Assessment

As stated above, the Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the Project area. This assessment should be based on not only available water quality data, but also new water quality data, the collection of which should be designed specifically to evaluate potential impacts to water quality standards from reduced flows.

The stated objectives of the Russian River Water Quality Monitoring Plan for the Sonoma County Water Agency 2010 Temporary Urgency Change (2010 Monitoring Plan) were, "to provide information to evaluate potential changes to water quality and availability of aquatic habitat for salmonids resulting from the proposed permanent changes to Decision 1610… and provide information to support the development of a CEQA document required for permanent changes to Decision 1610." We support these objectives, and expect the Water Agency to meet them through additional monitoring and assessment efforts in 2011 and beyond. We believe that the assessment of changes in water quality should involve statistical analysis. Statistical analysis of water quality data for trends often requires an adequate time period to detect a statistical change in constituent concentration. The amount of time required to detect a trend is dependent on the sample variability. Constituents like bacterial indicators have a high ambient variability and therefore require longer monitoring time periods before a trend can be detected.

As mentioned previously, Regional Water Board staff are conducting water quality monitoring and assessment in development of an indicator bacteria TMDL for the Russian River within the Project area. In addition, in 2011 Regional Water Board's Surface Water Ambient Monitoring Program will conduct monitoring and assessment of nutrient/biostimulatory conditions within the Project area. Regional Water Board staff will make our data from these projects available to Water Agency staff for your use in

preparing the Fish Flow Project EIR. In addition, Regional Water Board staff are available to work with Water Agency staff to design additional monitoring to support the preparation of the EIR. Finally, Regional Water Board staff are available to consult Water Agency staff on appropriate statistical analyses to conduct on relevant water quality data in order to meet the stated monitoring and assessment objectives of the 2010 Monitoring Plan.

Impacts to Estuary

The Project has the potential to cause elevated water levels within the Russian River estuary. The Fish Flow Project EIR should evaluate the potential for elevated water levels to inundate residential septic systems located near the estuary shore and cause system failures, which could lead to discharges in violation of the Basin Plan.

Though Regional Water Board staff recognize that this Project NOP does not address breaching of the barrier beach between the ocean and the Russian River estuary, we provide the following comments for your consideration. Past activities to artificially breach the barrier beach between the ocean and Russian River Estuary have been covered by a Clean Water Act Section 401 Certification (certification). The current certification (WDID No. 1B04001WNSO) and its amendment expire on December 31, 2010. On September 24, 2008, the National Marine Fisheries Service issued the Biological Opinion entitled "*Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River Watershed*," (File No. 151422SWR2000SR150).

A new certification will need to be applied for and issued for new methods of creating the outlet channel and breaching the estuary that will be more protective of salmonids and the estuarine habitat by providing deeper, cooler, and less saline water for improved rearing habitat for salmonids within the estuary. Flow will be a critical factor to evaluate and include within the certification application. Information on our certification program may be found on our website at: http://www.swrcb.ca.gov/northcoast/water_issues/programs/water_quality_certification.shtml.

Concluding Comments

Regional Water Board staff recognize the potential conflicts between compliance with the National Marine Fisheries Service Biological Opinion and the Basin Plan water quality standards that the Fish Flow Project poses. As summarized above, we are concerned that the Project may contribute to violations of some water quality standards that apply to the Project area. Further, Regional Water Board staff expect the Fish Flow Project EIR to include qualitative and quantitative (i.e. statistical) assessment of whether the Project will cause violations of water quality standards and to include appropriate measures, as necessary, to mitigate identified impacts to these water quality standards.

Regional Water Board staff are available to consult with Water Agency staff in identifying appropriate measures to mitigate potential water quality violations caused by the Project.

Again, we thank you for the opportunity to comment. We look forward to continuing to work with Water Agency staff on this Project in our efforts to protect water quality. If you have any questions regarding these comments, you may contact me or Matt St. John at (707) 570-3762 or MStJohn@waterboards.ca.gov.

Sincerely,

Original signed by

Catherine Kuhlman
Executive Officer

101115_MSJ_FishFlowProject_EIRCommentLetter

cc: Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812
Re: SCH No. 2010092087

Barbara Evoy, Division of Water Rights, State Water Resources Control Board, P.O. Box 2000, Sacramento, CA 95812

Attachment 1
Assessment of Fecal Indicator Bacteria in the Lower Russian River

Regional Water Board staff assessed fecal indicator bacteria (FIB) samples collected from the Russian River for possible effects from variation in stream flow. FIB data for total coliform, E. coli, and enterococcus were compiled from several sources for the assessment.

SCWA conducted water quality monitoring at fifteen (15) sampling locations along the mainstem of the Russian River from May 28, 2009 through October 1, 2009. Samples were also collected by Regional Water Board staff at these same locations during 2009 for the routine beach assessment program. Regional Water Board staff also assessed historical FIB data (1995-2008) collected at six (6) sample locations within the Project area. Nearly 2,000 FIB data samples were available for this assessment (Table 1).

Table 1. Number of Fecal Indicator Bacteria data samples assessed

Location	Total Coliform		E. coli		Enterococcus	
	1995-2008	2009	1995-2008	2009	1995-2008	2009
Camp Rose	177	27	95	27	41	27
Healdsburg Memorial Beach	211	27	103	27	66	27
Steelhead Beach	83	27	81	27	30	27
Forestville Beach	10	27	10	27	10	27
Johnson's Beach	166	27	87	27	30	27
Monte Rio Beach	166	14	88	14	30	14

Data Assessment

The purpose of the Water Agency 2009 sampling was to assess whether the ambient FIB concentrations changed due to the reduction in flow resulting from the minimum flow requirement variance. Regional Water Board staff's assessment includes: (1) visual comparison of 2009 FIB concentration data to historical data, (2) linear regression between stream flow and FIB concentration, (3) FIB load durations curves, and (4) trend analysis.

While there is considerable variability in observed FIB concentrations, both spatially and temporally, within the Project area, Regional Water Board staff's assessment detailed below indicates that some of this variability is correlated with flow conditions. Lower flows appear to result in higher FIB concentrations, and violations of bacteria objectives and beach posting thresholds, in some instances.

Visual Comparisons

Box plots of the FIB data collected in 2009 are visually compared to box plots of all years of historical data collected at each site (Figures 1 – 6). Box plots show data set medians, quartiles, and outliers. The visual comparison suggests that with a few exceptions there is no large apparent difference between FIB concentrations collected in 2009 as compared to past samples collected at each location.

Figure 1. Comparison of the Distribution of FIB Concentrations Measured at Camp Rose.

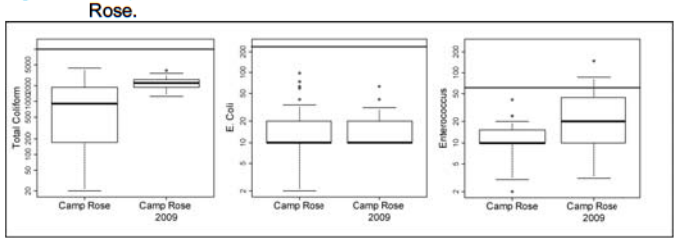


Figure 2. Comparison of the Distribution of FIB Concentrations Measured at Healdsburg Memorial Beach.

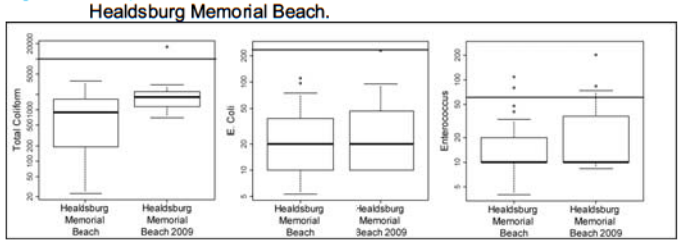


Figure 3. Comparison of the Distribution of FIB Concentrations Measured at Steelhead Beach.

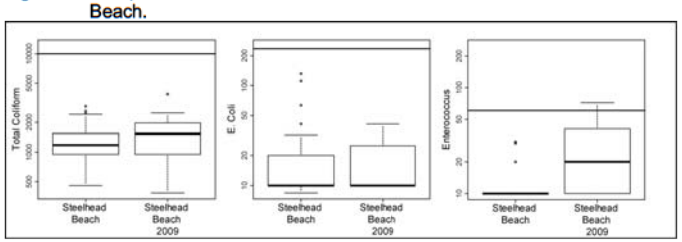


Figure 4. Comparison of the Distribution of FIB Concentrations Measured at Forestville Access Beach.

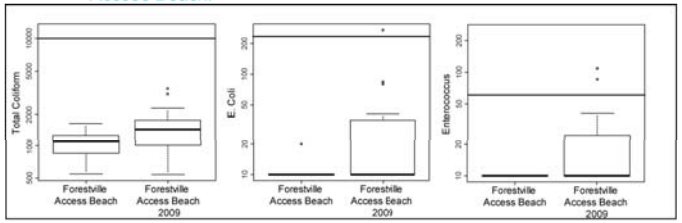


Figure 5. Comparison of the Distribution of FIB Concentrations Measured at Johnson's Beach.

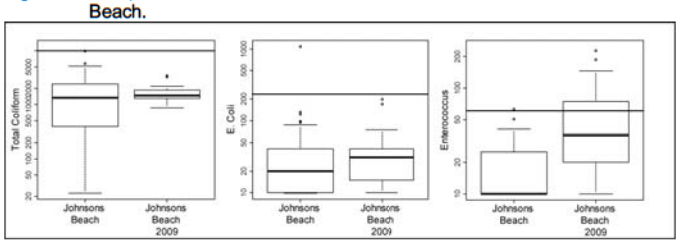
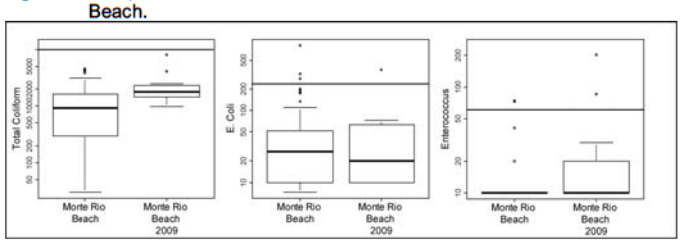


Figure 6. Comparison of the Distribution of FIB Concentrations Measured at Monte Rio Beach.



Linear Regression

The relationship between stream flow and FIB concentrations was assessed using linear regression. Daily stream flow data from the nearby U.S. Geological Survey (USGS) gauging station were matched with each FIB sample. FIB data from Camp Rose and Healdsburg Memorial Beach were compared to daily flows recorded at the USGS gauge near Healdsburg (#11464000). FIB data collected at the other four locations were compared to daily flow recorded at USGS gage near Guerneville (#11467000).

Data were log-transformed to address the normality distribution requirement of regression analysis. Visual inspection of the frequency distribution histograms show that log-transformation of the FIB data resulted in a distributions more normally distributed (Figures 7-10).

Figure 7. Frequency Distribution of Russian River Stream Flow Measurements at USGS Gauges near Healdsburg and Guerneville.

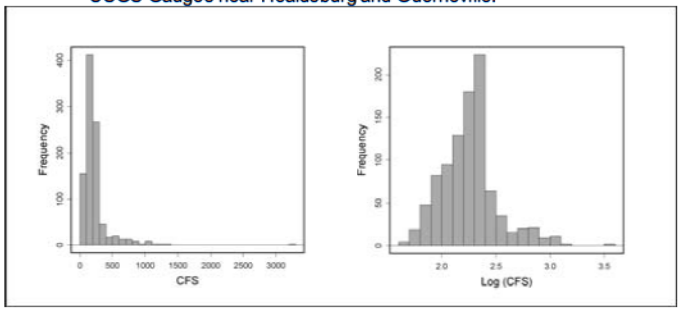


Figure 8. Frequency Distribution of Total Coliform Concentrations at all 6 Sites

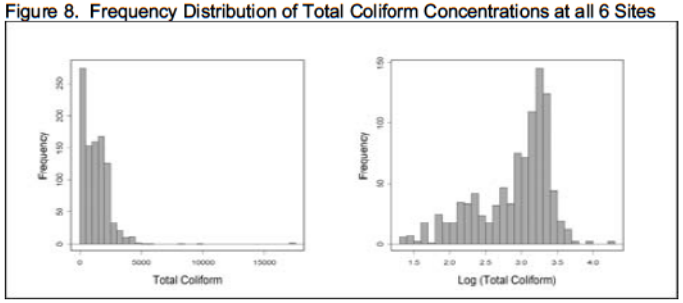


Figure 9. Frequency Distribution of E. coli Concentrations at all 6 Sites

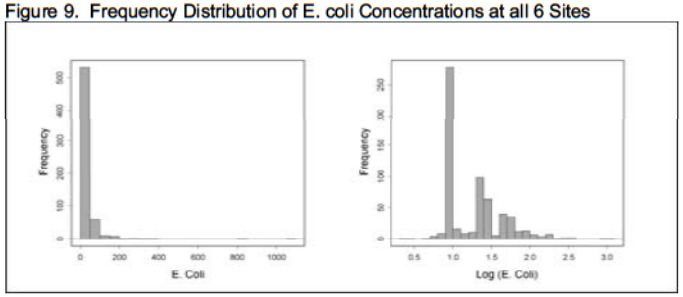
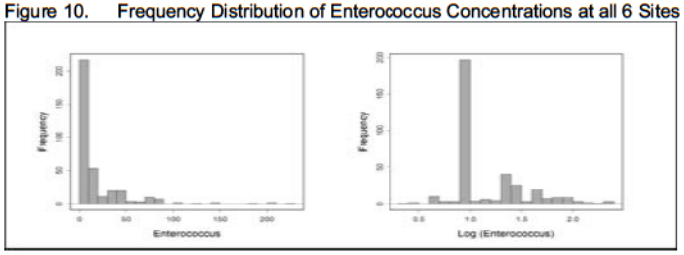


Figure 10. Frequency Distribution of Enterococcus Concentrations at all 6 Sites



G_LozDru-25

Linear regression models were fitted using the Pearson least squares approach with the log-transformed FIB and flow data. Several of the regression analyses show a statistically significant relationship between flow and FIB concentration (Table 2). Most of these significant relationships explain less than 10% of the variance between the variables. However, several locations show a larger influence of flow on FIB concentrations. For example, analysis of enterococcus concentrations collected at Camp Rose show that flow explains nearly half of the variation. The negative slope of the regression line indicates that lower flows result in higher ambient concentrations.

Table 2. Relationship between Stream Flow and Fecal Indicator Bacteria Concentration. **Bold** font indicates a statistically significant regression.

FIB	Site	Explained Variance (%)	Probability	Slope
Total Coliform	Camp Rose	**3%**	**0.02**	-0.37
	Forestville Access Beach	**27%**	**0.00**	0.52
	Healdsburg Memorial Beach	0%	0.67	0.00
	Johnson's Beach	**4%**	**0.00**	-0.42
	Monte Rio Beach	1%	0.17	-0.21
	Steelhead Beach	**4%**	**0.04**	0.14
E. coli	Camp Rose	**4%**	**0.02**	0.19
	Forestville Access Beach	0%	0.71	0.11
	Healdsburg Memorial Beach	1%	0.21	0.13
	Johnson's Beach	0%	0.86	-0.02
	Monte Rio Beach	2%	0.16	0.24
	Steelhead Beach	0%	0.60	0.04
Enterococcus	Camp Rose	**46%**	**0.00**	-1.06
	Forestville Access Beach	1%	0.57	-0.14
	Healdsburg Memorial Beach	**6%**	**0.02**	-0.36
	Johnson's Beach	4%	0.13	-0.33
	Monte Rio Beach	0%	0.90	0.03
	Steelhead Beach	**15%**	**0.00**	-0.41

Load Duration Curves

Load duration curves are a useful tool identifying pollutant problems over the entire flow regime of a river (USEPA, 2007). A load duration curve provides a visual display of the relationship between flow and pollutants, like FIB. The load duration curve presents the frequency and magnitude of FIB measurements along with the allowable loads derived from water quality standards and stream flow data.

First, *flow* duration curves were generated for USGS Russian river flow gauging stations, near Healdsburg (#11464000) and near Guerneville (#11467000). The flow durations curves for the two USGS gauges were developed using daily flow measurements recorded from 1939 to present (Figures 11 & 12).

Figure 11. Flow Duration Curve for Russian River near Healdsburg (#11464000)

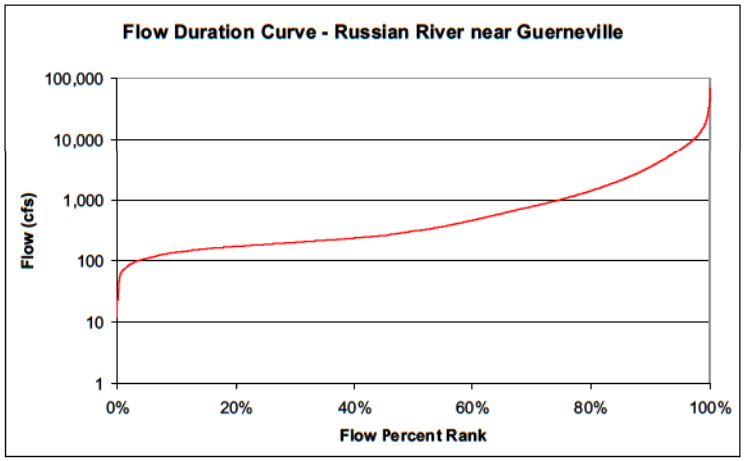
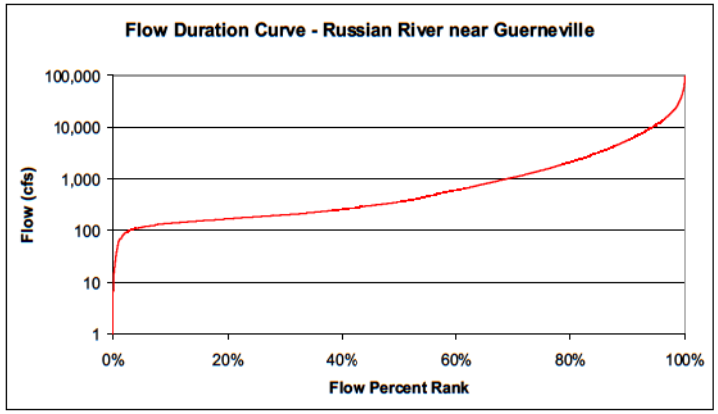


Figure 12. Flow Duration Curve for Russian River near Guerneville (#11467000)



Second, *load* duration curves were prepared for each sampling locations from the measured FIB data and the daily stream flow (Figures 13 - 18). FIB data from Camp Rose and Healdsburg Memorial Beach were compared to daily flows recorded at the USGS gauge near Healdsburg (#11464000). FIB data collected at the other four locations were compared to daily flow recorded at USGS gauge near Guerneville (#11467000). The allowable loads are shown as the solid curve lines; the allowable loads were derived from the water quality thresholds used for beach posting by Sonoma County Health Services (DHS, 2006): (1) Total coliforms not to exceed 10,000 MPN/100mL, (2) E. coli not to exceed 235 MPN/100mL, and (3) Enterococcus not to exceed 61 MPN/100 mL. The results show that exceedance of allowable loads within the Project area tend to occur during periods of lower flow.

Figure 13. Total Coliform Load Duration Curve for Russian River near Healdsburg

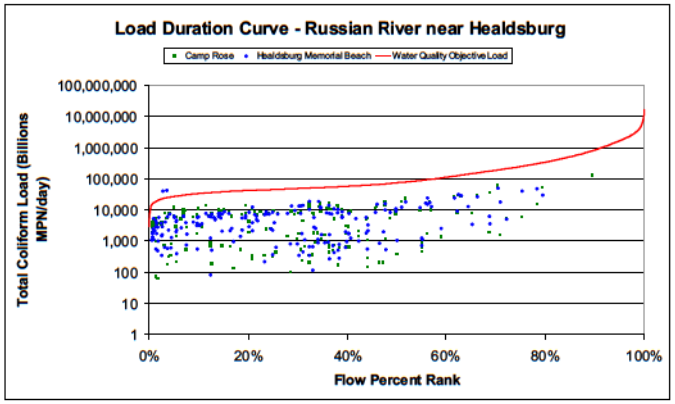


Figure 14. Total Coliform Load Duration Curve for Russian River near Guerneville

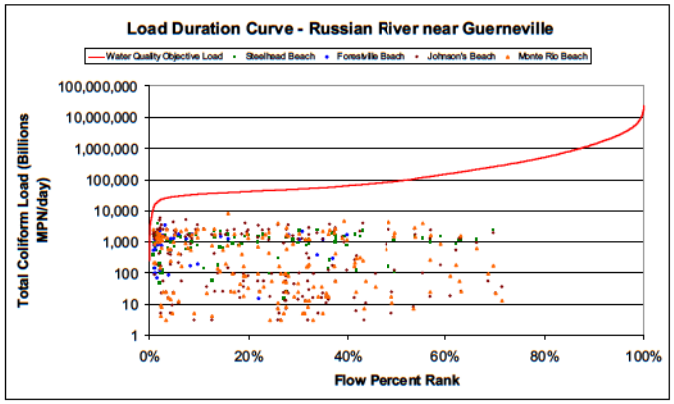


Figure 15. E.coli Load Duration Curve for Russian River near Healdsburg

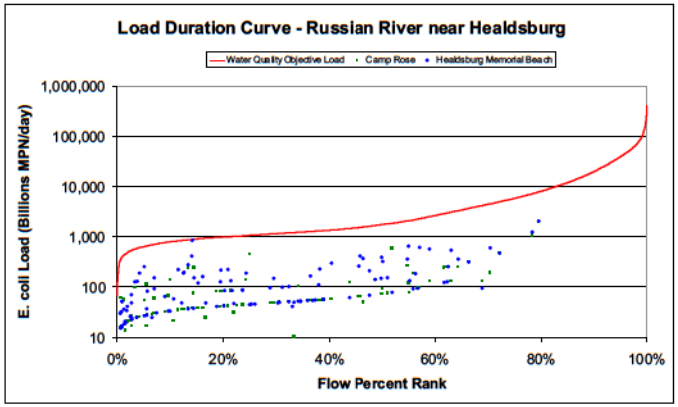


Figure 16. E. coli Load Duration Curve for Russian River near Guerneville

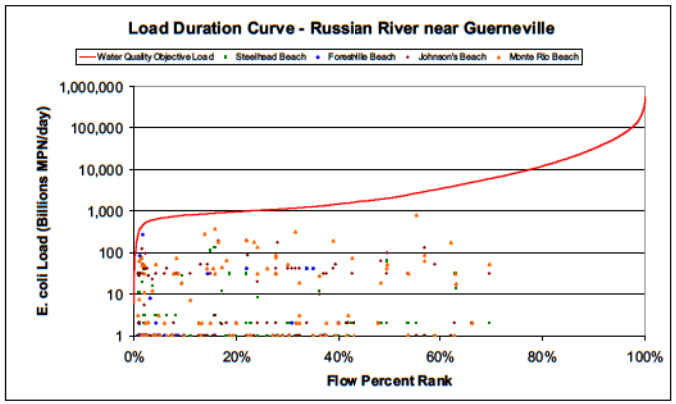


Figure 17. Enterococcus Load Duration Curve for Russian River near Healdsburg

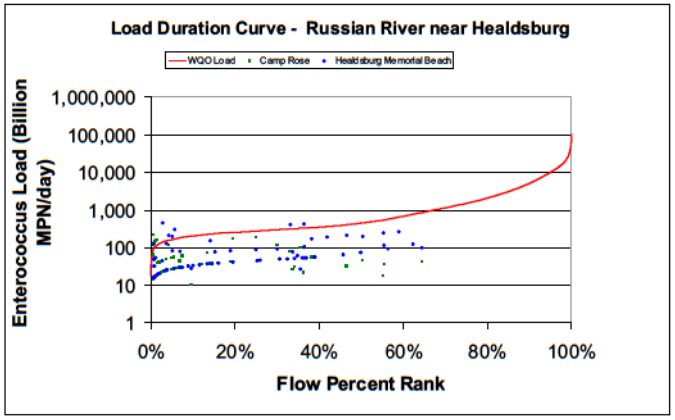
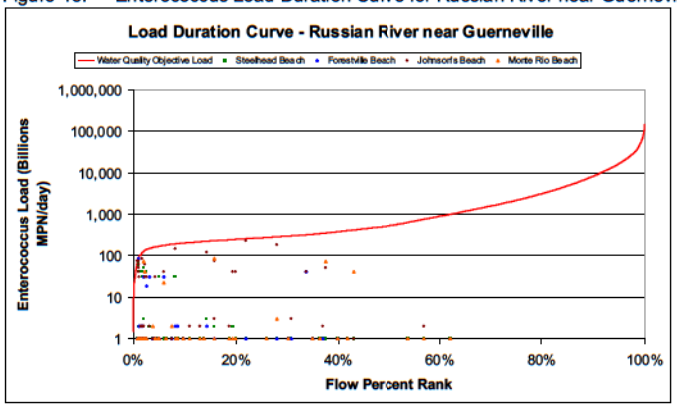


Figure 18. Enterococcus Load Duration Curve for Russian River near Guerneville



Trend Analysis

Trend analysis was conducted for FIB concentrations at each of the six monitoring stations within the Project area using current and historical data. Water quality data possess distributional characteristics that generally require specialized approaches to trend testing. Water quality data sets can contain censored (less than) values, outliers, multiple detection limits, missing values, and serial correlation. These characteristics commonly present problems in the use of conventional parametric statistics based on normally distributed data sets. The presence of censored data, non-negative values, and outliers generally lead to a non-normal data distribution which is common for many data sets. These skewed data sets require use of specific non-parametric statistical procedures for their analysis. Nonparametric statistical tests are more powerful when applied to non-normally distributed data, and almost as powerful as parametric tests when applied to normally distributed data (Helsel and Hirsch, 2002).

The nonparametric Mann-Kendall test for linear trend (Helsel et al. 2006) was used to evaluate whether FIB concentrations have increased or decreased significantly since the base year. The test is non-parametric, rank order based, and insensitive to missing values. Sen's slope estimator (Sen, 1968) was used to estimate the magnitude of change over time when a significant trend was observed. Sen's slope estimator is a non-parametric method that is insensitive to outliers and can be used to infer the magnitude of a trend in the data. Sen's slope estimator is not greatly affected by gross data error or outliers, and it can be computed when data are missing. Sen's slope estimator is closely related to the Mann-Kendall statistic in that all possible slopes are calculated between all possible data pairs and the resulting median slope is the Sen slope. The Sen's slope estimator was used to estimate the slope for the Mann-Kendall test.

The dataset contains FIB concentration measurements with levels below the detection limit of the analytical method. These values were assigned the value of the detection limit. Data sets having large numbers of values below detection limit (BDLs) may create statistical problems for trend analyses. The Mann-Kendall test for trend adjusts variance estimates upward for ties in magnitude. Since BDL values in the raw data set produce such ties, trend analyses of data sets with high percentages of BDLs will be based upon greater variances than those without BDLs. Thus, the power of the trend analyses for the data sets with BDLs are reduced compared to those without detection limits censoring. If the percentage of BDL observations is greater than 50, it is reported there are too many observations below the detection limit to determine the presence or absence of trend.

Trends in FIB concentrations were evaluated for the effect of flow (Table 3). Several of the sites show increasing trend in FIB concentrations. These trends may be due to natural trends in flow due to climate. For example, a trend may be observed if the last

G_LozDru-29

few years in a set of data were collected during drought conditions with lower flows. The effect of the lower flows on the apparent trend can be addressed using the relationship observed between flow and FIB concentration. The regression equation resulting in statistically significant relationship between flow and FIB was applied to the data. The residuals resulting from the difference of the predicted values from the observed value were tested for trend. The results indicate a trend without the influence of flow.

Trends of FIB concentrations were also evaluated by removing the effect of flow from those sampling locations with a statistically significant relationship to flow. The residuals from the significant regression equations derived above were used to assess trend without the influence of flows. Only those locations with a relationship between a FIB and flow could be assessed for flow influence on FIB trend. Accounting for this flow effect did not change the detection of trend in the FIB data for most locations indicating that the flow did not influence observed trends. However, removing the flow effect did result in removing the observed trends for each FIB at Camp Rose.

Table 3. Trends Statistics for Fecal Indicator Bacteria Concentrations

FIB	Site	Probability	Trend Slope	Trend Inclination
Total Coliform	Camp Rose – with flow influence	<0.01	163.3	Increasing
	Camp Rose – without flow influence	<0.01	-0.001	Decreasing
	Forestville Access Beach – with flow influence	0.51	-61.7	None
	Forestville Access Beach – without flow influence	0.70	-38.4	None
	Healdsburg Memorial Beach	<0.01	105.2	Increasing
	Johnsons Beach – with flow influence	<0.01	158.4	Increasing
	Johnsons Beach – without flow influence	<0.01	62.0	Increasing
	Monte Rio Beach	<0.01	128.9	Increasing
	Steelhead Beach – with flow influence	0.56	14.5	None
	Steelhead Beach – without flow influence	0.29	25.4	None
E. coli	Camp Rose – with flow influence	0.34	0.0	None
	Camp Rose – without flow influence	<0.01	-0.001	Decreasing
	Forestville Access Beach	0.49	0.0	None
	Healdsburg Memorial Beach	0.06	0.0	None
	Johnsons Beach	0.59	0.0	None

FIB	Site	Probability	Trend Slope	Trend Inclination
	Monte Rio Beach	0.04	-0.7	Decreasing
	Steelhead Beach	0.53	0.0	None
Entero-coccus	Camp Rose – with flow influence	<0.01	0.6	Increasing
	Camp Rose – without flow influence	0.19	0.00	None
	Forestville Access Beach	0.08	0.0	None
	Healdsburg Memorial Beach – with flow influence	0.18	0.0	None
	Healdsburg Memorial Beach – without flow influence	0.01	0.0	None
	Johnsons Beach	0.01	3.3	Increasing
	Monte Rio Beach	0.95	0.0	None
	Steelhead Beach – with flow influence	<0.01	0.0	None
	Steelhead Beach - without flow influence	0.133	0.0	None

CITATIONS:

California Department of Health Services. 2006. Draft Guidance for Freshwater Beaches. Last Updated May 8, 2006.

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Sen, P. K. 1968. Estimates of the regression coefficient based on Kendall's tau. Journal of the American Statistical Association 63:1379-1389.

Tetra Tech 2006. Technical Approach to Develop Nutrient Numeric Endpoints for California. Prepared for U.S. EPA and California State Water Resources Control Board – Planning and Standards Implementation Unit. Lafayette, CA. 120 pp.

U.S. Environmental Protection Agency. 2007. An Approach for Using Load Duration Curves in the Development of TMDLs. EPA 841-B-07-006. Washington, DC

Lozeau Drury LLP, Russian River Watershed Protection, February 14, 2011

G_LozDru-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_LozDru-2 For a discussion of Draft EIR's characterization of existing water quality conditions in the Estuary and impacts analyzed in the Draft EIR, refer to Draft EIR Chapter 3.0, Project Background and Environmental Setting, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of adequacy of the EIR analysis, refer to **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**.

G_LozDru-3 For a discussion of the range of water quality impacts analyzed in accordance with CEQA Guidelines in the Draft EIR, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. This comment is general and does not identify a specific inadequacy in the water quality analysis in the Draft EIR.

G_LozDru-4 Refer to **Master Response 2.4, Water Quality,** and **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility,** in **Chapter 2, Master Responses**, for a discussion of potential water quality impacts and feasible mitigation.

G_LozDru-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flow and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Please also refer to **Master Response 2.9, Recirculation of Draft EIR**, for a discussion of the CEQA requirements that would trigger recirculation.

G_LozDru-6 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_LozDru-7 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and the respective project objectives and timing, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The TUCPs are not proposed as part of the Estuary Management Project and are not included in the project's environmental analysis. The potential for the Estuary Management Project to contribute cumulatively to impacts related to TUCPs are

considered in a cumulative analysis (Draft EIR, Chapter 5.0, Cumulative Analysis) and includes information on the CEQA analysis for the TUCP. The TUCPs result from a separate requirement of the Biological Opinion and have been found by the State Water Resources Control Board to be exempt from CEQA.

G_LozDru-8 The Estuary Management Project would not obstruct the Russian River mouth. As discussed in Draft EIR Chapter 2.0, Project Description, the outlet channel would be created following natural closure events. Water quality conditions existing in the Estuary, including existing impairments for temperature and sediment, are characterized in Chapter 3.0, Project Background and Environmental Setting, and analyzed in Section 4.3, Water Quality. For additional discussion of Draft EIR's characterization of existing water quality conditions in the Estuary and impacts analyzed in the Draft EIR, and monitoring required under the Russian River Biological Opinion refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of the relationship, and cumulative effects to water quality, of the Estuary Management Project to the proposal to lower minimum instream flows as required by the Russian River Biological Opinion, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_LozDru-9 Under CEQA, baseline conditions are considered the physical conditions at the time of the Notice of Preparation. Water quality conditions existing in the Estuary, including occurrences of dissolved oxygen and relationship of the Estuary Management Project to Basin Plan Water Quality Objectives, are characterized in Chapter 3.0, Project Background and Environmental Setting, and analyzed in Section 4.3, Water Quality. Draft EIR Section 4.3, Water Quality describes the impairments listed on the 303(d) list and applicability to the Estuary Management Project. Impacts 4.3.2, beginning on page 4.3-17, evaluates potential changes in dissolved oxygen levels; Impact 4.3.3 addressed nutrients and bacteria. Conclusions of the analyses are based on review of best available data relative to these parameters. For additional discussion refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_LozDru-10 Draft EIR Section 4.3, Water Quality, beginning on page 4.3-22, provides a discussion of residence time within the estuary. In 2009, the Water Agency contracted with Bodega Marine Laboratory (U.C. Davis) to provide a view of circulation, stratification, residence and salinity in the Russian River Estuary over summer and fall months of 2009. Residence time is a function of river flows into the Estuary, discharge at the river mouth, seepage through the barrier beach, and other losses, such as evaporation and groundwater infiltration. Under current conditions, the estimated residence time in the Estuary ranges from approximately one day, during open tidal conditions, to approximately 27 days, under full closure conditions. With artificial breaching under existing conditions,

the actual residence time within the Estuary during closure events is the time period between barrier beach formation and the implementation of artificial breaching by the Water Agency. This time period is typically between five and 14 days. The fill rate of the estuary is approximately 0.5 feet per day at a flow of 185 cfs. This closed condition is the time between closure and Water Agency artificial breaching. Implementation of the Estuary Management Project would not alter the rate of inflow into the Estuary, or the fill rate of the Estuary. Under the Estuary Management Plan, creation of the outlet channel to support water elevations of 7 to 9 feet would not alter the duration of fully-closed estuary conditions. Rather, it would establish an outlet channel that would result in "steady-state" conditions within the same approximately timeframe. The definition of "steady-state" in the Draft EIR (defined as the continuous outflow condition after the outlet channel is established) conflicts with the commenter's use of the terms (defined as the period of closure before the outlet channel is created).

As presented in the Draft EIR Section 4.3, Water Quality (page 4.3-23), based upon the lowest observed flows of 70-85 cfs, and stratified conditions observed during the 2009 closure, residence time for the proposed project is estimated to range between 14 days and 22 days, depending upon the depth of the freshwater layer that is established. This represents an increase in estimated residence time of approximately one week, compared to the typical residence time of between five and 14 days associated with artificial breaching under existing conditions. It should be noted that during the extended closure in October 2009, residence time was extended to the duration of the 29-day closure. During that time period, no nuisance conditions were observed.

That is to say, inflow to the estuary would be matched primarily by outflow conveyed by the channel and seepage through the barrier beach. Other natural loses, such as evaporation, would provide additional, but minor losses. Therefore, establishment of the outlet channel would include flow through the Estuary towards the outlet channel, as opposed to full closure conditions, when output is limited to seepage through the barrier beach (Draft EIR Section 4.3, Water Quality, pages 4.3-22 and -23). For additional information regarding fish and wildlife, refer to Draft EIR Section 4.5, Fisheries.

G_LozDru-11 Please refer to **Master Response 2.4, Water Quality.** The Estuary Management Project would not create or control sources of discharges of pollution or pollutant loads into the Russian River system.

G_LozDru-12 Refer to the analysis provided in Draft EIR Section 4.3, Water Quality, and the discussion in **Master Response 2.4, Water Quality,** and **Master Response 2.6, Recreational Impacts**, **Socioeconomic Impacts, and Mitigation Feasibility**, in **Chapter 2, Master Responses**, for discussion related to Draft EIR analysis and

level of significance of impacts on parameters, including but not limited to bacteria, nutrients, and salinity, monitoring required under the Russian River Biological Opinion.

G_LozDru-13 Refer to **Master Responses 2.3, Project Feasibility**, for a discussion related to the adaptive management process, and **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**.

G_LozDru-14 Refer to **Master Response 2.9, Draft EIR Recirculation**, in **Chapter 2, Master Responses**.

February 14, 2011

Jessica Martini-Lamb
Sonoma County Water Agency
Administrative Office - 404 Aviation Blvd
Santa Rosa CA 95403

Re: Estuary Management Project Draft EIR

To start with, the Estuary Management Project DEIR is deficient due to project segmentation-- a lack of analysis or insufficient analysis of how controlling the flow regime indicated by the Biological Opinion would affect flows from the Dry Creek confluence downstream through the lower river sections into the estuary. As part of the BO, flows will be controlled, at least partially, by dam releases and SCWA pump uptakes. The proposed lower flows may cause significant adverse environmental impacts to that section of the river. Since the DEIR is only dealing with a part of assessment of impacts and alternatives to the overall river health project, it is considered improper segmentation in violation of CEQA. G_NCRW-1

The DEIR does not do an analysis or a sufficient analysis of water quality in the lower reaches of the Russian River as indicated in the letter from the California Regional Water Quality Control Board North Coast Region Geoffrey M. Hales to Ms. Jessica Martini-Lamb, Sonoma County Water Agency, on November 15, 2010. As stated in the conclusion of their letter, "...we are concerned that the Project may contribute to violations of some water quality standards that apply to the Project area. Further, Regional Water Board staff expect the Fish Flow Project EIR to include qualitative and quantitative (i.e. statistical) assessment of whether the Project will cause violations of water quality standards and to include appropriate measures, as necessary, to mitigate identified impacts to these water quality standards." Without this analysis, the DEIR is deficient in this regard. G_NCRW-2

In the alternatives analysis in the DEIR, costs of projects were asserted using a subjective descriptor such as "substantial". This descriptor is used in connection with the Jetty Modification and Alternative Flood Management alternatives. For Flood Management the cost is a one-time expense creating a more naturalized regime to the river mouth verses the continued artificial breaching and channeling into the distant future. Without even a crude cost analysis wherever cost is an issue and only described by words as "substantial", the Alternative Analysis section is deficient in the DEIR. G_NCRW-3

The Alternative Analysis that weighs impacts and feasibility is inadequate. The decision for the project chosen is not supported by substantial evidence in the record. The method identified in the DEIR was to pick one alternative or variable out of a list of possible alternatives as the solution to the problem. If a superior solution included two or more of them, this was not considered. The analysis of this section actually referred to utilizing alternatives in combination but only in the negative. I don't think CEQA precludes analyzing two or more alternatives that together would G_NCRW-4

meet the project outcomes. As an example, by selecting the Alternative Flood Management and Habitat Restoration, the first would naturalize the estuary regime and stop artificial breaching and channeling and the second would provide the necessary nurseries for salmonid development. In addition, there appears to be a statement of outcome when the actual outcome is much less predictable. This comes from Table 6.2 under Proposed Project where this statement occurs: "Yes. Would use outlet channel creation to maintain perched freshwater lagoon conditions during May 15 to October 15. Would provide 4,565 af of storage volume at 9 feet." The confidence of this outcome is purportedly based on an outlet channel constructed on a different river in another watershed without having some of the specific attributes impacting the Russian River mouth and estuary. G_NCRW-4 cont.

Designs of the outlet channel were varied depending on various scenarios. The final determination was not a project with a specific set of criteria but instead a process—adaptive management. How can this be a positive yes for meeting project objectives while the jetty alternative, for example, is unknown? Moreover, the attempts at creating a successful outlet channel have failed thus far. One could conclude that the response in the box under Proposed Project should be unknown, at best. G_NCRW-5

From the DEIR it appears that other factors are really in the "unknown" category when it comes to creating stratification layers and how beneficial this will be on all the salmonid species, how rates of predation will manifest itself in a managed closed estuary, what the impacts on pinnipeds would be from managed openings, channeling, and other construction activities. It is one thing to have a naturalized system where openings and closings happen due to the various ocean manifestations and stream flow but when purposeful human activity causes those adverse impacts, whether intended or unintended consequences, this is creates a legal liability and should be refrained. G_NCRW-6

The analysis of the disruption and potential harm from constructive activity itself in the estuary appears to be insufficient in the DEIR. In my opinion, this is the one factor that should be completely eliminated due to its obvious disruption to all wildlife including the ones of particular concern of the BO and the potential harm and take due to unintended consequences. All other alternatives could be evaluated based on their benefits with consideration of the briefest construction or deconstruction to obtain intended outcomes. G_NCRW-7

I reserve the right to add to my comments when the data that I requested from the lead agency in November 2010 is received and reviewed by me. G_NCRW-8

Sincerely,

Larry Hanson, Manager

NCRW

Regional Water Board staff are available to consult with Water Agency staff in identifying appropriate measures to mitigate potential water quality violations caused by the Project.

Again, we thank you for the opportunity to comment. We look forward to continuing to work with Water Agency staff on this Project in our efforts to protect water quality. If you have any questions regarding these comments, you may contact me or Matt St. John at (707) 570-3762 or MStJohn@waterboards.ca.gov.

Sincerely,

Catherine Kuhlman Executive Officer
101115_MSJ_FishFlowProject_EIRCommentLetter

cc:
Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812 Re: SCH No. 2010092087
Barbara Evoy, Division of Water Rights, State Water Resources Control Board, P.O. Box 2000, Sacramento, CA 95812

California Regional Water Quality Control Board North Coast Region Geoffrey M. Hales, Chairman

November 15, 2010

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

Subject: Comments on the Notice of Preparation of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project, SCH No. 2010092087

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project (Fish Flow Project EIR). We appreciate the opportunity to participate early in the environmental review process. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The proposed project consists of the management of water supply releases from Lake Mendocino and Lake Sonoma to provide instream flows in the Russian River and Dry Creek. The project proposes to modify the Sonoma County Water Agency's (Water Agency) existing water-right permit to change the minimum instream flow requirements, consistent with the National Marine Fisheries Service's Russian River Biological Opinion dated September 24, 2008.
We have reviewed the NOP for the Fish Flow Project EIR and offer the following recommendations and comments.

General Comments

The mission of the State Water Resources Control Board and Regional Water Boards is to preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. The quality of surface and ground waters in the North Coast Region of California is governed by the *Water Quality Control Plan for the North Coast Region* (Basin Plan) and state-wide Policies. The Basin Plan identifies the existing and potential beneficial uses of water within the North Coast Region and the water quality

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Attachment

objectives necessary to protect those uses. The relevant existing beneficial uses that apply to the Project area include: Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Groundwater Recharge (GWR), Water Contact Recreation (REC1), Non- Contact Water Recreation (REC2), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), Estuarine Habitat (EST), Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), and Spawning, Reproduction, and/or Early Development (SPWN). The water quality objectives of specific concern to Regional Water Board staff are outlined in the following sections. Together water quality objectives, beneficial uses, the anti-degradation policy, and implementation policies are known as water quality standards. The NOP identifies hydrology and water quality as specific areas of analysis for the EIR, including an analysis of potential cumulative impacts related to the Project. The Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the

Project area.

Russian River Water Quality Impairments
Section 303(d) of the federal Clean Water Act and 40 CFR §130.7 require states to identify water bodies that do not meet water quality standards and are not supporting their beneficial uses. These waters are placed on the Section 303(d) List of Water Quality Limited Segments (also known as the list of Impaired Waterbodies). The List identifies the pollutant or stressor causing impairment and establishes a schedule for developing a control plan to address the impairment. On August 4, 2010, the State Water Board adopted the California 2010 303(d) List and the United States Environmental Protection Agency will likely approve or disapprove the 2010 List in November 2010. This 2010 List includes the following three impairments for the Russian River within the Project area: sedimentation/siltation, temperature, and indicator bacteria.

State Water Board staff have begun assessing available data in order to update the 303(d) List. State Water Board staff's assessment includes nutrient and algal biomass data collected within the Project area and submitted by interested parties. At a later date, Regional Water Board staff will consider whether the available data demonstrates that the Russian River within the Project area is impaired for nutrients/biostimulatory substances.

Regional Water Board staff is currently developing a pathogen total maximum daily load (TMDL) for the Russian River to address the indicator bacteria impairments and a temperature implementation policy to address the temperature impairment. The sediment impairment in the Russian River watershed is addressed, in part, by the *Total Maximum Daily Load Implementation Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region* (Resolution No. R1-2004-0087).

Water Quality Objectives of Concern

The following are the water quality objectives that we believe could be violated under the Fish Flows Project, and a brief explanation of why violations of these objectives are a concern.

Bacteria: *The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels. In no case shall coliform concentrations in waters of the North Coast Region exceed the following: In waters designated for contact recreation (REC-1), the median fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed 50/100 ml, nor shall more than ten percent of total samples during any 30-day period exceed 400/100 ml (State Department of Health Services).*

Per the *Draft Guidance for Fresh Water Beaches* (DHS 2006), freshwater beach posting is recommended when single sample levels exceed the following thresholds: 1) Total coliforms - 10,000 MPN/100mL; 2) E. coli - 235 MPN/100mL; and 3) Enterococcus - 61 MPN/100 mL.

Our working hypothesis, supported in part by preliminary empirical analysis of available data (Attachment 1), is that under a given loading of bacteria from existing sources, reduced flows provides less dilution and may lead to higher bacteria concentrations, potentially causing violation of the bacteria objectives and beach posting thresholds and not supporting REC1 and REC2.

Biostimulatory Substances: *Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.*

Biostimulatory substances include nitrogen and phosphorus. It is generally recognized that flow, along with channel morphology and riparian conditions, is a "risk cofactor" that can affect the biostimulatory response of nutrients in a waterbody (Tetra Tech 2006). Assuming all other factors are constant, a given concentration of nitrogen and phosphorus in a waterbody can lead to greater biostimulation under reduced flows. Biostimulation can result in more aquatic plant productivity under lower flow concitions.

Dissolved Oxygen: *The instantaneous minimum concentration of dissolved oxygen (DO) required is 7.0 mg/L. Half of the monthly mean DO values for the year must be 10.0 mg/L or greater.*

Reduced DO conditions can occur, particularly during pre-dawn and early morning hours, due to respiration of aquatic plants and decomposition of organic matter, which can occur under biostimulatory conditions in a water body. As

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summarized above, biostimulatory conditions may result from reduced flows in the Project area.

Toxicity: *All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analyses of species diversity, population density, growth anomalies, bioassays of appropriate duration, or other appropriate methods as specified by the Regional Water Board.*

The toxic parameters of concern are blue-green algae toxins. Algal productivity is a biostimulatory response. Algal biomass can include blue-green algae species. Some blue-green algae species produce algal toxins that can be harmful to humans, pets, and wildlife.

Temperature: *The natural receiving water temperature of intrastate waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses.*

At no time or place shall the temperature of any COLD water be increased by more than 5°F above natural receiving water temperature. At no time or place shall the temperature of WARM intrastate waters be increased more than 5°F above natural receiving water temperatures.

"Natural receiving water temperature" is that temperature regime that would occur in the absence of human alteration of those factors, including flow, which can affect stream temperature. The Fish Flows Project EIR must demonstrate to the satisfaction of the Regional Water Board that the Project does not contribute to violation of the temperature objective. We recommend the use of a water quality model to evaluate temperatures representing baseline, with-project, and natural conditions. The natural condition representation should evaluate temperatures that would be expected to occur without flow augmentation from reservoirs. The model should be capable of predicting hourly temperatures so that the 5°F restriction can be properly evaluated.

Sediment: The Basin Plan contains the following four sediment-related water quality objectives:

Sediment: The suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.

Turbidity: Turbidity shall not be increased more than 20 percent above naturally occurring background levels. Allowable zones of dilution within which higher percentages can be tolerated may be defined for specific discharges upon the

issuance of discharge permits or waiver thereof.

Suspended Material: Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.
Settleable Material: Waters shall not contain substances in concentrations that result in deposition of material that causes nuisance or adversely affect beneficial uses.

Flow is a factor that could affect in-stream sediment loads. One potential mechanism for increases in sediment discharges from the Project is a drop is the water table which might lead to loss of riparian vegetation and subsequent bank erosion.

Water Quality Monitoring and Assessment
As stated above, the Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the Project area. This assessment should be based on not only available water quality data, but also new water quality data, the collection of which should be designed specifically to evaluate potential impacts to water quality standards from reduced flows.
The stated objectives of the Russian River Water Quality Monitoring Plan for the Sonoma County Water Agency 2010 Temporary Urgency Change (2010 Monitoring Plan) were, "to provide information to evaluate potential changes to water quality and availability of aquatic habitat for salmonids resulting from the proposed permanent changes to Decision 1610... and provide information to support the development of a CEQA document required for permanent changes to Decision 1610." We support these objectives, and expect the Water Agency to meet them through additional monitoring and assessment efforts in 2011 and beyond. We believe that the assessment of changes in water quality should involve statistical analysis. Statistical analysis of water quality data for trends often requires an adequate time period to detect a statistical change in constituent concentration. The amount of time required to detect a trend is dependent on the sample variability. Constituents like bacterial indicators have a high ambient variability and therefore require longer monitoring time periods before a trend can be detected.

As mentioned previously, Regional Water Board staff are conducting water quality monitoring and assessment in development of an indicator bacteria TMDL for the Russian River within the Project area. In addition, in 2011 Regional Water Board's Surface Water Ambient Monitoring Program will conduct monitoring and assessment of nutrient/biostimulatory conditions within the Project area. Regional Water Board staff will make our data from these projects available to Water Agency staff for your use in preparing the Fish Flow Project EIR. In addition, Regional Water Board staff are available to work with Water Agency staff to design additional monitoring to support the preparation of the EIR. Finally, Regional Water Board staff are available to consult Water Agency staff on appropriate statistical analyses to conduct on relevant water quality data in order

G_NCRW-6

Comment Letter G_NCRW
Attachment

to meet the stated monitoring and assessment objectives of the 2010 Monitoring Plan.

Impacts to Estuary

The Project has the potential to cause elevated water levels within the Russian River estuary. The Fish Flow Project EIR should evaluate the potential for elevated water levels to inundate residential septic systems located near the estuary shore and cause system failures, which could lead to discharges in violation of the Basin Plan.

Though Regional Water Board staff recognize that this Project NOP does not address breaching of the barrier beach between the ocean and the Russian River estuary, we provide the following comments for your consideration. Past activities to artificially breach the barrier beach between the ocean and Russian River Estuary have been covered by a Clean Water Act Section 401 Certification (certification). The current certification (WDID No. 1B04001WNSO) and its amendment expire on December 31, 2010. On September 24, 2008, the National Marine Fisheries Service issued the Biological Opinion entitled "*Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River Watershed*," (File No. 151422SWR2000SR150).

A new certification will need to be applied for and issued for new methods of creating the outlet channel and breaching the estuary that will be more protective of salmonids and the estuarine habitat by providing deeper, cooler, and less saline water for improved rearing habitat for salmonids within the estuary. Flow will be a critical factor to evaluate and include within the certification application. Information on our certification program may be found on our website at: http://www.swrcb.ca.gov/northcoast/water_issues/programs/water_quality_certification.s html.

Concluding Comments

'Regional Water Board staff recognize the potential conflicts between compliance with the National Marine Fisheries Service Biological Opinion and the Basin Plan water quality standards that the Fish Flow Project poses. As summarized above, we are concerned that the Project may contribute to violations of some water quality standards that apply to the Project area. Further, Regional Water Board staff expect the Fish Flow Project EIR to include qualitative and quantitative (i.e. statistical) assessment of whether the Project will cause violations of water quality standards and to include appropriate measures, as necessary, to mitigate identified impacts to these water quality standards.

Comment Letter G_NCRW
Attachment

Regional Water Board staff are available to consult with Water Agency staff in identifying appropriate measures to mitigate potential water quality violations caused by the Project.

Again, we thank you for the opportunity to comment. We look forward to continuing to work with Water Agency staff on this Project in our efforts to protect water quality. If you have any questions regarding these comments, you may contact me or Matt St. John at (707) 570-3762 or MStJohn@waterboards.ca.gov.

Sincerely,

Catherine Kuhlman Executive Officer
101115_MSJ_FishFlowProject_EIRCommentLetter

cc:
Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812 Re: SCH No. 2010092087
Barbara Evoy, Division of Water Rights, State Water Resources Control Board, P.O. Box 2000, Sacramento, CA 95812

North Coast River Watch, Larry Hanson, February 14, 2011

G_NCRW-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project and other Water Agency operations, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_NCRW-2 The letter from the Regional Water Quality Control Board, dated November 15, 2011, as referenced in the comment is directed toward the Fish Habitat Flows and Water Rights Project, not the Draft EIR for the Estuary Management Project. The Draft EIR does not include an analysis of potential violation of water quality objectives associated with the Fish Habitat Flows and Water Rights Project because this is a separate project. The Draft EIR, Chapter 5.0, Cumulative Analysis, analyzes the potential environmental impacts of the Estuary Management Project in combination with the Fish Habitat Flows and Water Rights Project. For additional discussion, refer to Master **Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_NCRW-3 For a discussion regarding alternatives and costs, refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses.** CEQA does not require a full cost feasibility analysis.

G_NCRW-4 For a discussion of the selection, range, and evaluation of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2 Master Responses**. Final project approval will be made by the Water Agency Board of Supervisors based on full review of environmental considerations.

This comment is also concerned with the assertion that the Estuary Management Project will, with certainty, provide an additional 4,565 are-feet of storage (potential fish rearing habitat). This quantity was derived as part of the Draft EIR analysis based on a calculation of change in volume of water in the Estuary if water levels are maintained at 9 feet. This is not based on another estuary example, rather is calculated based on actual Russian River Estuary characteristics.

G_NCRW-5 Refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve

target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis.

G_NCRW-6 As described in general in Draft EIR Section 4.5, Fisheries and in detail under Impact 4.5.1 (page 4.5-19 et seq.), the ecological benefits of lagoon habitat for salmonids (and especially rearing steelhead) have been documented extensively. Please refer to Impact 4.4.1, Special-Status Plant and Animal Species, Marine Mammals, on page 4.4-69. Additionally, the Draft EIR evaluated the potential impacts on pinnipeds occupying the beach haulout site, as well as haulouts located within the mainstem of the Russian River Estuary. For this assessment, refer to Impact 4.4.8, Protected Marine Mammals, on page 4.4-79. With respect to predation, there is no substantial evidence to indicate that intrusive predation would be significantly altered as a result of the project. This predator/prey relationship already occurs, although for a shorter duration and predation is an ongoing survival cycle. This relationship is not addressed by CEQA criteria.

G_NCRW-7 "Construction" activities, namely operation of heavy machinery to create the lagoon outlet channel, is described in Draft EIR Chapter 2.0, Project Description, and is assumed to consist of one to two pieces of equipment on the beach for initial channel creation and up to eighteen maintenance events over a five month period. The resource analyses in Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures, include a discussion of impacts associated with channel creation.

A reasonable range of alternatives was evaluated based on the ability to achieve project objectives and minimize or avoid environmental impacts. As presented in Draft EIR Chapter 6.0, Alternatives Analysis, several of the other alternatives, including the Temporary Outlet Standpipe and Jetty Modification, are anticipated to incur equivalent or greater construction related impacts for implementation, and are therefore not environmental superior.

G_NCRW-8 The requested data related to estuary monitoring was provided to the commenter. No further comments have been submitted.

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RRWPC

Russian River Watershed Protection Committee

P.O. Box 501
Guerneville, CA 95446

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ESA
1425 N. McDowell Blvd. Suite 200
Petaluma, CA 94954
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Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403

February 14, 2011

Dear ESA and Ms. Martini-Lamb:

These comments are submitted on behalf of Russian River Watershed Protection Committee (RRWPC) on the *Russian River Estuary Management Project* and submitted by email before the 5 pm deadline on February 14, 2011.

Introduction:

RRWPC is a nonprofit public benefit organization incorporated in the State of California since 1980. Our supporters number approximately 1200 property and business owners, residents, recreationists, and other concerned citizens in the lower river area from Healdsburg to Jenner. We also have a great deal of support from many others who appreciate our advocacy on behalf of the Russian River.

RRWPC supporters and others utilize the Russian River for recreation and/or tourism, for fishing, swimming, for artistic expression, spiritual well being, for exercise and personal health of themselves, family, friends and pets, and for replenishment of health and energy needed to balance out the stresses of modern day life. Due to its proximity to Bay Area urban centers, the beautiful and peaceful lower Russian River is easy to access and allows a natural refuge from

everyday cares. Many of our supporters own properties in the lower river for their summer enjoyment, but reside and work in the greater Bay Area and beyond. Because of all this, they have a great interest in this proposed project.

We include with these comments an updated version of our scoping comments submitted last June 21, 2010. (ATTACHMENT #1) Since you are not required to respond to scoping comments, we are submitting the revised scoping comments with the request that you respond to the version enclosed. G_RRWPC-1

Throughout the DEIR, there is a great deal of repetition and contradiction. There are about 23 authors and contributors to this document, but there appeared to be a great deal of inconsistency. The document frequently lacked adequate numeric data and other evidence supporting a wide range of assertions about the impacts (or lack of impacts) that would occur. Annual numeric averages were often inappropriately used where project period averages should have been. In some cases, we had access to the same SCWA data (not available in DEIR) utilized by consultants concerning breaching activities, river flows, and mouth closures. (Breaching information provided in document, but not by date.) The conclusions drawn and statements made did not consistently match our own analysis. Finally, in many sections, references were extremely sparse. We will go into these allegations in more detail as we get to the specific sections covered. G_RRWPC-2

Return to "natural" flows....

There is frequent reference in the Biological Opinion (BO) to restoring flows to their "natural" state, ostensibly meaning pre-dam flows of approximately 100 years ago. Truth is, when something needs to get fixed, it must be done in the context of the current situation, not one that existed so long ago. What would be the definition of "natural" by today's standards?

In their desire to claim the return to natural conditions, assuming it is a good thing, there is no discussion of the various manmade and other alterations that have occurred over the last 100 years, nor the necessary acclimation of species to those changed conditions. If plant and animal species have acclimated, what impacts might arise for them by turning time backwards with low flow? Have any species been extirpated or decimated over that time as a result of the changes? Have new ones been introduced (Ludwigia for instance)? Please provide a list of other lower river plant and animal species lost in that time, as well as new ones replacing them. G_RRWPC-3

In its reference to "natural" conditions, the BO avoids the issues of temperature, bacteriological, and nutrient pollution that prevails in much of the lower Russian River watershed (Forestville to Duncans Mills), and becomes greatly exacerbated in low flow circumstances or it refers to those conditions as natural if they are not currently listed on 303(d) and supportive of beneficial uses. In fact, there is really G_RRWPC-4

no concrete evidence provided that the lower river went down to 25 cfs as they claim, or if it did, when, where, how often this occurred?) Rather we have concrete evidence that appears to prove the opposite. G_RRWPC-4 cont.

It is likely that before the dams, summer flows in the lower river were lower in places in August and September, but there were large, deep pools (now mostly filled in with sediment) that served as swimming areas. There were also summer dams backing up water for swimming.

Assuming that pre-dam standards are to be partially implemented for flow, can you please provide a description of the environment and recreation on the lower Russian River at the early part of the 20th Century? Why were no local historians consulted about pre-dam flow conditions? What were natural conditions (depths) in the Estuary pre-dams? Is it justified to declare the restoration of so-called, but not scientifically defined "natural" conditions in one place and not another? The term "natural conditions" has been used excessively through out the document wherever a case is being made to not scientifically study a specific condition. G_RRWPC-5

How much degradation has occurred over the last 100 years? In terms of fish habitat, what has been the impact of the loss of massive amounts of riparian vegetation, the addition of many, many chemical and biological pollutants, the impacts of gravel mining, the filling of deep pools with fine sediments especially by timber harvest activities, the greatly increased river and tributary temperatures, the extensive draw down of tributary flows by agriculture, and on and on and on? How is the restoration of so-called "natural" flows going to work in the face of the loss of these other **natural** habitats? G_RRWPC-6

Furthermore, the BO asserts that the recommended low flow of 70 cfs only partially meets the "natural" flows of what was formally 35 cfs (or 25 cfs as stated in some places). No compelling evidence was provided indicating that this was the historical condition in all parts of the lower river and which months it occurred. (There is a vast difference between May flows and October flows before the rainy season begins in all years of record.) Why is no differentiation made during various months of the project time period (May 15-Oct.15)? Would Estuary management towards the end of the period be the same as the beginning? How would they differ? G_RRWPC-7

How does low flow impact degraded conditions between May 15th and October 15th, which is the term of the project, especially considering that flows are usually much higher in the early spring and temperature lower, and there can be a G_RRWPC-8 significant difference in impacts? In addition, if the river closes in May and the barrier constructed to maintain a closed mouth all summer, what would happen G_RRWPC-9 to the down-migrating juvenile Chinook in May and June? Can you provide information on impacts of low flow on both conventional pollutants and toxic ones (since low flow will be a reality because of TUCP: see next section for G_RRWPC-10

discussion)? Can you provide average flows at Hacienda for each of the months of concern and correlate to average levels in Jenner at that time over the last 14 years? Can you compare the historical Hacienda flow data to the times when the mouth was open or closed? G_RRWPC-10 cont.

Furthermore, both the DEIR and BO allude to the river as one uniform entity and fail to acknowledge that different reaches of the river may react differently according to the unique conditions of the various segments. Specifically, the DEIR needs to differentiate low flow's exacerbation of pollution (i.e., bacteriological problems, temperature, dissolved oxygen and nutrients) in the lower river. Can you differentiate conditions between Duncans Mills, Monte Rio, Vacation Beach, Guerneville, Oddfellows, Steelhead Beach, and Hacienda Flow differences exist in the different areas along with varying levels of water quality. Since the closed mouth impacts as far upstream as Vacation Beach, impacts to the lower reach in particular needs to be addressed. (Just recently, Steve Baxman, of the Monte Rio Fire District said that the river at Monte Rio could gain 3-4 feet when the river closes. He also expressed concern that the flow slows and the water stagnates. What would be the impacts on water quality and public safety in that case?) G_RRWPC-11

RRWPC recently viewed a collection of picture postcards from the first half of the 20th Century belonging to John Schubert of the Russian River Historical Society. He kindly allowed us to copy some and we include a few here. (ATTACHMENT #2) We have access to numerous others if necessary. G_RRWPC-12

The characterization by the BO that the river pre-dam flowed at about 25 cfs, just doesn't seem to hold true, unless there was a period after summer dams were taken down and before the rains began, in some locations, where flows became quite sparse in October when dams came down and the recreation season ended. But to convey the image that there was no water in the river, simply does not hold up. It is also significant that there were many pictures of boats and canoes, a few quite substantial in size.

There were 3 summer dams between Oddfellows and just upstream of Monte Rio. All the pictures I saw downstream of Monte Rio had water in them. The river also looked like it may have been broader and more spread out between Forestville and Monte Rio than it is now. Perhaps the flow was 25 cfs in places like Alexander Valley. Maybe the flow was 25 cfs during brief periods after the recreation season in the lower river, before the winter rains, but to imply that the river flowed at 25 cfs all summer, just doesn't seem to be realistic. G_RRWPC-13

Finally, it is important to note that in the 14 years from 1996 to 2009, the mouth closed for the first time in May only five times. It closed for first time in June, 8 times, July, 2 times, and August, 4 times. It is conceivable, and has happened, that it closes for the first time during the management period in late September G_RRWPC-14

or early October, which in some years will leave only a few weeks to do the project. The odds of this working juxtaposed against the costs of the program aren't very good here. The effort is huge and the gains may be small. Might there not be some better ways to allocate limited fishery resources? G_RRWPC-14 cont.

Estuary Project improperly bifurcated from *"Fish Habitat Flows and Water Rights Project"* (Fish Flow Project)

The purpose of both the Estuary Project and the Fish Flow Project is to fulfill requirements of the Biological Opinion (BO), which has the authority of federal law. The document refers to high flows resulting in water velocities that damage salmonid habitat in the upper river and in Dry Creek (page 243) but noticeably does not mention that high flows in the lower river cause a similar problem. It states (page 243), *"Changes to the D1610 flow minimum requirements will enable alternative flow management scenarios that would increase available rearing habitat in Dry Creek and the upper Russian River, and it would provide a lower, closer to natural inflow to the estuary between late spring and early fall, thereby enhancing the potential for maintaining a seasonal, freshwater lagoon that would likely support increased production of juvenile steelhead and salmon."* G_RRWPC-15

The BO also states on page 243, *"Relatively high discharge also disrupts the normal processes of lagoon formation in the Russian River estuary, thereby exacerbating the potential for flooding of low-lying properties, and increasing the frequency of mechanical sandbar breaching."* The numbers we have seen on Hacienda flows and river mouth closing do not seem to bare this statement out. Why not provide data correlating actual flows at Hacienda with breaching events? G_RRWPC-16

It is because of the supposed relationship between "relatively high discharge" (i.e., 125 cfs) and maintenance of the open mouth most summers that the BO calls for reduction of flows at Hacienda from 125 cfs to 70 or 80 cfs. Yet in May through July, flows tend to be much higher than 125 cfs because of runoff, which cannot be controlled. On what basis was it determined that the precise minimum flow of 125 cfs was to blame for the flooding problem?

On page 244 the BO states: *"Artificially high inflows during summer months interfere with normal processes that discharge river flow through or over the barrier beach to the ocean."* And on same page, *"The D1610 minimum requirement of 125 cfs at Guerneville during normal water years is much higher than the unregulated conditions that existed prior to construction of Lake Pillsbury and Lake Mendocino. Because of the dynamics of lagoon formation are dependent on several variables, including freshwater inflow, wave conditions, the quantity and quality of available sediment supply, and underlying geologic structure at the river's mouth, it is not possible to specify any one single inflow requirement that will promote lagoon formation. However, a lower flow requirement would promote long term closure of the lagoon."* G_RRWPC-17

How would flow promote long-term closure in light of these other factors? How does flow interrelate to each of these other factors? Is this an unsubstantiated conclusion? Why are there no actual numbers correlating Hacienda flow and mouth openings and closures? Why is there no analysis of actual river flows at Hacienda?

These passages above appear to solidify the close association of the changes to D1610 and the Estuary Project in the minds of the authors of the BO. In addition the BO requires that annual appeal be made to the State Board to lower those flows on a temporary basis as discussed in more detail further on. RRWPC believes that the Fish Flow Project (FFP) is inexorably linked to the Estuary Project through the BO and both should be integrated into one combined environmental review. As the BO mandates specific changes to D1610, we cannot assume otherwise for all intentional purposes of this DEIR. G_RRWPC-17 cont.

Alternatively, we believe that the need for proposed changes to D1610 at Hacienda has not been demonstrated and should be dropped altogether. In lieu of that, both projects must be studied together. Also see Mike Lozeau's comments on behalf of RRWPC.

For the following additional reasons, we believe that the two environmental review processes are closely linked and should be reviewed simultaneously:

- The Fish Flow Project's proposed minimum flow changes at Hacienda from 125 cubic feet per second (cfs) to 70 cfs has no other stated purpose (in the BO) than the prevention of flooding in Jenner when the mouth is closed and the lagoon rises to a level of 9′ or higher (between May 15 and October 15 of each year). There is no mention of minimum flows in the lower river for the sake of providing fish habitat between Forestville and Duncans Mills and there was very little valid water quality data collected and analyzed in that reach. The DEIR avoids all but very cursory analysis of impacts east of Duncans Mills, even though flows can back up from the Estuary all the way to Vacation Beach, one mile west of Guerneville and about 7 miles upstream of Duncans Mills. G_RRWPC-18

- The DEIR attempts to divorce these two issues, making a case in effect that changes to D1610 for the sake of this project may not be necessary. (Page 3-4 of DEIR states: "*…closure events due to barrier beach formation have occurred over a wide range of flow conditions. During the lagoon management period, the outlet channel would he expected to perform over a range of flow conditions that could be experienced from May to October. As such, <u>the Estuary Management Project is not reliant on temporary or permanent changes to D1610 for its implementation</u>. Rather, the Estuary Management Project has been developed to adaptively manage the Estuary under any likely range of flow conditions following barrier beach formation under varying hydrologic year types and conditions.*" (Emphasis added) G_RRWPC-19

But then on page 5-11, the DEIR states, "*….reduction in summer flows would likely increase the number of closure events occurring during the lagoon management period.*" The term "likely" is supposition and needs to be backed up with evidence. Also, do you mean the length of time the river is closed or the number of times that the river is closed? G_RRWPC-19 cont.

The DEIR addresses the Fish Flow Project (FFP), which includes "low flow" in the Cumulative Analysis section of the Estuary Project DEIR (pages 5-7 to 5-14). The DEIR justifies bifurcation on the basis that the Biological Opinion contains a series of actions to be undertaken by SCWA, and (page 5-7) that, "*The Estuary Management Plan Project provides independent utility (i.e., must be implemented to achieve a purpose irrespective of other RRIFR elements) in achieving these goals and necessitates implementation separately from other RRIFR Program elements in order to meet the objectives and schedule in the Russian River Biological Opinion. The Lagoon outlet channel will be designed to increase the extent of freshwater retention in the Estuary under the range of inflow conditions that have been historically recorded.*" Yet BO and DEIR clearly claim connections of the two issues, flooding of Jenner properties and river mouth closure. G_RRWPC-20

This will only occur with breaching (which would undermine the goal of the project) since historic flows have been recorded as high as 1200 cfs during the project period. The stand-alone nature of this project does not seem feasible with such a wide range of uncontrollable "historic" flow scenarios. (The Temporary Urgency Change Order authorized 70 cfs at Hacienda, but flows averaged about 260 cfs throughout the 2010 summer. As stated, historic flows at Hacienda from May 15th through October 15th have been higher than 1200 cfs on a few occasions.)

In other words, we question whether adjustments to D1610, at least for the lower river, is merely to satisfy requirements in the BO, and not because they are inherently necessary? In fact, the evidence provided in this DEIR appears to challenge the necessity for flow changes at Hacienda. G_RRWPC-21

The DEIR goes on to state that those observed flow conditions range from 71 cfs to 1200 cfs at the Guerneville Gauge (at Hacienda Bridge). They conclude that the Estuary Management Project is, "D1610 neutral" (page 5-11). While the mouth closed a few weeks later on September 7, 2009, it is notable that even with those extremely low flows in August, the river mouth remained open for over a month. Does the 71 cfs only represent the low flow at the time of closure events? If so, it was characterized in a misleading way since there were much lower flows in 2009 during which the river did not close at all. G_RRWPC-22

Doesn't use of the number, 71 cfs convey the impression that SCWA operations are staying within the perimeters of the BO minimum flow G_RRWPC-23

recommendations? RRWPC produced a 2009 Photo Report of all the nutrient pollution that year which is attached to these comments. (ATTACHMENT #3) The water quality problems easily observed in photographs taken over that summer speak for themselves. G_RRWPC-23 cont.

- That the BO requires SCWA to apply to the State Water Board for Temporary Urgency Change Petitions every year, for which there is no environmental review, speaks to the fact that changes to D1610 are de facto occurring anyway, even before this Estuary Project is approved and authorized, and even before permits from multiple agencies are obtained for construction of channel and barrier. Ironically, releases from the dams were lowered last year as required by the BO, but even so, flows at Hacienda remained at an average of 263 cfs for the entire management period in 2010. Along with the lack of closure during some very low flows mentioned above, this indicates that the river is clearly a secondary player affecting Estuary conditions.
- It appears contradictory that NMFS wrote a letter to the State Board on July 22, 2004, in regard to the Temporary Urgency Change Petition for lower flows that year, and stated, "*One fine point we would like to raise is our concern about the frequency of these emergency actions to reduce flows in the Russian River. This would be the second time in three years. Developmental growth in the Russian River watershed places additional pressures on our finite water supply that supports agricultural irrigation, municipal use, recreation, and environmental resources. With the reduction of diversions from the Eel River and increased water consumption, competition for water will only intensify within the Russian River Valley. Flows for the conservation and recovery of salmon and steelhead will continue to be an important factor in decisions regarding water management in this river system.*" G_RRWPC-24
- Furthermore, it is interesting that Dick Butler of NMFS submitted a letter into the Scoping record for this project stating: "*NMFS staff attended recent public CEQA scoping meetings for the Estuary Project. However, in these meetings it was unclear as to what extent the Estuary Project EIR will address the effects of summer stream flow changes that will support the Estuary's goal of maintaining a close estuary (lagoon) during summer months. We believe that it is reasonable that the EIR for the Estuary Project consider the effects of flow changes associated with interim flow changes (associated with the TUC petitions) and use existing information to address the effects of these interim changes on the environment and resources such as recreational boating.*" This topic is partially addressed in the Cumulative Impacts Section, but in vastly inadequate detail. There is no immediate "urgency" with these petitions that justifies abrogation of environmental review. It's rather moot in a wet year anyway when flows run much higher than those called for. G_RRWPC-25

- New breaching permits are currently required from multiple agencies, including the North Coast Regional Water Quality Control Board (Regional Board). We have recently learned that most permits, including from the Regional Board, have been extended for one year to allow the Agency to complete EIR process and have one more season at attempting to do the project. The final EIR should be done in June and they hope to certify document and commence project this summer. Actually, they commenced project last summer, before they did environmental review. On what basis did you justify starting the project before environmental review complete? If litigation should occur on this document, would the project proceed anyway? G_RRWPC-26
- Why is there no NEPA review of this project? G_RRWPC-27

Hydrology and flooding (4.2)….

This section both tries to prove that low flows aren't necessary to operate the project, which they determine is D1610 "neutral" (page 5-11) "*….and not reliant on the implementation of either temporary or permanent changes to D1610.*" Yet at the same time (and page) they state, "*…reduction in summer flows would likely increase the number of closure events occurring during the lagoon management period.*" Where is the data to prove this? G_RRWPC-28

As we will point out, potential negative impacts to the lower river not adequately addressed in this DEIR, (put off for the D1610 subsequent DEIR) may have deleterious impacts on water quality in the lower river, which ultimately may harm the very fish they are trying to save. (Please see ATTACHMENT #3: At the same time, this document comes to rather ambiguous and poorly substantiated conclusions on how low flow is not really necessary, but it would probably allow for longer mouth closures than otherwise. Page 4.2-15 says, "*….the duration over which the surface target water level will be maintained would likely increase as a result of implementing the Estuary Management Project.*" The word "likely" indicates a high level of uncertainty. Scientific evaluation would be much preferred. G_RRWPC-29

This DEIR provides confusing data on flow by averaging "annual daily flow" over a 25-year period as they did in Table 4-2.1. What point is being demonstrated in this chart? Since this DEIR is intended to describe a range of conditions existing between May 15th and October 15th, what is the value of an annual average of daily flows for a 25-year period? It is misleading. G_RRWPC-30

What would be more valuable would be a thorough discussion of the range of weather scenarios and project period flows, depending on weather conditions of the previous fall, winter, and spring. 2009 and 2010 provide significant contrasts between wet and dry summers and seemingly pertinent to the success of this

project. Combining this information with natural mouth closures would have been especially useful. Why was this not done? G_RRWPC-30 cont.

The Biological Opinion assumes that if flows are lowered at the Hacienda Bridge from 125 cfs to 70 or (80) cfs, there is the likelihood that the mouth of the river will either close sooner or remain closed longer than with the higher flows. Yet why is there no statistical analysis showing the relationship of Hacienda flows at different times in the project period, versus natural historical closings in the past. Does such a relationship exist? We looked at some of the data.

The year 2009 was the third year in a row of sparse rain. It was considered a drought year and extra measures were taken to conserve water and maintain reservoir levels. Luckily we had a cool summer and SCWA was able to maintain adequate levels in the reservoirs for the fall run of Chinook. Urban water users also made significant efforts at saving water at the behest of water wholesalers and retailers.

Even with drought conditions, average daily flows at Hacienda in June, 2009, were 183 cfs, in July were 95 cfs, in August were 63 cfs (with a low of 47 cfs), and in September, 80 cfs. If one took an average for all months, it would come to about 124 cfs and would not reflect that there were **31 days in the four-month period where flows fell below 70 cfs**. How can SCWA operate with a buffer of 80 cfs or even meet the promised 70 cfs when they have no way of controlling all flows?

G_RRWPC-31

Even though this DEIR said (page 3-3) "*Review of flow data for the 119 closure events occurring between 1996 and 2009 indicated a median flow at the USGS Guerneville Gage at the time of these closure events of 250 cubic feet per second (cfs), with a minimum flow of 71 cfs and a maximum flow of 1120 cfs. Therefore, closure events due to barrier beach formation have occurred over a wide range of flow conditions. During the lagoon management period, the outlet channel would be expected to perform over the range of flow conditions that could be experienced between May to October.*" Median flows can be very misleading; why was mean flow not provided?

What is missed in the presentation of this data is the fact that when the flows were the lowest at Hacienda, the river mouth remained open. Please explain why closures supposedly occur over a large range of flow conditions, but the Biological Opinion expects that low flows will help sustain the closed estuary? Can you provide more detailed statistical evidence to back up your claims?

We also question the conclusion about September flows averaging 178 cfs over the last 70 years. This is meaningless data because so much has changed in the last 60 years in terms of water use. Averaging the last ten years would be far more meaningful. Also, in the last ten years, natural closures in the study period have been far less numerous. For instance, in the 14 years from 1996 to 2009, there were five natural closings in May 8 in June, and 2 in July (only 15 natural closures in 14 years during the first half of the project period).

Why not study flow conditions on dates right before closure to get a handle on river conditions before it occurs to determine whether and when low flows are even helping the situation? (This document argues both sides of the case in regards to whether low flow is necessary or unnecessary to this project. Assuming that these early closings are the most important for this project as they allow more time for steelhead to live in fresh water conditions, why was this not considered?)

What is not known, and not discussed, is the question of how lowering minimum flows at Hacienda would impact (lower) natural flows coming from the tributaries in the spring. There is an assumption that SCWA actually has control over the flows through their releases, but that is not the case at Hacienda. So what is the value of "minimum flows" in May and June when there is still natural water in the system? Also, how does that impact the out-migration of juvenile Chinook in May and June?

G_RRWPC-31 cont.

Water Quality (4.3)….

Nutrients…

The DEIR draws the conclusion that because the lower river is not listed under the 303(d) section of the Clean Water Act as impaired for nutrients and dissolved oxygen, beneficial uses are supported. Specifically it states on page 4.3-5, "*However, the main stem of the Russian River, including the Estuary, is not listed as impaired for these constituents. Therefore, the background concentrations of these constituents in the Estuary are considered indicators of the current conditions of the Estuary that support the beneficial uses identified in the RWQCB Basin Plan for the Lower Russian River, including aquatic habitat and recreation.*"

In the Basin Plan (2001 version) on page 3-3.00 under Basin Plan Objectives: Biostimulatory Substances it states, "*Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growths cause nuisance or adversely affect beneficial uses.*" In their comments on the Fish Flow Project, Regional Board indicated that biostimulatory substances include nitrogen and phosphorus. (ATTACHMENT #4)

RRWPC has documented extensive algae blooms in the Vacation Beach, Monte Rio, and Ville Grande areas as well as further upstream. We have submitted this information (mostly pictures) to the State in the form of our request for listing in the 2012 303(d) listing process. (We were not able to watch for nutrients and/or take pictures at the Estuary on a regular basis since we live too far away.) We submit our comments on the 2012 303(d) with some of our 2010 pictures. (ATTACHMENT #5) We also submit our 2009 Photo Report (ATTACHMENT #3)

G_RRWPC-32

These are clear instances in the lower Russian River where biostimulatory substances have caused nuisance growth. The situation has been serious enough, even considering serious budgetary constraints, that with the prospect of "low flow" on the horizon, and considering that SCWA 2009 nutrient monitoring was considered unsatisfactory, the Regional Board has established a nutrient monitoring program for this summer (2011) in the lower Russian River. One river location they sampled last year tested positive for toxic blue green algae caused further concern. Conditions currently exist in terms of excessive nutrient pollution to justify such an investigation. During low flow, and with high water and air temperatures, besides heavy nutrients, circumstances for toxic algae growth are prime in the lower river. How might the presence of blue green algae affect this project, especially if low flow exacerbated it? Does blue green algae impact the fish? G_RRWPC-32 cont.

The Regional Water Board's standard is a narrative one, and compliance may not be easy to accomplish if the problem is allowed to mushroom. How can monitoring be established to assure that no toxic algal blooms occur (rather than waiting until it is widespread)? This is an instance where an ounce of prevention is worth a pound of cure.

In regards to listing nutrients on the 303(d) list, Regional Board Scoping Comments on the Fish Flow Project (D1610) states in November 15, 2010 comment letter, (page 2) "*State Water Board staff have begun assessing available data in order to update the 303(d) List. State Water Board staff's assessment includes nutrient and algal biomass date collected within the Project area and submitted by interested parties. At a later date, Regional Water Board staff will consider whether the available data demonstrates that the Russian River within the Project area is impaired for nutrients/biostimulatory substances.*" ("Comments on the Notice of Preparation of an EIR for the Fish Habitat Flows and Water Rights Project, SVH No. 2010092087: ATTACHMENT #4) G_RRWPC-33

If nutrients are listed on the 2012 303(d) List, how will this impact the Estuary Project? What kinds of measures might be implemented if nutrients are more of a problem during closed conditions than open? What kinds of mitigations might be implemented (other than over-riding considerations) to control this problem? How might this interact with nutrient conditions upstream? If low flow is implemented, nutrient pollution gets worse, and higher levels are found in the Estuary, how will this impact the steelhead? Is it possible that such a listing could require cessation of the project and/or changes to D1610? G_RRWPC-34

In a related issue, the invasive plant: Ludwigia is proliferating in the Russian River, including the lower reach. This is a plant that has proved virtually indestructible in the Laguna de Santa Rosa, major tributary to the Russian River. Millions of dollars have been spent attempting to eradicate it, to no avail. Once removed, it returns with a vengeance. Numerous segments of the Laguna are no G_RRWPC-35

longer navigable. There is a strong connection between low and slow flows, heat, sunlight, minimal riparian cover, and excessive nutrients that strongly feed this monster plant and is causing great concern. It is also a plant that harbors West Nile Virus and other pathogens which is of great concern for those using the river for recreation. G_RRWPC-35 cont.

Ludwigia occurs up and down the lower river and is especially prevalent during low flows. Up to now river flows have kept it somewhat at bay in the main channel. If flows are lowered, how can it be kept from choking the river?

The DEIR (page 4.3-5) mentions that there are currently no numeric criteria for nutrients in saltwater bodies, only fresh. The USEPA's current desired goal for total nitrogen in fresh water is 0.38 mg/L. There are frequent exceedances at Bridgehaven and Jenner stations (high values of 0.58 mg/L and 0.75 mg/L respectively). These elevated levels occurred during both open and closed conditions of the Estuary. It is confusing that the DEIR states these values only apply to fresh water. Do Bridgehaven and Jenner station locations contain predominantly fresh water or are you just providing the information as a basis for comparison? G_RRWPC-36

Elevated nitrogen levels were mostly seen to occur when spring flows caused water levels to be higher. What are the water levels at which these various exceedances occurred? If the goal is to maintain an estuary holding more water, how will excessive nutrients be dealt with so as to not cause nuisance conditions?

Of even greater concern was the statement that, "*Total phosphorus concentrations exceeded the USEPA criteria a majority of the time during both open and closed conditions at all stations in the Estuary, including the Monte Rio station.*" USEPA's desired criteria for phosphorus is 0.022 mg/L and samples ranged from 0.021 mg/L and 0.077 mg/L. Phosphorus is considered a limiting nutrient. When it is in large supply, the opportunities for excessive plant growth are increased. Some of the worse algal blooms in 2009 and 2010 were in the Monte Rio and Ville Grande areas. What impact would excessive phosphorus have on the upper and lower estuary? What impact would low, slow moving water have on the transmittal of phosphorus? G_RRWPC-37

Has anyone considered the contribution of Russian River County Sanitation District (RRCSD) discharges to nitrogen and phosphorus levels? They stop discharging on May 15th, but what is the likelihood that phosphorus gets bound up in the sediments and then re-released into the waterway? We ask this question because we noticed a straight line of Ludwigia growth from about the location of the RRCSD discharge location for a block or so downstream. We wonder if there is a connection here? G_RRWPC-38

What impact would higher nutrient levels have on steelhead and other species in the Estuary during closed conditions? What is the expectation of nutrient and pathogen levels increasing and accumulating during a long-term closure period? G_RRWPC-39

Why was no nutrient data presented for 2009? Why were water and air temperatures not mentioned as a factor in algal growth? What were comparative temperatures, and could low temperatures explain a lack of algal blooms in the Estuary?

Chlorophyll a levels were lower in the upper estuary and higher in the lower. The DEIR faults "conditions" in Willow Creek for this problem but does not cite what conditions (p.4.3-6) were to blame. What were those conditions? Why is Chlorophyll a higher in the lower estuary, but not in the upper, even though phosphorus was elevated in both? What is the connection between Chlorophyll a and/or nitrogen and phosphorus?

It is disappointing that there is no data for 2009 because that year stands in high contrast to 2010 and it would have been interesting to compare nutrient results. 2009 was a drought year and flows were low everywhere, even though the mouth didn't close until September 7th when it stayed closed for 30 days. (Flows at Hacienda averaged 63 cfs in August, 2009.) In 2010, flows were much higher in the Russian River all summer due to a wet winter and spring and a cool summer. (Summer of 2009 was cool also, even though much less water was available. That probably saved the day, pollution wise.)

G_RRWPC-40

The Regional Board letter on Fish Flow Project states (page 5), "*We believe that the assessment of changes in water quality should involve statistical analysis. Statistical analysis of water quality data for trends often requires an adequate time period to detect a statistical change in constituent concentration. The amount of time required to detect a trend is dependent on the sample variability. Constituents like bacterial indicators have a high ambient variability and therefore require longer monitoring time periods before a trend can be detected.*"

To the EIR's credit, Impact 4.3.3 (page 4.3-20) admits: "*The change in barrier beach breaching operations during the lagoon management period could adversely affect the water quality due to increased nutrient or indicator bacteria levels in the Estuary. (Significant and unavoidable)*"

It's highly unlikely that the Regional Board would accept such an assessment as adequate in regards to meeting water quality requirements. Some kind of mitigation would have to take place. It is unacceptable that polluting circumstances be allowed to continue on a permanent basis without any attempt to remediate. What types of remediation might be considered here? How can it help the steelhead to have a closed lagoon with fresh water filled with warm, nutrient rich and bacteriologically degraded water? What if the possibility that the "No Project" alternative might end up the preferred and environmentally superior one also?

Another critical statement about water quality and the Estuary on page 4.3-20 is: "*The Estuary Management Project is proposed in order to provide a more natural set of habitat conditions for juvenile salmonids. However, adverse water quality conditions*

G_RRWPC-41

have occurred as part of the natural physical processes of the Russian River Estuary under existing conditions, and may occur in the future both with, and without, implementation of the Estuary Management Project."

Again, this statement avoids consideration of impacts of the project by alluding to them as natural, without a shred of evidence that this is indeed the case. (Please see Michael Lozeau letter on this.) In truth, this document is bumping up against the consequences of segmenting this project from the Fish Flow Project, which may at some point address a broader range of issues affecting this total water body. In the early pages of our comments we allude to the deterioration of water quality by a whole assortment of human uses causing wide spread degradation of our waterway. Nature is out of balance in the Russian River and the Estuary is the bottom sink for all this abuse. G_RRWPC-41 cont.

We suggest that either you provide extensive evidence of "natural circumstances" or "existing conditions" or you eliminate those phrases from this document. It is simply a convenient excuse not to provide back up information to substantiate your claim and it's used far too frequently. Furthermore, we suggest that for every unavoidable and significant impact, mitigations be spelled out. It is reprehensible that for such a complex project, where so little is known about most impacts, there is also so little accomplished in the way of spelling out anticipated studies that will be necessary.

Indicator Bacteria….

The statement is made in the DEIR (page 4.3-8) that, "*In 2009, total coliform counts were observed to be higher during open conditions in mid-summer than during closed conditions, including the 29-day extended closure at the end of the management season.*"

In 2010, the reverse was found to be true. They speculate that, "*….higher counts in 2010 may be attributable to increased inputs of flow into the Estuary at the end of September into early October. Indicator bacteria levels were observed to increase at all stations a the end of September and during the repeated closures in early October.*"

At the end of the 2010 summer season, the Army Corps of Engineers determined that there was too much water in the dams for the fall season. The reservoirs needed to be lowered to prepare for the winter rains and for flood prevention in the rest of the watershed. Apparently there was a major release over a one or two week period. Did that situation coincide with increased levels of bacteria in the Estuary? If so, is it possible that the higher flows accumulated coliform on the way downstream and deposited it in the Estuary? G_RRWPC-42

This section of the DEIR acknowledges that indicator bacteria have many sources. The primary impact on the lower watershed from bacterial contamination is on human use including recreation. Yet fish are affected by bacterial infections and can infect humans if the fish are eaten. Why is no

mention made of this issue? How might changed Estuary conditions exacerbate this problem, if it exists? What conditions in the Estuary might encourage bacteriological growth? What impact on steelhead abundance might be affected by elevated by high bacteria counts? What impact might extended closures have on elevated bacteria levels?

On page 4.3-23 the statement is made that "*…there is insufficient information to definitively conclude whether the adaptive management program would result in a increase, decrease, or no substantial adverse effect on nutrient or bacteria levels within the Estuary. However, there is evidence to suggest that water quality conditions in the Estuary could be reduced following late summer or early fall increases in flow inputs into the Estuary, and that residence time within the Estuary would be increased compared to existing conditions experienced.*"

On the same page, it continues, "*The Estuary Management Project is proposed in order to provide a more natural set of habitat conditions for juvenile salmonids. However, adverse water quality conditions have occurred as part of the natural physical processes of the Russian River Estuary under existing conditions, and may occur in the future both with, and without, implementation of the Estuary Management Project.*" G_RRWPC-42 cont.

It further concludes that, "*…it is anticipated that conditions would remain within the range of those experienced within the Estuary over the past 15 years, although the duration of those conditions during the lagoon management period would likely be increased. Additional monitoring and continual updating of the Adaptive Management Plan with the best information available would be required. Therefore, in the absence of technical certainty, this EIR concludes that the proposed project would have the potential to result in significant and unavoidable impacts to water quality related to bacterial and nutrient levels in the Estuary.*"

What we have here is another circumstance that assumes that since things have been bad before, it's okay if they stay the same and/or become worse now. If that's not the proper interpretation, please explain what you mean. Why is so little specific data or scientific studies on nutrients and bacteria presented to substantiate these conclusions? After you have concluded that problems would remain with excessive nutrients, bacteria, and other contaminants, how, can you conclude that the project will provide more "natural conditions" for the steelhead? Specifically, what was the range of conditions over the last 15 years? What would be the impacts of increased duration of negative conditions?

Also, since when does CEQA allow future monitoring as mitigation for proposed activities that have unknown consequences?

What kind of monitoring can be anticipated? For instance, where is the discussion of toxics and emerging contaminants? It is likely that in a few years, increased monitoring for many different constituents is likely to make this project infeasible. The Estuary is a sink for all kinds of pollutants, but it appears that only the upper layer of habitat is being valued and more adequately G_RRWPC-43

considered. Why does this document seem to pretend that toxins don't exist? Why aren't fish tissue samples being studied to determine the condition and viability of the fish? In fact, what specific criteria will be used to determine if this experiment is a success or failure? At what point will this experiment end if the latter situation occurs? G_RRWPC-43 cont.

Why is there no discussion of heavy metals? Mercury and copper are of particular concern. Was any testing of heavy metals done in the Estuary? Have any fish samples been taken to determine if fish are bioaccumulating these toxins? G_RRWPC-44

What good is it if the Estuary has more fresh water and a lagoon environment if the water is polluted? Also, if the fresh water is only six to ten feet deep, what's to keep the birds from eating the fish? What mitigations can adjust for this problem? G_RRWPC-45

Temperature…..

The Russian River is listed as impaired for temperature. We have extensive data on Johnson's Beach and all summer long temperatures average about 23C. (I don't have degree symbol and will write temperature as I have it here, with C for Celsius.) On page 4.5-10 the EIR states that according to Peter Moyle, fisheries expert, temperatures of 24 to 27C, except for very short periods, are lethal for steelhead. So what impact will low flow have on this situation? Are over heated waters upstream causing downstream waters to heat up?

In the Estuary, the cooler waters tend to be the ones with low DO. The surface water in the summer is more likely to be heated up. Graphs on page 3-28 show temperatures during the 2009 mouth-closing event. September 26, 2009, almost three weeks after closure, showed the highest temperatures. (23C range) Temperatures at Johnson's Beach on that date, and a few days before, averaged around 19C. Why would the water temperature at the coast, where it tends to be much cooler, be about four degrees higher than temperature inland? G_RRWPC-46

We will just comment on the conclusion on page 4.6-22: "*…it remains unclear whether the proposed project would result in a highly productive freshwater lagoon system during the lagoon management period, or whether the less productive and potentially adverse conditions characteristic of a partially converted stratified lagoon would predominantly occur.*"

It goes on, "*A partially converted lagoon could potentially impact resident fish species, especially rearing steelhead, due to a reduction of water quality and habitat function, leading to increased stress or mortality as a result of increased water temperatures, reduced dissolved oxygen levels, or reduced foraging potential due to loss of estuarine productivity. A reduction in productivity or habitat function within the Estuary could result in a further potential indirect impact related to increased competition in unaffected*

areas where suitable habitat persists. Additionally, stratification could result in a reduction in the total area of available suitable habitat for a range of fish species due to adverse water quality conditions in the lower water column."

And this is just in the Estuary. Who knows how bad the devastation will be from both low flow and a lagoon that backs up the river for 14 miles adding 725 AF to the river between Austin Creek and Vacation Beach? How can so many negative impacts be identified in an EIR and have the project still move forward? Even more problematic is, how can so little scientific data be available with which to determine potential impacts of a project, and have it still move forward? Finally, how can so little monitoring be proposed for a project that contains so many unknowns? G_RRWPC-46 cont.

Fisheries (4.5)…..

We are a bit confused as to why Chinook have been left out of consideration of this study, and wonder if opportunities for mitigation were missed by that decision? Page 4.5-11 states, "*Fall-run adult salmon migrate from the ocean to spawn in the main channels of rivers and large tributaries in late summer and fall, and die soon after spawning.*" This species is adapted to migrate to avoid warm summer temperatures. The DEIR indicates that upstream migration from the ocean occurs from last week in August through December, but mainly in October and November. Then Chinook smolts are typically most abundant in May or June.

On page 4.5-12, it indicates that optimal temperatures for Chinook are 13-18C. Temperatures between 19-23C are considered sub-lethal and growth is reduced. A Press Democrat article of September 29, 2010 (ATTACHMENT #6) indicated that several Chinook had migrated past SCWA's rubber dam at their Wohler facility in the prior few days. Since the time span of this project begins on May 15th and extends to October 15th, how can project impacts for three weeks of the Chinook migration be ignored? If the river mouth were closed at that time, what would their survival opportunities include in the Estuary? On page 4.5-23, it indicates that the smolt could become more susceptible to predation by birds and seals. How can that be mitigated? G_RRWPC-47

Furthermore, temperatures at Johnson's Beach around that time averaged 20C, even when flows were averaging about 250 cfs in 2010. (Temperatures were about the same in 2009 at Johnson's when flows were much lower.) This temperature would be considered sub-lethal. Even though it is stated that Chinook like to avoid warm temperatures, they really had no choice. How far must Chinook migrate through the temperature impaired waterway? What impact does this have on their long-term health and reproductive viability? The Russian River is impaired for temperature and warm water is common. (Average temperature at Hacienda for that time of year was also about 20C.)

How was it determined that Chinook could be excluded from the study? What are the impacts to Chinook if the length of their migration is through sub-lethal temperatures? How will low flow impact that situation?

If Chinook were all the way to Forestville on September 28th or before, when would they have entered the Estuary? The Estuary closed on September 21st and remained closed until there was an artificial breach on October 1st. Not being a fisheries expert, I can't go much further with this analysis, but I ask the following questions:

- Since spring juvenile Chinook down-migration and adult up-migration activities clearly occur within the time span of this project, why were impacts to this threatened species not considered?
- How would probable conditions in the Estuary during their late fall migration impact their transit?
- What would be temperature impacts if low flow occurs during that period? (Since flows got down as low as 47cfs in 2009, we cannot be assured they will stay at 70 cfs or higher during hot periods.)
- Is anyone considering the health of these species, their continued viability and reproductive capacity, or only that they are seen swimming around?
- How will adoptive management of the Estuary during May, June, September, and early October affect migration patterns and health and well being of Chinook during those periods? (Page 4.5-23 claims that, "*The confines of the outlet channel may make the smolts more susceptible to predation by birds and seals.*")
- How will possibly excessive temperatures and dissolved oxygen in the Estuary and along the Russian River impact Chinook salmon?
- On page 4.5-23 it is stated that only a few Chinook migrate as early as August, but most migrate in November and December. Where is the data to prove this? While the intention of this project is to create a longer period of a closed environment, up to now this has not worked, and natural closings of the mouth have been limited and sporadic during the project period. There is a lot being left to chance here in terms of the anticipated success of the project and the ability to keep the mouth closed during this critical time. If the project cannot succeed, how will Estuary conditions (potential alternating of stratifications and variable water quality) affect the Chinook juveniles and in-migrating adults?

  Furthermore, it assumes that (page 4.5-23), "*Adult salmonids typically immigrate upstream following winter storms outside the proposed management period, when the Estuary would be open due to natural or artificial breaching.*"

G_RRWPC-47 cont.

This avoids addressing the transitional period. If artificial management of the Estuary is going to be a permanent condition, then potential impacts must be addressed, especially in October! G_RRWPC-47 cont.

How does the BO conclude, as stated here, that Chinook smolt will be able to exit the outlet channel. How would this be possible?

- It states on page 4.5-26 that the Estuary is important habitat for Dungeness crab and other species that utilize the brackish water in the Estuary. The DEIR determines that the impact will be minor because, while a substantial number inhabit the Estuary in summer, their numbers are great in other areas and mitigation is not necessary. If that is the case, why is it often difficult to buy crab at the grocery store? This DEIR made no attempt to quantify the impact. Is this a valid explanation? Doesn't CEQA require mitigation in this case? If not, why not? G_RRWPC-48
- Page 4.7-1 (Recreation) states that, "*The Estuary is a state marine recreational management area as defined by the Marine Life Protection Act (MLPA), managed by the California Department of Fish and Game (CDFG). Within the Estuary, the take of living marine resources is prohibited except recreational hunting of waterfowl.*" Would this project need a permit under this act if closing the Estuary will involve impacting Dungeness crab habitat? Would there be any permits required for this purpose with other agencies? G_RRWPC-49

Recreation (4.7)… …

There will be many recreation people commenting on this section, and since our expertise is limited in this area, we will only make a few points.

First, the authors of this document failed to talk to any of the local Recreational or Public Safety agencies and organizations about this issue. They didn't speak with hotel, motel, restaurant owners or the Chambers of Commerce. They failed to communicate with the Monte Rio or Russian River Recreation and Park Departments. They didn't speak to Burke's Canoes, Johnson's Beach, or Casini Ranch owners or any of the other businesses in the community related to recreation. They basically spoke only with State and County agency officials. G_RRWPC-50

With this Estuary project, the river will back up as far as Vacation Beach and an extent of beach area diminished. DEIR claims that 63 acres will be affected, but fails to show where those will be and what the impact will be on recreation. I have photos of the Monte Rio beach (east and west) taken one day apart showing before and after breaching. The gain of beach was significant after the breaching (see 2009 RRWPC Photo Report: pages 3-4: Attachment #3) it appears as though about 25% or more of the beach was gained after the mouth was opened. The DEIR makes no attempt to mitigate this significant impact.

We expect the surfers to write extensive comments on the possible loss of their resource at the river mouth.

The other big issue is in regard to the use and transport of equipment from the Goat Rock parking lot to the mouth of the river and its impact on recreation. This project proposes up to 18 times and up to 2 days each time of work on the perched lagoon. That's a potential 36 days of signs, posts, equipment, etc. on the beach over the summer. The seals will leave when the mouth is closed and the best part of the beach (the mouth) will be off limits. People travelling to the beach to visit this incredibly scenic area, possibly having come a long distance, will not know in advance whether they will be able to access it. This particular location is one of the most famous non-commercial scenic attractions in the whole County. The very last thing one would want to see on their visit to this incredible site are bulldozers, with blockades and barriers and signs telling them to keep away. This is bound to make a lot of people very upset. The analysis of the problem here is totally inadequate. G_RRWPC-50 cont.

Why are no mitigations proposed that serve the needs of the people rather than just the project? In fact, no real mitigations are proposed at all.

Cumulative Analysis……

Most comments on this section are on pages 4-7 of this document.

Page 5-7: What are the reasons for selection of the project dates of May 15 to Oct. 15?

Page 5-9: Statement is made that the BO calls for reducing flows from 125 to 70 cfs, "*….with the understanding that the Water Agency will maintain approximately 85 cfs at the Hacienda gage as practically feasible.*" This really has no meaning since the 85 cfs is not required, and there are no standards established for when and how this is to be done. It leaves decision totally to the discretion of the operators, the very ones who sell wholesale water to 600,000 people mostly residing in the urban areas. This appears to be a political ploy to assuage the concerns of the people in the lower river. What is the technical basis for the 85 cfs buffer? What is the technical basis for the 70 cfs minimum? Do these numbers have meaning, or did they come out of a hat? Can you provide the monthly daily averages for the period of record? Can you indicate mouth closings and openings in conjunction with flow data? G_RRWPC-51

Page 5-8: Why are minimum flows not required for Dry Creek? Their flow ends up at the Estuary also. In fact, their extraneous flow is one of the reasons that Hacienda came nowhere near the 70 cfs in 2010. Could it be that because it's upstream of the SCWA facility, they get special consideration? It is ironic, since it is their operation that triggered this process in the first place.

Page 5-11: Categorical exemptions in relation to TUC to protect a resource (steelhead), fail to acknowledge that there are other resource damaging impacts being exacerbated by this project. It's like killing the patient with side effects in the process of trying to make them well. G_RRWPC-52

Page 5-12: DEIR states that, "*Reduced inflows into the Estuary could adversely affect water quality conditions, particularly with respect to bacteria and nutrient levels within the Estuary during freshwater lagoon conditions. Reduced flows may reduce the assimilative dilution capacity of Russian River flows upstream of the Estuary, and assuming inputs within the watershed remain constant, could result in increased concentrations of nutrients and indicator bacteria.*"

It goes on to state that "*Water quality sampling by various entities, including SCWA have not identified bacterial levels that warrant listing the Estuary as impaired, and the 303(d) listing for bacteria is limited to areas upstream of Austin Creek.*"

At the Jan. 28th meeting of the Regional Board, staff made a presentation on their elaborate plans to begin the listing process for the 2012 303(d) List of bacteria for the entire lower river. (ATTACHMENT #7) How would such a listing impact this project? You say bacteria levels in the Estuary don't merit impairment listing, but on page 4.3-8 it refers to increased coliform levels, which conveyed cause for concern. Here the situation is downplayed. What were the reading levels that were referred to? Why is no data presented to clarify your statement? G_RRWPC-53

Ultimately, the DEIR admits there is inadequate data to conclude whether the Estuary Project will be impacted by high bacterial levels during any and/or all flow levels and will rely on future monitoring to address this issue. Breaching will be the mitigation for addressing water quality and flooding problems.

Conclusion….

All in all, we found this document extremely lacking in scientific evidence in most sections, limited references, many conclusory statements based on conjecture, and few meaningful mitigations. In many cases, there is reliance on future studies. There is also excessive repetition making it very laborious to read. G_RRWPC-54

Finally, there are no criteria listed which would allow determination of the success or failure of this project. There is no statement that should certain events occur, the project will be aborted. Neither is there any statement as to how success will be measured. How will anyone know if the project is working? At what point might someone judge that the negative effects are worse than the positive impacts? There needs to be a way to evaluate this project as it proceeds in time. G_RRWPC-55

Submitted by Brenda Adelman for RRWPC

RRWPC

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February 14, 2011

G_RRWPC-24

Russian River Watershed Protection Committee (RRWPC): REVISED Scoping comments on SCWA's Russian River Estuary Project

By Brenda Adelman

This is a revised version of our Scoping Comments for the Draft Environmental Impact Report DEIR. Since CEQA does not require a response to scoping comments, we are resubmitting a revised version of these comments for the DEIR so as to require a response. We have excluded comments that were appropriate for scoping but not the DEIR. We will submit additional comments on the DEIR separately.

Introduction:

These comments are being filed on behalf of Russian River Watershed Protection Committee (RRWPC). We are a nonprofit public benefit organization incorporated in the State of California since 1980. Our supporters number approximately 1200 property and business owners, recreationists, and other concerned citizens in the lower river area from Healdsburg to Jenner. We also

have a great deal of support from many others who appreciate our advocacy on behalf of the Russian River.

RRWPC supporters and activists utilize the Russian River for recreation and/or tourism, for fishing, swimming, for artistic expression, spiritual well being, for exercise and personal health of ourselves, family, friends and pets, and for replenishment of health and energy needed to balance out the stresses of modern day life. Due to its proximity to Bay Area urban centers, the beautiful and peaceful lower Russian River is easy to access and allows a natural refuge from everyday cares. Many of our supporters own properties in the lower river for their summer enjoyment, but reside and work in the greater Bay Area and beyond. Because of all this, they have a great interest in this proposed project.

Scope of project:

Geographical limit:

The Estuary Project is defined from the mouth of the Russian River to a little upstream of the town of Duncans Mills (Austin Creek), about 7 miles upstream of the Estuary. Last October we took pictures of the river in Monte Rio the day before and the day after the mouth was open (October 5th and 6th). This was part of a photo project we worked on all summer. (Report attached to this document.)

The pictures indicate a profound impact on Monte Rio Beach when the mouth is open or closed, the water being more than a foot higher when closed and at least 200 extra feet of beach exposed when open. Furthermore, there was a considerable amount of algae left on the beach when the mouth was opened, indicating amounts present in the water when mouth was closed. (Monte Rio Beach seems to be one of the worst impacted by algae with a great deal of Ludwigia as well.) These seem to fit the narrative standards for nutrients in the Basin Plan and need to be addressed. What is the fate of the algae during each of these circumstances? How does it affect the fish and the Estuary? What impact might this have on the availability of pathogens? (Our comments on this subject will go into greater depth since some of this issue was partially addressed in the DEIR.)

G_RRWPC-56

The closing of the mouth slows the flow of water and turns the lower river into a lake. To what extent will (and has) this "lake" become a sink for pollutants that bioaccumulate in the biota and sediments to create a harmful environment for people and fish? In fact, we have concerns that the "dead zone" (anoxic zone) in the Estuary harbors many toxic pollutants. Are/will any studies be done to determine the extent of pollution in the Estuary, whether it is being reintroduced

into the water column, and whether it is contaminating the fish (Are there any fish samples being studied?)? Also, to what extent does the anoxic bottom affect the macro invertebrate food sources of the fish? Are there any other threatened or endangered species or species of concern in the Estuary? How will they be affected by this project? G_RRWPC-56 cont.

Bifurcation of Estuary Project and "Low Flow" Changes to D1610:
We are concerned about the bifurcation of the Estuary Project EIR and changes to D1610 EIR. In Section 15003 (h): Policies, it states that, ***"The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect."***

This project is based on requirements in the Biological Opinion, which is a legally binding document issued by the National Marine Fisheries Service. Page 241 of the BO presents the Reasonable and Prudent Alternatives (RPA). It states that, ***"All eight modifications and additional actions must be implemented as one RPA."***

Item 1 directs SCWA to petition the State Board to change minimum bypass flows in Decision 1610 (D1610), and also calls for SCWA to complete all necessary environmental documentation to promote changes to D1610 minimum flows as per Section X.A.1 G_RRWPC-57

Item 2 (page 242) includes the following: ***"SCWA will collaborate with NMFS and modify their estuary water level management in order to reduce marine influence…..in the estuary during the summer and promote a higher water surface elevation in the estuary for purposes of enhancing the quality of rearing habitat for age 0+ and 1+ steelhead."***

Furthermore, the following statement appeared on page 231 of the BO: ***"Proposed project operations will likely have significant effects on the PCE of estuarine critical habitat for each salmonid species because flow management at WSD and CVD will create high inflows to the estuary during the low flow season and the sandbar breaching activities at the mouth will significantly affect water quality in the lowermost segment of the river."***

In fact, the NOP (page 3) states that, ***"NMFS' Russian River BO found that artificially elevated inflows to the Russian River Estuary during the low flow season (May through October) and historic artificial breaching practices have significant, adverse effects on the Russian River's estuarine rearing habitat for juvenile salmonids, particularly steelhead….NMFS' Russian River BO concludes that the combination of high inflows and breaching practices impact rearing habitat because they interfere with natural processes that would otherwise***

cause a freshwater lagoon to form behind the barrier beach. According to NMFS, fresh or brackish water lagoons at the mouths of many streams in central and southern California often provide depths and water quality that are highly favorable to the survival of rearing salmon and steelhead." G_RRWPC-57 cont.

These statements appear to attest to the fact that there is a direct link between D1610 flow changes and the Estuary Project, thereby making it unacceptable to consider them in separate EIRs. We will address this further in our main body of comments.

Natural flows and breaching the mouth:
In his article appearing in the June 3rd edition of the *Sonoma County Gazette* (attached), Dr. William Hearn, chief author of the Biological Opinion, repeatedly referred to "natural flows" that used to occur in the Russian River more than 100 years ago and prior to the building of three major dams. He goes on to make the case that juvenile Steelhead **appear** to thrive in fresh water lagoon conditions and would have a much higher rate of survival if low flow conditions could be maintained. G_RRWPC-58

In our comments to SCWA and the State Board on the Petition to permanently change D1610, RRWPC submitted a document entitled: *"Review of the Flow Proposal in the Russian River Draft Biological Assessment"* by Prunuske Chatham and scientific review members, Daniel Malmon, William Murphy, and Bill Trush, all Ph.D's, September 24, 2004. (Since we have already submitted the document to SCWA with our Comments on D1610 flows, we simply reference it now. It was attachment #12 in that packet.)

They ask the critical question (page 17): *"How are the Russian River's salmon and steelhead populations faring under the present D1610?"* Please respond to this question.

Page 21 of the document complains, *"Not only is natural flow missing from the stated objectives (of Biological Assessment), but an increase in salmon and steelhead populations is not a clear objective either. Rather, an "improvement" of existing summer habitat and habitat protection under increased future water demand is the objective. The Draft BA does not assess the contemporary status of salmon and steelhead populations in the Russian River Basin. Are populations improving, still declining, or staying about the same under D1610? Is the goal of "improving" habitat sufficient to stabilize declining populations presently below historic numbers? The Draft BA never provides a quantitative goal for habitat improvement."* G_RRWPC-59

RRWPC believes that this critique also applies to the Biological Opinion and comments made by Dr. William Hearn as to why the Estuary Project and the

D1610 Petition are necessary. This EIR should address these issues and verify the claims made to justify this project. Can you fully define the relationship between flows, mouth closings, habitat resources, fish abundance and health, including reproductive health? G_RRWPC-59 cont.

RRWPC replied to the Bill Hearn article (Sonoma County Gazette, June 3, 2010, page 1) with this about "natural" flows:

In order to promote the recovery of Coho and Steelhead, the article notes that federal officials recommend, "*One of these steps {leading back to recovery} involves restoring a more natural flow regime for the Russian River, while being careful to not unduly impact water quality and other resources.*"

The article refers to possible pre-dam river flows of 30 cubic feet per second (cfs), but is unclear about whether these flows occurred throughout the river system. The article fails to assign impacts from all the changes in land use that has occurred in the last 100 years, nor how going back to original flows, would impact the entire system. In fact, it is stated that Estuary rearing would help the survival of the species, but fail to mention that normal habitat in the tributaries has been decimated by legal and illegal water diversions, careless agricultural processes, timber harvesting, gravel mining, riparian destruction, etc. Now they are left with fewer habitat options, and this current scheme is an experiment and possibly a last ditch effort, to save species that may not have a chance otherwise.

Actually, when Dr Hearn talks about going back to "natural flows", he doesn't explain that they are only recommending flows of 70 cfs for the lower river and not the entire system. Flows north of Healdsburg will only be reduced to 125 cfs (which is our normal flow and with which we could probably be content). By assigning a theoretical historical flow of 30 cfs and then appear generous by saying they will allow us three times that amount, is manipulative and condescending and certainly not at all scientific. If "natural flows" are the goal here and will serve as a justification for permanently changing D1610, then we wonder if it would only be fair to describe all impacts on "natural" flow conditions as well? G_RRWPC-60

For instance, what is the impact on "natural" river flows by draw down of tributary flows due to over-drafting of water supplies by wine growers? Was 30 cfs considered "natural flow" during a wet year? What were natural flows in a wet, or normal year? (2010 was a normal rain year with a wet spring. Even though releases from the two dams were cut back, flows at Hacienda averaged 260 cfs from May into October. Since it had been a cool summer, creeks weren't drawn down and the river flows remained full. Is this "natural"?) What are the various scenarios and entire range of possible flows under "natural" conditions? (The DEIR tries to make the case that it's okay to bifurcate the D1610 EIR from the Fish Flow EIR because the Estuary Project doesn't need the low flow and can stand alone. If this is the case, then "low flow", especially at Hacienda should be dropped. I will revisit this issue in our main body of comments.)

Comment Letter G_RRWPC
Attachment 1

Furthermore, the article states that while normal low flow had been 125 cfs, ACTUAL flows commonly ran 120 to 180 cfs, therefore "low flow" should be 70 to 85 cfs. Where is the scientific data demonstrating how the ideal of 70 cfs was arrived at? In fact, at the June 9th meeting in Guerneville, Dr. Hearn kept moving the goal post by first saying that flows would actually be about 85 cfs, and then he said 90 cfs., and then 100-110 cfs. Since the only formal change in the Petition is 70 cfs., there is no regulatory meaning to the other suggested flows. Where is the scientific justification for 70 cfs? Exactly what is intended to be accomplished by keeping flows at this level?

The phrase, "*not duly impact water quality*" has not been defined and no specific regulatory standards are offered. It merely states that the Regional Water Quality Control Board provided oversight on water quality monitoring. Yet, nutrient monitoring conducted last year by SCWA incorporated excessive detection limits, which resulted in worthless data. Temperature was extremely high, but no concern expressed even though some steelhead and Chinook may remain in the system in the summer time. Our impression is that the Regional Board was involved in setting up the monitoring program and then afterwards actually paid little attention to the process. Just recently, the Regional Board committed to studying nutrients and bacteria in the lower river because of their concerns about the impact of low flow.

Another aspect to this situation is the link between low flows and Estuary closure. Our attachments submitted to SCWA with the Permanent Change Petition to D1610 comments included a chart of the mouth closures (#7). In looking at the chart, it is clear that the trend in the last ten years or so has been for the mouth to remain open most of the time in July and August no matter what the flow. I believe that there were few closures in 2009 between June and September, although summer flows averaged as low as 63 cfs in August. G_RRWPC-60 cont.

For example, 2002 was a low flow year and the mouth was open most of the time until Oct. 1st, but for two very brief closures in May and June. 2003 was open through September. 2004 was open until October, but for three brief openings in April, May, July/August. 2005 was open all year until mid-September. 2006 was open all year until late October. 2007 was open all summer (May through September) until mid-October. 2008 was closed much of May, but had only two closures for about a week each during June through September. These statistics seem to dispute the NOP claim that frequently the mouth closes in the summer time, at least in the last ten years. We wonder if the barrier beach would be constructed if the first mouth opening comes in September?

In any case, Dr. Hearn's comments seem to prove the argument that there is an indisputable symbiotic link between the Estuary Project and decreased flows. Therefore, CEQA and NEPA documents on these two projects (Estuary and D1610) should be merged.

Flooding justifies need for low flows:

Another circumstance linking the Estuary Project to the D1610 revision is the estuary flooding which in turn triggers the need to artificially open the mouth when water levels exceed seven feet. This flooding is directly related to Russian River flows and is the central reason for requiring SCWA to petition the State to change D1610 and reduce lower river flows by 45% (125 cfs. To 70 cfs). To imply that summer flow levels in the lower river are too high and are harming the threatened fish is really misleading, since the true immediate concern is for the flooding of a limited number of properties. (Since more information on this appeared in the DEIR, our full comments will address this situation in detail.) G_RRWPC-61

A report has been prepared showing about 90 properties that may be subject to inundation at various levels. Further study needs to be conducted because many of the properties listed only flood when water levels go over 10-12'; numerous properties are undeveloped or underdeveloped, and some are abandoned. We suggest that more meaningful research be done sooner rather than later, so we can see if the flow problem can be resolved by simply lifting a few structures out of the flood plain, rather than subjecting a whole river to minimal flows and potentially significant water quality problems. (Dr. Hearn has admitted that flows might be able to remain at 125 cfs if the flood issue could be addressed.)

What is the role of ocean conditions in the Estuary Project?

In response to a question about the Coho *Broodstock Program*, we recently learned that no Coho returned last year in spite of a great deal of tributary work to improve conditions. The explanation from a key Fish and Game official was that poor ocean conditions probably accounted for the disappointing results. Could these conditions include acidification? Could they include other water quality problems? Will water quality problems in the ocean be addressed as part of this project? G_RRWPC-62

Ocean conditions also help govern when the mouth opens and closes. Since we noted a possible trend in the mouth remaining open in summer under numerous flow conditions, one would think that conditions may be different in the ocean to explain this. What studies will be conducted to better understand the ocean's role in the opening and closing of the mouth?

Also, there has been a lot mentioned in the media the last several years about global warming and rising sea levels. What role could this be playing in the long term management of this project? Is there a map available showing the level of inundation of our coast?

RRWPC incorporates by reference our entire packet of comments (25 pages) and 32 attachments concerning the Petition for the Permanent Change to D1610 submitted to the State and SCWA on May 13, 2010.

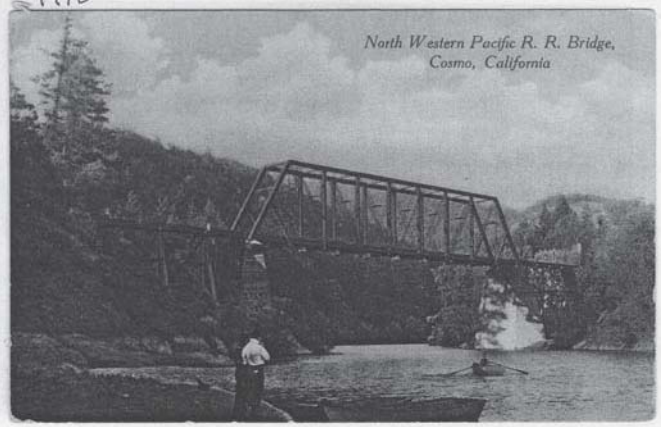
Comment Letter G_RRWPC
Attachment 1

Attachments:

Photographic Report on Water Quality Conditions in Russian River

"Why Change Summer Flows in the Russian River" by Dr William Hearn, iSonoma County Gazette, June 3, 2010

1910



cosmo - Hacienda

Comment Letter G_RRWPC
Attachment 2

1925

Russian River Watershed Protection Committee

2009 Photo Project

Report: June 21, 2010

By Brenda Adelman for RRWPC

Comment Letter G_RRWPC
Attachment 3

Photographic Report on 2009 Water Quality Conditions in Lower Russian River:

Response to proposed 45% cut in summer flows.

By Brenda Adelman for RRWPC

I. INTRODUCTION

In late May, 2009, in anticipation of very low summer flows as measured at the Hacienda Bridge, I started taking photographs from the Hacienda Bridge, the Guerneville (Old) Bridge, and the Monte Rio Bridge and Beach every week until early October, but for one week. Several other photographers assisted, including Laurie Ross, Larry Hanson, Shula Zuckerman, Kim Pistey, Tom Meldau, Shane McColgin, and Community Clean Water Institute volunteers.

Photographs were taken between the end of May and the end of September between Steelhead Beach and Monte Rio Beach. We also received a few photos from supporters and have included one picture from the Duncans Mills area as well. We ended up with thousands of photos and this report offers just a sample of representative scenes we shot.

Our goal was to photograph water quality problems, mostly in the form of nuisance algae and Ludwigia and also to show the water levels as the summer progressed. The two dams at Guerneville and Vacation Beach kept waters consistently high in that area all summer. The area where flow changes were most visible was the Kid's Beach in Monte Rio, which is east of the bridge. That was also the area with some of the worst algae. Over the course of the summer we saw many different kinds of attached and unattached algae and offer a representative sample in the pictures. We don't know the names of what we found, but hope some more knowledgeable than ourselves will be able to identify them.

We also tracked water quality monitoring reports as well as pathogen exceedances and beach postings. Furthermore, we include flow data as measured at Hacienda. There are no other flow gauges for the lower river that we know about. Unfortunately, the nutrient data for the entire year included inappropriate protocols and is very inadequate for scientifically determining the extent of the problem. Hopefully this will be corrected in 2010.

This report is divided into several sections including, algae, Ludwigia, water levels and impact on beaches, both by flow control and opening of mouth. We include two sets of before and after pictures, upstream and downstream of the Monte Rio Bridge showing the impact of opening the mouth of the river. Two of the pictures were taken on October 5th just as the mouth was being opened, and two were taken the very next day. The difference is profound.

After the breaching, when the water went way down, the beaches where the water had been were covered with algae. I talked to Regional Board staff about the algae and was told they would take samples. I was later informed that toxic blue-green algae had been found in the area of the Kids' beach at Monte Rio.

We include Hacienda flow data here, which we obtained from Sonoma County Water Agency. All of the flows through Sept. 30, 2009, had been verified by USGS. The October flows had not yet been verified. Over the course of the summer, of the 130 days total, 57 days the flow was under 85 cfs, and 31 days were under 70 cfs. The lowest flow was 47 cfs on August 17, 2009.

A few of the pictures state "pathogen exceedence". This means that weekly monitoring at Monte Rio Beach for pathogens was out of compliance on that date. The temperature data came from Hacienda or Johnson's Beach monitoring sites and averaged about 20 to 25 Celsius, which is far too high for salmonids. Temperatures diminish considerably in the fall however.

RRWPC requests that the enclosed photographs not be used for any purpose other than as evidence for consideration of changes to Decision 1610, either Temporary or Permanent. They may also be used by North Coast Regional Board staff for scientific evidence of water quality impairment of the lower Russian River. We do not allow these photos to be used for any commercial purpose without written permission. Where no photo credits are given, pictures were taken by Brenda Adelman.

II. MOUTH BREACHING & FLOW IMPACTS

Breaching of Mouth: impacts on Monte Rio Beach: looking west....

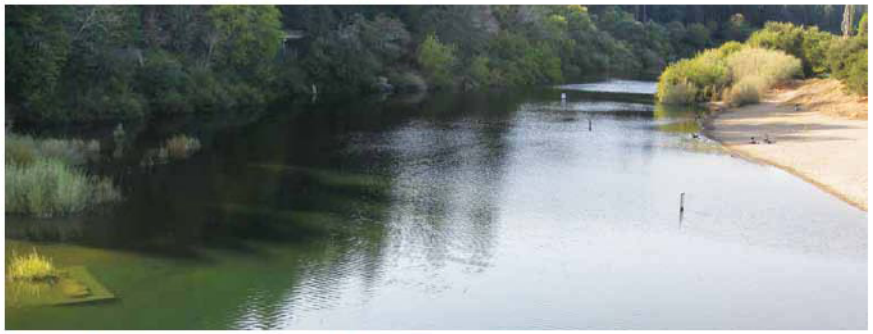


Photo 0145 was taken from the Monte Rio Bridge in the afternoon on Oct. 5, 2009 around 4 pm. looking west. Notice signs on mid-right of photo, far into the water. On far left notice accentuated plant on cement structure and plants submerged behind it. The water here was much higher than I had seen all summer at this location.

Hacienda flow: 92 cfs (not yet verified by USGS)

Photo 0228 was taken one day later (Oct. 6, 2009) of the same scene (magnification a bit different however.) In this picture you can see flat rectangular cement structure with plant behind it and beach all exposed behind.

On the right you can see the sand bar jutting way out with signs that had been far into the water on Oct. 5th, now far back on the sand. The line in the sand behind the signs is where the water had been the day before. Also, you can see sand bar jutting way out beyond bushes in upper right of photo. Although you can't see it in this picture, that beach is covered in algae where the water had been.

Hacienda flow: 102 cfs (not verified by USGS)

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Breaching of Mouth: impacts on Monte Rio Beach: looking east....

Photo 0165: This picture was taken about 4 pm on Oct. 5th. The water line is right behind white wood platform. Bushes along the bank and Ludwigia go far out beyond water line.

Photo 0239: This was taken around 2:30 pm on Oct. 6th after breaching of the mouth. You can see white platform far back on sand and sand bar juts out beyond Ludwigia.

Low flow impacts on Monte Rio Beach:

Photo 5845: This is another comparison of the same beach scene looking east. This picture was taken earlier in the season on July 11, 2009. Water levels are more than October 6th but less than October 5th when the mouth was closed. The mouth was open when this picture was taken.
Hacienda Flow: 112 cfs
Temperature: (Johnson's Beach) 23 Celsius

Photo 7924: This picture contrasts with 5845 in that you can see that the river level is much lower (mouth open in both pictures). This was the most visible bridge location where we can see the impact of flow levels on the river. It was taken on Aug. 15, 2009
Hacienda Flow: 50 cfs
Temperature: (Johnson's Beach) 25 Celsius

III. ALGAE:

Photo 0329: This is essentially a blow up of photo 0228 on page 3 (upper right of photo) and taken Oct. 6, 2009 at Monte Rio Beach looking west. It shows prevalent algae in water and on beach AFTER opening of the mouth of the river. You can also see water line from prior day in bottom right corner.

Photo 0387: taken by Bill Clark behind his Duncans Mills vacation home on July 31, 2009 in the morning.
Hacienda flow: 76 cfs
Monte Rio Pathogen exceedence

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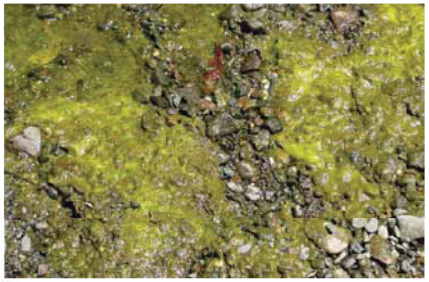
Photo 4752: This photo was taken from the Monte Rio Bridge looking west on June 22, 2009. The whole water column seems to be subject to a large algal bloom. In subsequent visits, it was not nearly so iridescent green.
Hacienda flow: 157 cfs
Temperature:

Photo 0326: This picture was taken on Aug. 22nd from the Monte Rio Bridge looking east towards the Kid's Beach. As I looked down into the water in the middle of the bridge, the floating algae could be seen going by.
Hacienda flow: 64 cfs
Temperature: (Johnson's Beach) 23.63 Celsius

Photo 0407: This was taken at the Monte Rio Kid's Beach while down at the beach, also on Aug. 22nd. I believe that this is a different kind of algae than what was seen in the prior picture.
Hacienda flow: 64 cfs
Temperature: (Johnson's Beach) 23.64 Celsius



Photos 6814 and 7239: These photos were both taken at the Kid's Beach (from the beach) in Monte Rio. 6814 was taken on Aug. 2, 2009 and 7239 was taken on Aug. 8th. They were both from the same area.
Hacienda flow: 71 cfs and 64 cfs
Temperature: (Johnson's Beach) 23.35 Celsius

Temperature: (Johnson's Beach) 23 Celsius

ALGAE continued

Photo 6980: This picture was taken from Hacienda Bridge on Aug. 2, 2009 Looking west (downstream), the hill on the right is where the pipe is located and the algae is right down below.
Hacienda flow: 71 cfs
Temperature: 22 C

Photo 0369: This was taken at the footings of the Vacation Beach Dam (from the road) soon after it was taken down. The picture was taken on Oct. 6, 2009. The algae are very bright green as you can see, but we don't know what it is. Regional Board staff verified that it is not blue-green algae.
Hacienda flow: 102 cfs

Photo 8100: This picture was taken from the Hacienda Bridge on the North side and looking over to the right. There is a huge outcropping of Ludwigia on this bend and immediately downstream is the large mat of attached algae. This picture was taken on Aug. 16, 2009.
Hacienda flow: 51 cfs
Temperature: 23 C

Johnson's Beach algae photographed by Shula Zuckerman on September 27, 2009. The picture speaks for itself.
Hacienda flow: 69 cfs
Temperature: 21 C

Photo 3542: Picture of floating and submerged algae taken by Laurie Ross in the Steelhead Beach area on August 18, 2009
Hacienda flow: 51 cfs
Temperature: 23 C

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Photo 3552: Steelhead Beach algae taken by Laurie Ross on August 16, 2009
Hacienda flow: 51 cfs
Temperature: 23 C

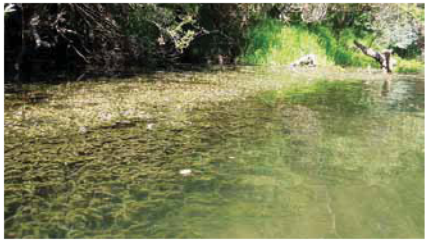

Photo 3311: taken by Laurie Ross in the Steelhead Beach area. This picture shows both Ludwigia and the attached floating and attached tubular algal plant under the water's surface. July 20, 2009 at west Steelhead Beach area, I found the same kind of growth at Hacienda looking south from the bridge on the right bank. **Photo 6327** was taken July 19, 2009.
Hacienda flow: 69 cfs
Temperature: 23 C

IV. LUDWIGIA

This invasive plant has overrun much of the Laguna and is now evident throughout the entire lower Russian River watershed. The Laguna Foundation eradicated it fairly successfully a few years ago in one area (near Stony Point west of Cotati), but it rapidly came back full force when not maintained. It now fills the entire channel.

Ludwigia is found in outgrowths from the bank along the whole lower river. We photographed downstream of SCWA facilities, but we know it occurs upstream as well, although not as prevalent as the lower section of the river. We include representative photos here going down the river from Mirabel (Steelhead Beach) to Monte Rio.

Steelhead Beach: Photo 7-31c looking downstream on July 31, 2009. You can see seven outcroppings in this picture along the bank. Hacienda flow on that date was 76 cfs. Picture taken by Tom Meldau and Shane McColgin.

Sunset Sunset Beach Ludwigia pictures taken by Larry Hanson (Photos 0098, 0024, 0026).

Photos 0024 and 0026 were taken west of the main Sunset Beach on July 25, 2009
Hacienda flow: 71 cfs

Photo 0098 was taken on July 4, 2009 in about the same location
Hacienda flow: 128 cfs

Hacienda Beach:

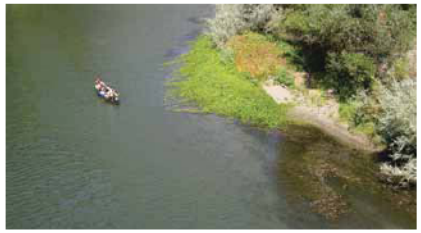

Photo 8091 was taken on August 16, 2009 (**Hacienda flow:** 51 cfs) and shows a large outcropping just north of the Hacienda Bridge looking down to the right.

Photo 8384 was taken looking south on the Hacienda Bridge towards the right bank on August 22, 2009.
Hacienda flow: 64 cfs

Photo 6684: Hacienda Bridge looking downstream at the left bank. Picture taken July 26, 2009 This is an outcropping of Ludwigia right next to outcropping of submerged attached algae.
Hacienda flow: 74 cfs.

Oddfellow's Bridge:
Photo 30002 taken by Kim Pistey, I believe at the Oddfellow's Bridge. (I was unable to contact her to verify.) The picture was taken in late August.

Old Guerneville Bridge: (looking east):
Photo 6246: taken July 18, 2009.
Hacienda Flow: 81 cfs.

Dubrava Beach:
Photo (#8) taken September 5, 2009 by Shula Zuckerman.

North bank between Russian River County Sanitation District and Monte Rio Beach:
Photo 3200: taken by CCWI volunteer. Not sure of date, but I had noticed area and it had been pretty consistently the same all summer.

Monte Rio Kid's Beach:
Photo 6591 taken July 25, 2009.
Hacienda Flow: 71 cfs

Researched and prepared by volunteers for:
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www.rrwpc.org

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

November 15, 2010

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Ms. Martini-Lamb:

Subject: Comments on the Notice of Preparation of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project, SCH No. 2010092087

G_RRWPC-34

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report for the Fish Habitat Flows and Water Rights Project (Fish Flow Project EIR). We appreciate the opportunity to participate early in the environmental review process. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The proposed project consists of the management of water supply releases from Lake Mendocino and Lake Sonoma to provide instream flows in the Russian River and Dry Creek. The project proposes to modify the Sonoma County Water Agency's (Water Agency) existing water-right permit to change the minimum instream flow requirements, consistent with the National Marine Fisheries Service's Russian River Biological Opinion dated September 24, 2008.

We have reviewed the NOP for the Fish Flow Project EIR and offer the following recommendations and comments.

General Comments

The mission of the State Water Resources Control Board and Regional Water Boards is to preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. The quality of surface and ground waters in the North Coast Region of California is governed by the *Water Quality Control Plan for the North Coast Region* (Basin Plan) and state-wide Policies. The Basin Plan identifies the existing and potential beneficial uses of water within the North Coast Region and the water quality

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objectives necessary to protect those uses. The relevant existing beneficial uses that apply to the Project area include: Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Groundwater Recharge (GWR), Water Contact Recreation (REC1), Non-Contact Water Recreation (REC2), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), Estuarine Habitat (EST), Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), and Spawning, Reproduction, and/or Early Development (SPWN). The water quality objectives of specific concern to Regional Water Board staff are outlined in the following sections. Together water quality objectives, beneficial uses, the anti-degradation policy, and implementation policies are known as water quality standards. The NOP identifies hydrology and water quality as specific areas of analysis for the EIR, including an analysis of potential cumulative impacts related to the Project. The Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the Project area.

Russian River Water Quality Impairments

Section 303(d) of the federal Clean Water Act and 40 CFR §130.7 require states to identify water bodies that do not meet water quality standards and are not supporting their beneficial uses. These waters are placed on the Section 303(d) List of Water Quality Limited Segments (also known as the list of Impaired Waterbodies). The List identifies the pollutant or stressor causing impairment and establishes a schedule for developing a control plan to address the impairment. On August 4, 2010, the State Water Board adopted the California 2010 303(d) List and the United States Environmental Protection Agency will likely approve or disapprove the 2010 List in November 2010. This 2010 List includes the following three impairments for the Russian River within the Project area: sedimentation/siltation, temperature, and indicator bacteria.

State Water Board staff have begun assessing available data in order to update the 303(d) List. State Water Board staff's assessment includes nutrient and algal biomass data collected within the Project area and submitted by interested parties. At a later date, Regional Water Board staff will consider whether the available data demonstrates that the Russian River within the Project area is impaired for nutrients/biostimulatory substances.

Regional Water Board staff is currently developing a pathogen total maximum daily load (TMDL) for the Russian River to address the indicator bacteria impairments and a temperature implementation policy to address the temperature impairment. The sediment impairment in the Russian River watershed is addressed, in part, by the *Total Maximum Daily Load Implementation Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region* (Resolution No. R1-2004-0087).

California Environmental Protection Agency

Recycled Paper

Water Quality Objectives of Concern

The following are the water quality objectives that we believe could be violated under the Fish Flows Project, and a brief explanation of why violations of these objectives are a concern.

Bacteria: *The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels. In no case shall coliform concentrations in waters of the North Coast Region exceed the following: In waters designated for contact recreation (REC-1), the median fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed 50/100 ml, nor shall more than ten percent of total samples during any 30-day period exceed 400/100 ml (State Department of Health Services).*

Per the *Draft Guidance for Fresh Water Beaches* (DHS 2006), freshwater beach posting is recommended when single sample levels exceed the following thresholds: 1) Total coliforms - 10,000 MPN/100mL; 2) E. coli - 235 MPN/100mL; and 3) Enterococcus - 61 MPN/100 mL.

Our working hypothesis, supported in part by preliminary empirical analysis of available data (Attachment 1), is that under a given loading of bacteria from existing sources, reduced flows provides less dilution and may lead to higher bacteria concentrations, potentially causing violation of the bacteria objectives and beach posting thresholds and not supporting REC1 and REC2.

Biostimulatory Substances: *Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.*

Biostimulatory substances include nitrogen and phosphorus. It is generally recognized that flow, along with channel morphology and riparian conditions, is a "risk cofactor" that can affect the biostimulatory response of nutrients in a waterbody (Tetra Tech 2006). Assuming all other factors are constant, a given concentration of nitrogen and phosphorus in a waterbody can lead to greater biostimulation under reduced flows. Biostimulation can result in more aquatic plant productivity under lower flow conditions.

Dissolved Oxygen: *The instantaneous minimum concentration of dissolved oxygen (DO) required is 7.0 mg/L. Half of the monthly mean DO values for the year must be 10.0 mg/L or greater.*

Reduced DO conditions can occur, particularly during pre-dawn and early morning hours, due to respiration of aquatic plants and decomposition of organic

matter, which can occur under biostimulatory conditions in a water body. As summarized above, biostimulatory conditions may result from reduced flows in the Project area.

Toxicity: *All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analyses of species diversity, population density, growth anomalies, bioassays of appropriate duration, or other appropriate methods as specified by the Regional Water Board.*

The toxic parameters of concern are blue-green algae toxins. Algal productivity is a biostimulatory response. Algal biomass can include blue-green algae species. Some blue-green algae species produce algal toxins that can be harmful to humans, pets, and wildlife.

Temperature: *The natural receiving water temperature of intrastate waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses.*

At no time or place shall the temperature of any COLD water be increased by more than 5°F above natural receiving water temperature.
At no time or place shall the temperature of WARM intrastate waters be increased more than 5°F above natural receiving water temperatures.

"Natural receiving water temperature" is that temperature regime that would occur in the absence of human alteration of those factors, including flow, which can affect stream temperature. The Fish Flows Project EIR must demonstrate to the satisfaction of the Regional Water Board that the Project does not contribute to violation of the temperature objective. We recommend the use of a water quality model to evaluate temperatures representing baseline, with-project, and natural conditions. The natural condition representation should evaluate temperatures that would be expected to occur without flow augmentation from reservoirs. The model should be capable of predicting hourly temperatures so that the 5°F restriction can be properly evaluated.

Sediment: The Basin Plan contains the following four sediment-related water quality objectives:

Sediment: The suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.

Turbidity: Turbidity shall not be increased more than 20 percent above naturally occurring background levels. Allowable zones of dilution within which higher percentages can be tolerated may be defined for specific discharges upon the issuance of discharge permits or waiver thereof.

Suspended Material: Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.

Settleable Material: Waters shall not contain substances in concentrations that result in deposition of material that causes nuisance or adversely affect beneficial uses.

Flow is a factor that could affect in-stream sediment loads. One potential mechanism for increases in sediment discharges from the Project is a drop is the water table which might lead to loss of riparian vegetation and subsequent bank erosion.

Water Quality Monitoring and Assessment

As stated above, the Fish Flow Project EIR must ensure that the Project complies with the water quality standards within the Project area. This assessment should be based on not only available water quality data, but also new water quality data, the collection of which should be designed specifically to evaluate potential impacts to water quality standards from reduced flows.

The stated objectives of the Russian River Water Quality Monitoring Plan for the Sonoma County Water Agency 2010 Temporary Urgency Change (2010 Monitoring Plan) were, "to provide information to evaluate potential changes to water quality and availability of aquatic habitat for salmonids resulting from the proposed permanent changes to Decision 1610… and provide information to support the development of a CEQA document required for permanent changes to Decision 1610." We support these objectives, and expect the Water Agency to meet them through additional monitoring and assessment efforts in 2011 and beyond. We believe that the assessment of changes in water quality should involve statistical analysis. Statistical analysis of water quality data for trends often requires an adequate time period to detect a statistical change in constituent concentration. The amount of time required to detect a trend is dependent on the sample variability. Constituents like bacterial indicators have a high ambient variability and therefore require longer monitoring time periods before a trend can be detected.

As mentioned previously, Regional Water Board staff are conducting water quality monitoring and assessment in development of an indicator bacteria TMDL for the Russian River within the Project area. In addition, in 2011 Regional Water Board's Surface Water Ambient Monitoring Program will conduct monitoring and assessment of nutrient/biostimulatory conditions within the Project area. Regional Water Board staff will make our data from these projects available to Water Agency staff for your use in

preparing the Fish Flow Project EIR. In addition, Regional Water Board staff are available to work with Water Agency staff to design additional monitoring to support the preparation of the EIR. Finally, Regional Water Board staff are available to consult Water Agency staff on appropriate statistical analyses to conduct on relevant water quality data in order to meet the stated monitoring and assessment objectives of the 2010 Monitoring Plan.

Impacts to Estuary

The Project has the potential to cause elevated water levels within the Russian River estuary. The Fish Flow Project EIR should evaluate the potential for elevated water levels to inundate residential septic systems located near the estuary shore and cause system failures, which could lead to discharges in violation of the Basin Plan.

Though Regional Water Board staff recognize that this Project NOP does not address breaching of the barrier beach between the ocean and the Russian River estuary, we provide the following comments for your consideration. Past activities to artificially breach the barrier beach between the ocean and Russian River Estuary have been covered by a Clean Water Act Section 401 Certification (certification). The current certification (WDID No. 1B04001WNSO) and its amendment expire on December 31, 2010. On September 24, 2008, the National Marine Fisheries Service issued the Biological Opinion entitled "*Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River Watershed*," (File No. 151422SWR2000SR150).

A new certification will need to be applied for and issued for new methods of creating the outlet channel and breaching the estuary that will be more protective of salmonids and the estuarine habitat by providing deeper, cooler, and less saline water for improved rearing habitat for salmonids within the estuary. Flow will be a critical factor to evaluate and include within the certification application. Information on our certification program may be found on our website at: http://www.swrcb.ca.gov/northcoast/water_issues/programs/water_quality_certification.shtml.

Concluding Comments

Regional Water Board staff recognize the potential conflicts between compliance with the National Marine Fisheries Service Biological Opinion and the Basin Plan water quality standards that the Fish Flow Project poses. As summarized above, we are concerned that the Project may contribute to violations of some water quality standards that apply to the Project area. Further, Regional Water Board staff expect the Fish Flow Project EIR to include qualitative and quantitative (i.e. statistical) assessment of whether the Project will cause violations of water quality standards and to include appropriate measures, as necessary, to mitigate identified impacts to these water quality standards.

Regional Water Board staff are available to consult with Water Agency staff in identifying appropriate measures to mitigate potential water quality violations caused by the Project.

Again, we thank you for the opportunity to comment. We look forward to continuing to work with Water Agency staff on this Project in our efforts to protect water quality. If you have any questions regarding these comments, you may contact me or Matt St. John at (707) 570-3762 or MStJohn@waterboards.ca.gov.

Sincerely,

Original signed

Catherine Kuhlman
Executive Officer

101115_MSJ_FishFlowProject_EIRCommentLetter

cc: Scott Morgan, State Clearinghouse, P.O. Box, 3044, Sacramento, CA 95812
Re: SCH No. 2010092087

Barbara Evoy, Division of Water Rights, State Water Resources Control Board, P.O. Box 2000, Sacramento, CA 95812

Attachment 1
Assessment of Fecal Indicator Bacteria in the Lower Russian River

Regional Water Board staff assessed fecal indicator bacteria (FIB) samples collected from the Russian River for possible effects from variation in stream flow. FIB data for total coliform, E. coli, and enterococcus were compiled from several sources for the assessment.

SCWA conducted water quality monitoring at fifteen (15) sampling locations along the mainstem of the Russian River from May 28, 2009 through October 1, 2009. Samples were also collected by Regional Water Board staff at these same locations during 2009 for the routine beach assessment program. Regional Water Board staff also assessed historical FIB data (1995-2008) collected at six (6) sample locations within the Project area. Nearly 2,000 FIB data samples were available for this assessment (Table 1).

Table 1. Number of Fecal Indicator Bacteria data samples assessed

Location	Total Coliform		E. coli		Enterococcus	
	1995-2008	2009	1995-2008	2009	1995-2008	2009
Camp Rose	177	27	95	27	41	27
Healdsburg Memorial Beach	211	27	103	27	66	27
Steelhead Beach	83	27	81	27	30	27
Forestville Beach	10	27	10	27	10	27
Johnson's Beach	166	27	87	27	30	27
Monte Rio Beach	166	14	88	14	30	14

Data Assessment

The purpose of the Water Agency 2009 sampling was to assess whether the ambient FIB concentrations changed due to the reduction in flow resulting from the minimum flow requirement variance. Regional Water Board staff's assessment includes: (1) visual comparison of 2009 FIB concentration data to historical data, (2) linear regression between stream flow and FIB concentration, (3) FIB load durations curves, and (4) trend analysis.

While there is considerable variability in observed FIB concentrations, both spatially and temporally, within the Project area, Regional Water Board staff's assessment detailed below indicates that some of this variability is correlated with flow conditions. Lower flows appear to result in higher FIB concentrations, and violations of bacteria objectives and beach posting thresholds, in some instances.

Visual Comparisons

Box plots of the FIB data collected in 2009 are visually compared to box plots of all years of historical data collected at each site (Figures 1 – 6). Box plots show data set medians, quartiles, and outliers. The visual comparison suggests that with a few exceptions there is no large apparent difference between FIB concentrations collected in 2009 as compared to past samples collected at each location.

Figure 1. Comparison of the Distribution of FIB Concentrations Measured at Camp Rose.

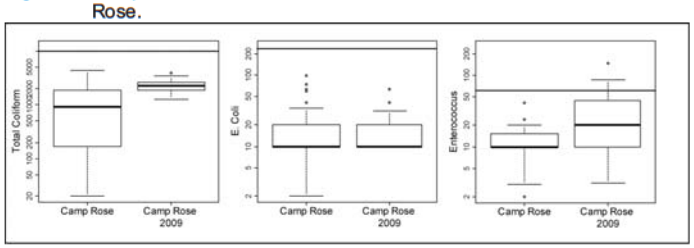


Figure 2. Comparison of the Distribution of FIB Concentrations Measured at Healdsburg Memorial Beach.

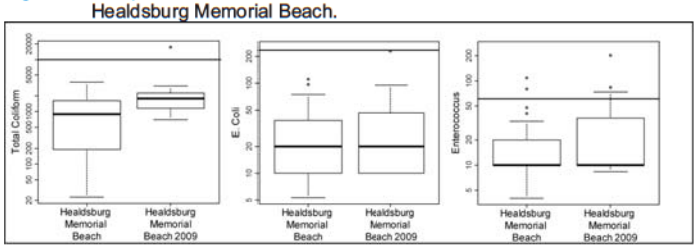


Figure 3. Comparison of the Distribution of FIB Concentrations Measured at Steelhead Beach.

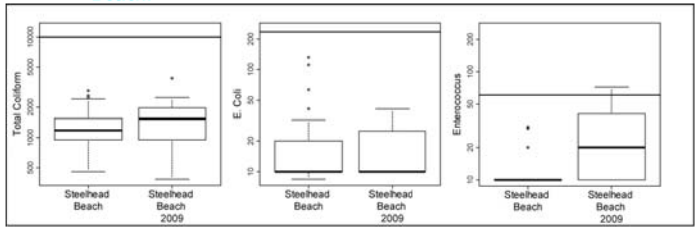


Figure 4. Comparison of the Distribution of FIB Concentrations Measured at Forestville Access Beach.

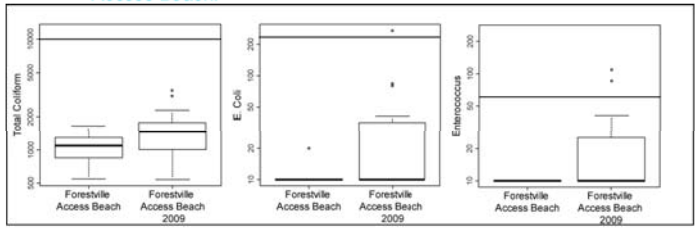


Figure 5. Comparison of the Distribution of FIB Concentrations Measured at Johnson's Beach.

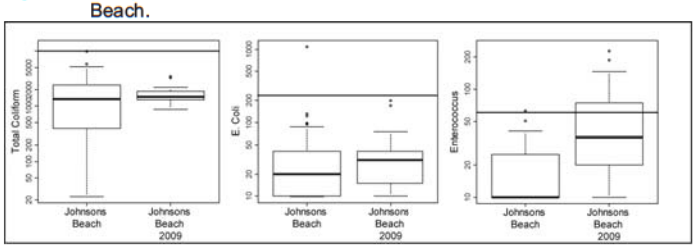
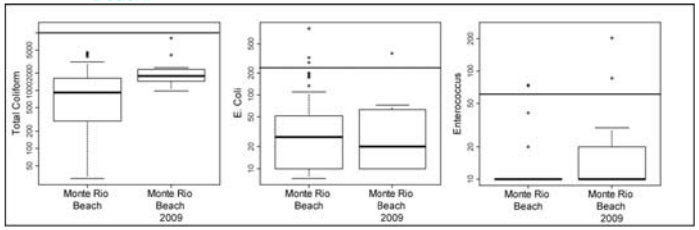


Figure 6. Comparison of the Distribution of FIB Concentrations Measured at Monte Rio Beach.



Linear Regression

The relationship between stream flow and FIB concentrations was assessed using linear regression. Daily stream flow data from the nearby U.S. Geological Survey (USGS) gauging station were matched with each FIB sample. FIB data from Camp Rose and Healdsburg Memorial Beach were compared to daily flows recorded at the USGS gauge near Healdsburg (#11464000). FIB data collected at the other four locations were compared to daily flow recorded at USGS gage near Guerneville (#11467000).

Data were log-transformed to address the normality distribution requirement of regression analysis. Visual inspection of the frequency distribution histograms show that log-transformation of the FIB data resulted in a distributions more normally distributed (Figures 7-10).

Figure 7. Frequency Distribution of Russian River Stream Flow Measurements at USGS Gauges near Healdsburg and Guerneville.

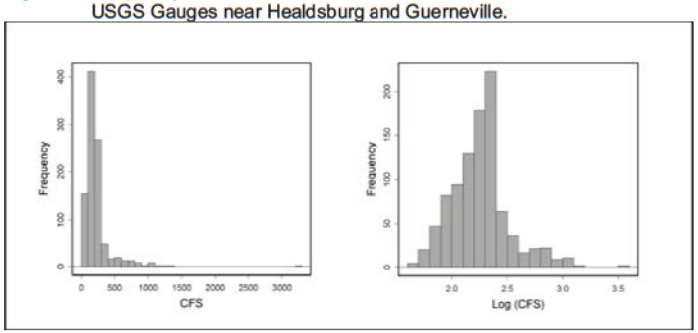


Figure 8. Frequency Distribution of Total Coliform Concentrations at all 6 Sites

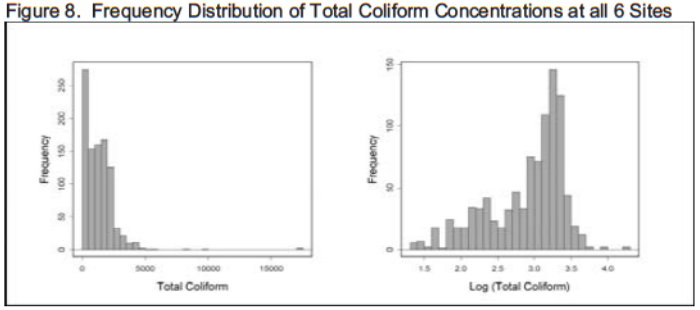


Figure 9. Frequency Distribution of E. coli Concentrations at all 6 Sites

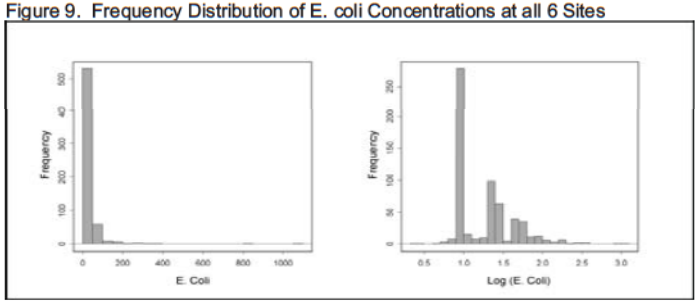
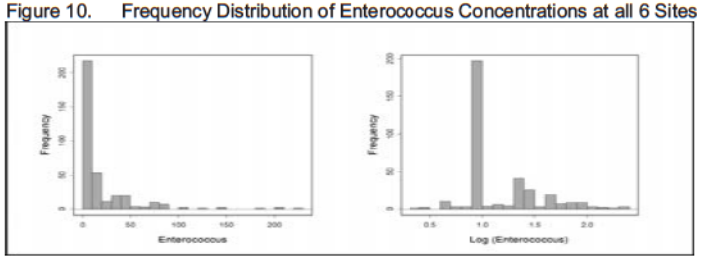


Figure 10. Frequency Distribution of Enterococcus Concentrations at all 6 Sites



Linear regression models were fitted using the Pearson least squares approach with the log-transformed FIB and flow data. Several of the regression analyses show a statistically significant relationship between flow and FIB concentration (Table 2). Most of these significant relationships explain less than 10% of the variance between the variables. However, several locations show a larger influence of flow on FIB concentrations. For example, analysis of enterococcus concentrations collected at Camp Rose show that flow explains nearly half of the variation. The negative slope of the regression line indicates that lower flows result in higher ambient concentrations.

Table 2. Relationship between Stream Flow and Fecal Indicator Bacteria Concentration. **Bold** font indicates a statistically significant regression.

FIB	Site	Explained Variance (%)	Probability	Slope
Total Coliform	Camp Rose	**3%**	**0.02**	-0.37
	Forestville Access Beach	**27%**	**0.00**	0.52
	Healdsburg Memorial Beach	0%	0.67	0.00
	Johnson's Beach	**4%**	**0.00**	-0.42
	Monte Rio Beach	1%	0.17	-0.21
	Steelhead Beach	**4%**	**0.04**	0.14
E. coli	Camp Rose	**4%**	**0.02**	0.19
	Forestville Access Beach	0%	0.71	0.11
	Healdsburg Memorial Beach	1%	0.21	0.13
	Johnson's Beach	0%	0.86	-0.02
	Monte Rio Beach	2%	0.16	0.24
	Steelhead Beach	0%	0.60	0.04
Enterococcus	Camp Rose	**46%**	**0.00**	-1.06
	Forestville Access Beach	1%	0.57	-0.14
	Healdsburg Memorial Beach	**6%**	**0.02**	-0.36
	Johnson's Beach	4%	0.13	-0.33
	Monte Rio Beach	0%	0.90	0.03
	Steelhead Beach	**15%**	**0.00**	-0.41

Load Duration Curves

Load duration curves are a useful tool identifying pollutant problems over the entire flow regime of a river (USEPA, 2007). A load duration curve provides a visual display of the relationship between flow and pollutants, like FIB. The load duration curve presents the frequency and magnitude of FIB measurements along with the allowable loads derived from water quality standards and stream flow data.

First, *flow* duration curves were generated for USGS Russian river flow gauging stations, near Healdsburg (#11464000) and near Guerneville (#11467000). The flow durations curves for the two USGS gauges were developed using daily flow measurements recorded from 1939 to present (Figures 11 & 12).

Figure 11. Flow Duration Curve for Russian River near Healdsburg (#11464000)

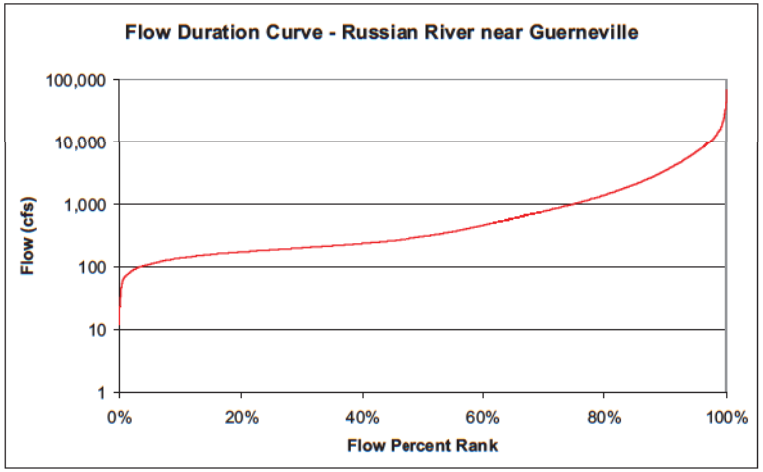
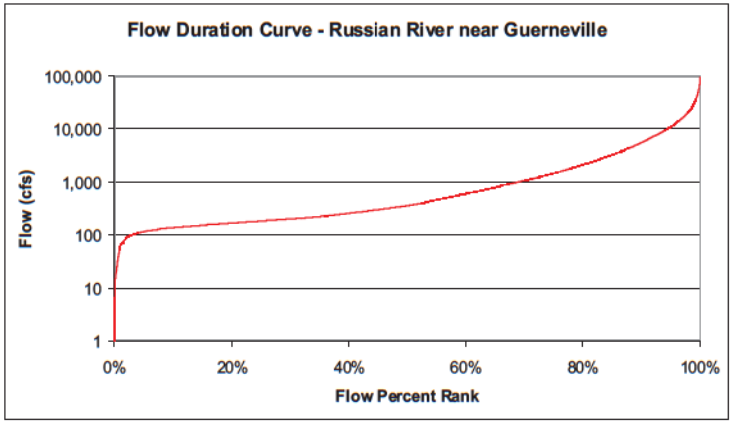


Figure 12. Flow Duration Curve for Russian River near Guerneville (#11467000)



Second, *load* duration curves were prepared for each sampling locations from the measured FIB data and the daily stream flow (Figures 13 - 18). FIB data from Camp Rose and Healdsburg Memorial Beach were compared to daily flows recorded at the USGS gauge near Healdsburg (#11464000). FIB data collected at the other four locations were compared to daily flow recorded at USGS gauge near Guerneville (#11467000). The allowable loads are shown as the solid curve lines; the allowable loads were derived from the water quality thresholds used for beach posting by Sonoma County Health Services (DHS, 2006): (1) Total coliforms not to exceed 10,000 MPN/100mL, (2) E. coli not to exceed 235 MPN/100mL, and (3) Enterococcus not to exceed 61 MPN/100 mL. The results show that exceedance of allowable loads within the Project area tend to occur during periods of lower flow.

Figure 13. Total Coliform Load Duration Curve for Russian River near Healdsburg

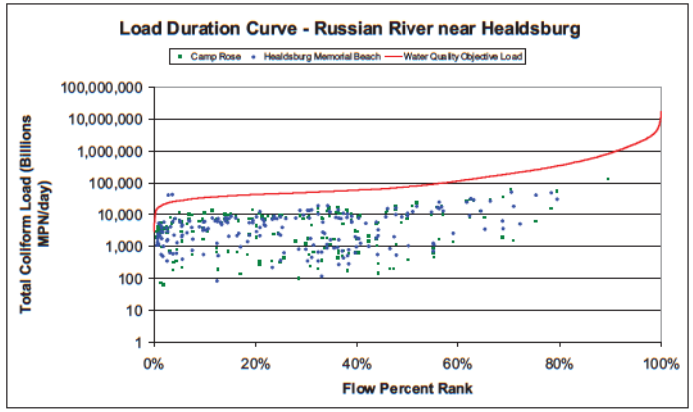


Figure 14. Total Coliform Load Duration Curve for Russian River near Guerneville

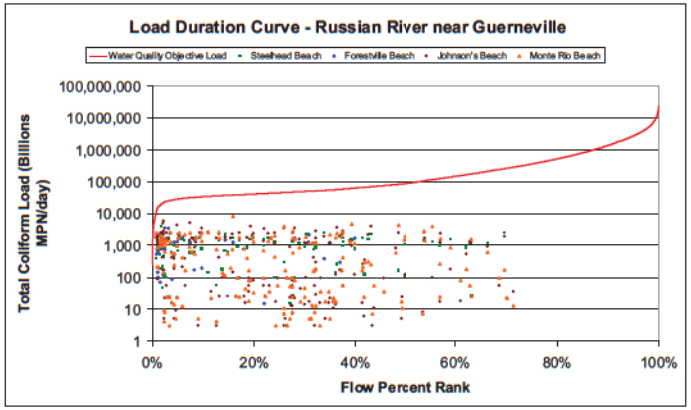


Figure 15. E.coli Load Duration Curve for Russian River near Healdsburg

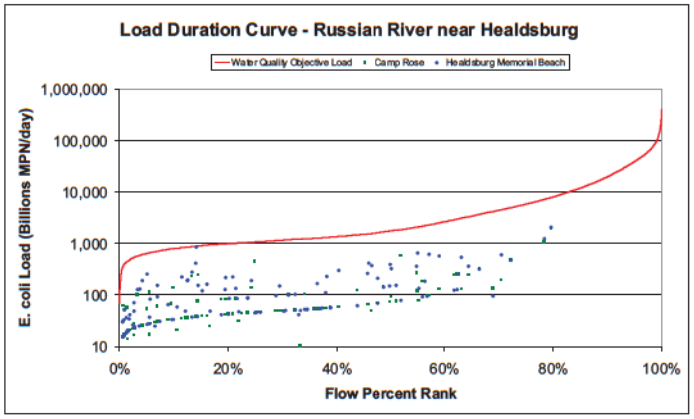


Figure 16. E. coli Load Duration Curve for Russian River near Guerneville

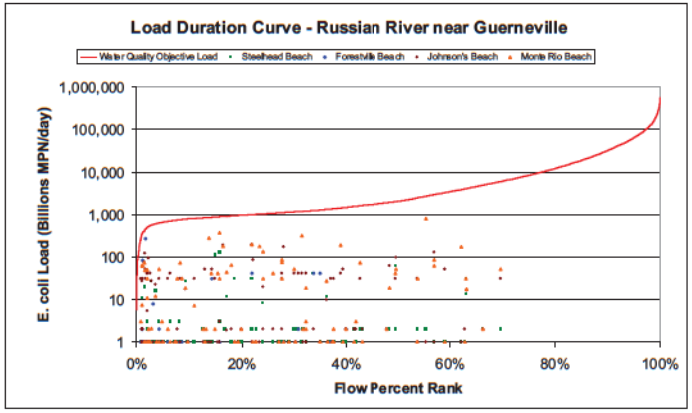


Figure 17. Enterococcus Load Duration Curve for Russian River near Healdsburg

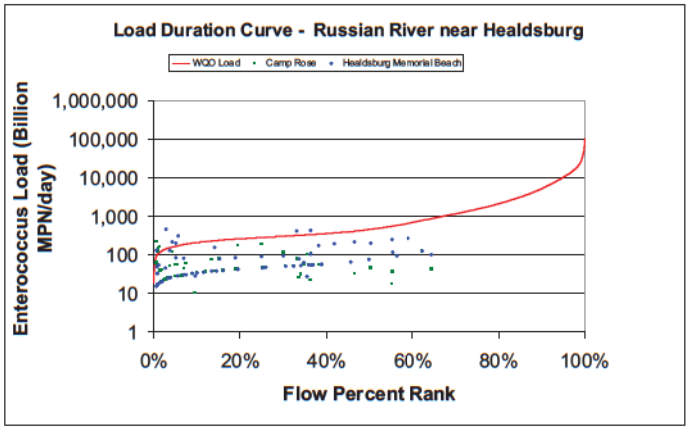
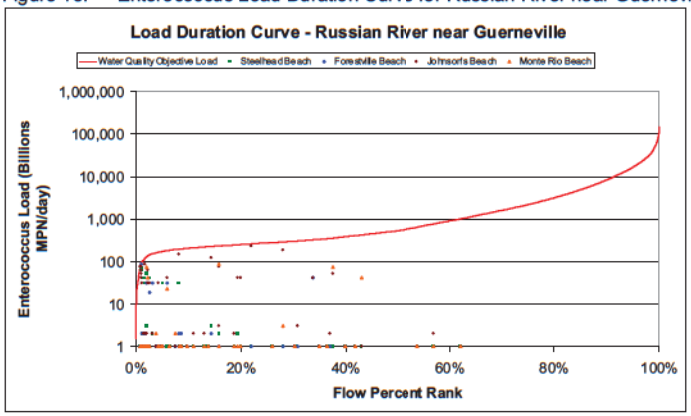


Figure 18. Enterococcus Load Duration Curve for Russian River near Guerneville



Trend Analysis

Trend analysis was conducted for FIB concentrations at each of the six monitoring stations within the Project area using current and historical data. Water quality data possess distributional characteristics that generally require specialized approaches to trend testing. Water quality data sets can contain censored (less than) values, outliers, multiple detection limits, missing values, and serial correlation. These characteristics commonly present problems in the use of conventional parametric statistics based on normally distributed data sets. The presence of censored data, non-negative values, and outliers generally lead to a non-normal data distribution which is common for many data sets. These skewed data sets require use of specific non-parametric statistical procedures for their analysis. Nonparametric statistical tests are more powerful when applied to non-normally distributed data, and almost as powerful as parametric tests when applied to normally distributed data (Helsel and Hirsch, 2002).

The nonparametric Mann-Kendall test for linear trend (Helsel et al. 2006) was used to evaluate whether FIB concentrations have increased or decreased significantly since the base year. The test is non-parametric, rank order based, and insensitive to missing values. Sen's slope estimator (Sen, 1968) was used to estimate the magnitude of change over time when a significant trend was observed. Sen's slope estimator is a non-parametric method that is insensitive to outliers and can be used to infer the magnitude of a trend in the data. Sen's slope estimator is not greatly affected by gross data error or outliers, and it can be computed when data are missing. Sen's slope estimator is closely related to the Mann-Kendall statistic in that all possible slopes are calculated between all possible data pairs and the resulting median slope is the Sen slope. The Sen's slope estimator was used to estimate the slope for the Mann-Kendall test.

The dataset contains FIB concentration measurements with levels below the detection limit of the analytical method. These values were assigned the value of the detection limit. Data sets having large numbers of values below detection limit (BDLs) may create statistical problems for trend analyses. The Mann-Kendall test for trend adjusts variance estimates upward for ties in magnitude. Since BDL values in the raw data set produce such ties, trend analyses of data sets with high percentages of BDLs will be based upon greater variances than those without BDLs. Thus, the power of the trend analyses for the data sets with BDLs are reduced compared to those without detection limits censoring. If the percentage of BDL observations is greater than 50, it is reported there are too many observations below the detecton limit to determine the presence or absence of trend.

Trends in FIB concentrations were evaluated for the effect of flow (Table 3). Several of the sites show increasing trend in FIB concentrations. These trends may be due to natural trends in flow due to climate. For example, a trend may be observed if the last

few years in a set of data were collected during drought conditions with lower flows. The effect of the lower flows on the apparent trend can be addressed using the relationship observed between flow and FIB concentration. The regression equation resulting in statistically significant relationship between flow and FIB was applied to the data. The residuals resulting from the difference of the predicted values from the observed value were tested for trend. The results indicate a trend without the influence of flow.

Trends of FIB concentrations were also evaluated by removing the effect of flow from those sampling locations with a statistically significant relationship to flow. The residuals from the significant regression equations derived above were used to assess trend without the influence of flows. Only those locations with a relationship between a FIB and flow could be assessed for flow influence on FIB trend. Accounting for this flow effect did not change the detection of trend in the FIB data for most locations indicating that the flow did not influence observed trends. However, removing the flow effect did result in removing the observed trends for each FIB at Camp Rose.

Table 3. Trends Statistics for Fecal Indicator Bacteria Concentrations

FIB	Site	Probability	Trend Slope	Trend Inclination
Total Coliform	Camp Rose – with flow influence	<0.01	163.3	Increasing
	Camp Rose – without flow influence	<0.01	-0.001	Decreasing
	Forestville Access Beach – with flow influence	0.51	-61.7	None
	Forestville Access Beach – without flow influence	0.70	-38.4	None
	Healdsburg Memorial Beach	<0.01	105.2	Increasing
	Johnsons Beach – with flow influence	<0.01	158.4	Increasing
	Johnsons Beach – without flow influence	<0.01	62.0	Increasing
	Monte Rio Beach	<0.01	128.9	Increasing
	Steelhead Beach – with flow influence	0.56	14.5	None
	Steelhead Beach – without flow influence	0.29	25.4	None
E. coli	Camp Rose – with flow influence	0.34	0.0	None
	Camp Rose – without flow influence	<0.01	-0.001	Decreasing
	Forestville Access Beach	0.49	0.0	None
	Healdsburg Memorial Beach	0.06	0.0	None
	Johnsons Beach	0.59	0.0	None

FIB	Site	Probability	Trend Slope	Trend Inclination
	Monte Rio Beach	0.04	-0.7	Decreasing
	Steelhead Beach	0.53	0.0	None
Entero-coccus	Camp Rose – with flow influence	<0.01	0.6	Increasing
	Camp Rose – without flow influence	0.19	0.00	None
	Forestville Access Beach	0.08	0.0	None
	Healdsburg Memorial Beach – with flow influence	0.18	0.0	None
	Healdsburg Memorial Beach – without flow influence	0.01	0.0	None
	Johnsons Beach	0.01	3.3	Increasing
	Monte Rio Beach	0.95	0.0	None
	Steelhead Beach – with flow influence	<0.01	0.0	None
	Steelhead Beach - without flow influence	0.133	0.0	None

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August 30, 2010

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Dear Mr. Shu:

This letter is being submitted on behalf of Russian River Watershed Protection Committee in response to your Agency's request for information on the 2012 303(d) List. We had emailed a partial submission to you on July 15, 2010, with three attachments, but we are resubmitting that information with this packet so it will be a complete submission. Our comments address circumstances in the Laguna de Santa Rosa, a major tributary to the Russian River, and the lower Russian River from the confluence of the Laguna/Mark West Creek into the Russian River and down to the Estuary.

We are concerned citizens who are neither scientists nor lawyers, but it is our intent to submit photographs, testimonies, reports, Regional Board documents, etc. to make the case that the Laguna de Santa Rosa should be listed for the invasive plant, Ludwigia, and that the lower Russian River (Forestville to Duncans Mills) should be listed for nutrients (The Laguna is already listed for nutrients.)

In reviewing the requirements for submitting data for the 303(d) list, we are finding it difficult to document our submission in every detail requested (specific camera settings, etc). Also, as ordinary citizen activists, we are not able to provide scientific data with any authority and so we are relying for the most part on photographic evidence. The photos submitted with this report are representative of hundreds that we have on file. If more pictures become

necessary later on, we would be happy to provide them (same locations, but different angles, magnifications, etc.) We can also give more information on specific photos as per request.

We would also like to note that RRWPC fully supports the Coast Keeper Alliance submission on the 2010 303(d) process, especially as it relates to listing all water bodies for pollution and pollutants, water flows as they impact water quality, and impacts of global warming on flows and water quality.

RRWPC Standing:

Russian River Watershed Protection Committee (RRWPC) is a nonprofit public benefit corporation with over 1000 supporters on our mailing list and hundreds of other supporters in the community whom we have not identified. We have been in existence for over 30 years and have been tracking water quality issues all that time. We regularly write for the Sonoma County Gazette and over the years have had numerous letters and columns in the Press Democrat and most other local newspapers. We network regularly with other water activists and are active members of the Sonoma County Water Coalition.

We are located in the lower Russian River (Guerneville), an incredibly beautiful recreational area that hosts visitors from all over the world. Besides the river, we are home to ancient redwood forests and beautiful wooded hillsides. We enjoy a watershed environment that is unique to the Northern California area. Unfortunately, the lower river is also the recipient of many water quality problems caused by human-caused degrading land use activities such as gravel mining, excessive and uncontrolled water diversions, timber harvest activities, riparian destruction, wastewater discharges and polluting agricultural practices, etc. The survival of three salmonid fish species has been declared at serious risk.

RRWPC focuses on water quality issues that affect our section of the river. We attend most Regional Board meetings held in our area and have provided extensive testimony over the years to both that Board and the State Water Resources Control Board (Water Board) on water quality and quantity issues. We have especially emphasized the impacts of wastewater discharges from centralized sewage treatment systems. For the last several years, our attention has turned to the water quality impacts of lowered flows.

Decision 1610 recommended flow changes

We are particularly concerned now that the Sonoma County Water Agency, under direction of the National Marine Fisheries Service's 2008 *Biological Opinion*, has and will apply to the State Water Board for both Temporary Urgency Changes (annually until permanent change is issued) and Permanent Changes to Decision 1610, State law that governs Russian River flows. Furthermore, the

Biological Opinion orders SCWA to petition the State to lower summer flows by as much as 44% as measured at the Hacienda Bridge.

We believe that further permanent water quality degradation has and will result from these changes. (Our concerns have been documented in our comments to the State Board on Petitions for both temporary and permanent changes, Attachments #1 and #2.) The Russian River is already listed under the 303(d) list for temperature, sediments, and pathogens (pathogens listed only between Guerneville and Monte Rio and at Healdsburg). When low flow is added to the mix, you have a recipe for extensive nutrient and pathogen pollution, which is exactly what is happening now. (The Biological Opinion failed to address expected water quality impacts to the lower river resulting from lowered flows as measured at Hacienda, but SCWA as lead agency, will develop an environmental impact report to address permanent changes to Decision 1610.)

Last year's summer flows were extremely low, especially in August, and we took weekly pictures of the lower river from early June through early October to document extensive nutrient pollution. (Minimum summer flow as measured at the Hacienda Bridge is normally 125 cubic feet per second (cfs). The July, 2009 average was 95 cfs, August was 63 cfs and September 80 cfs. according to SCWA data) We also documented the impact of the opening and closing of the river's mouth on the Monte Rio Beach.

Representative pictures appear in a report we assembled entitled, "*RRWPC 2009 Photo Project*" (Attachment #3). Photos in this report show extensive nutrient pollution in the lower Russian River, including many forms of algae and extensive outcroppings of invasive Ludwigia. The Regional Board does not recommend listing the lower river for nutrients, although they are well informed of the problems. This may be more a consideration of funding inadequacies, than water quality need.

The compelling reason for requesting that the river be listed for nutrients, is that both Ludwigia and nutrient pollution proliferate in conditions of low flow, high temperatures, inadequate riparian coverage, excessive sediments, and generally degraded conditions, all of which exist in both the Laguna and much of the lower Russian River. By making low flows permanent, as is the intention of the Biological Opinion, these impaired conditions would be greatly exacerbated. They need to be addressed. Summer temperatures in the lower river average 20 to 25 degree Celsius as reported by SCWA's regularly collected data (Example: Attachment #4).

Laguna impacts on Russian River.....

The Laguna joins Mark West Creek in a field near River Rd. between Trenton-Healdsburg and Slusser Roads. Windsor Creek joins Mark West near Trenton-Healdsburg Rd. and River Road, a little bit downstream of the Laguna/Mark

West Creek confluence. Mark West Creek then travels about two miles to where it joins the Russian River right as the river comes down from the north to make its major bend heading west. (near the town of Forestville) These tributary watersheds make up about 21% of the flow in the 110 mile Russian River basin. (*I have been looking for a clear map of this confluence and could not locate one. The confluence can be seen on Google Earth at 38N29 122W53.*)

This is also close to the location for the Sonoma County Water Agency's diversion and distribution facility that serves eight major, mostly urban contractors who sell water to approximately 600,000 people. The Agency holds water rights at four locations to divert up to 75,000 acre feet a year. (*Collection wells take water from about 60-80 feet under ground and are not influenced by surface water flows.*) Starting slightly upstream of the SCWA facility and all the way to Healdsburg, about a dozen gravel pits, several of which have been converted to recreational use, are located. (*These can be clearly seen on Google Earth also.*) There have been several breachings of these pits over the years and one of the pits has been used to store Healdsburg's wastewater for that time. Concern has often been expressed about the loss of the natural gravel aquifer and the potential need to construct an extraordinarily expensive disinfection facility should the aquifer's storage capacity become inadequate. New gravel mining projects are currently being proposed.

The Laguna de Santa Rosa itself has about a dozen tributaries that drain from the urban areas. Other major tributaries are affected mostly by agricultural land use, although the main stem of the Russian travels north through Healdsburg, Cloverdale, Ukiah, etc. All of these tributaries contribute vast amounts of sediments, nutrients, pathogens, and other pollutants that ultimately are transported and get deposited in the lower river, with the Laguna probably the most egregious contributor. This is an especially serious problem coming from storm water runoff, but is currently starting to be addressed through a new MS4 Permit by the Regional Board.

The USGS Hacienda Gauge that measures flow is located about 3-4 miles downstream of the Laguna de Santa Rosa/Mark West Creek/Windsor Creek confluence with the Russian River and about 4-5 miles upstream of the town of Guerneville. Mark West Creek and Windsor Creek drain large areas to the north and northeast and have their own water quality problems, which we will not address here, exacerbating existing water quality degradation in the lower river. (*For about 30 years, Santa Rosa was allowed to discharge 5% of river flow as measured at Hacienda, which is about 12 miles downstream of their point of discharge. The 5% was based on flow that included their discharge, which once got as high as 150 million gallons in a single day. It was not uncommon for daily discharges during a storm to reach 50 mgd.*)

The Laguna de Santa Rosa, for many years the prime receptor for huge volumes of Santa Rosa's wastewater discharges (up to four billion gallons a year including wastes generated by Cotati, Sebastopol, and Rohnert Park) is severely degraded and listed on the 303(d) list for nitrogen, phosphorus, temperature, dissolved oxygen, sediments, mercury, and in some locations, pathogens.

In a Regional Board Interoffice Communication to Bob Klamt, intended to clarify the impact of Santa Rosa's nutrient contribution to the Laguna while discharging, Cathy Goodwin states on March 10, 1994, "*Nutrient concentrations increased at the two Laguna stations down-gradient of the City's Delta Pond discharge: Laguna at River Road and Mark West Creek at Trenton-Healdsburg Road.*" Also, "*In the Russian River, nutrient concentrations increased at the two stations down-gradient of the Laguna's confluence with the Russian River.*" (Attachment #5)

In the summer, pollutants and nutrients becoming very concentrated in the low-gradient Laguna flow and have resulted in ever expanding and extremely excessive Ludwigia and algal problems. The algae, Ludwigia, excessive nutrients, dissolved oxygen, and excessive temperatures, all work together synergistically to exacerbate problems created separately by individual impairments.

This complexity is described in the following report on pages 9-10 of the Interim Staff Report from the Regional Board on January 27, 1993 (Attachment #6): "*Nutrient cycling in a stream system is complex and tied to the various interrelationships of primary producers (algae and aquatic macrophytes), nutrient inflow from surface and ground water and waste discharges, sediment-water interactions, and nutrient outflow (residence time in the stream). At any given point in time the various nutrient forms are a result of the actions of all those factors. The primary relationships in nutrient cycling are in plant productivity tying up the available nutrients, settling of particulate matter containing those tied-up nutrients (organic nitrogen and phosphorus), and release of the nutrients via decomposition in the sediments. Phosphate generally tends to bind to particulates if they are available and fall out of the water column. Nitrate is more mobile and tends to dissolve in the water. Both nutrients are most readily available in dissolved form.*"

The presence of the Ludwigia is a culmination of a long-standing problem and in turn then creates additional ones. It invites mosquitoes that carry West Nile Virus and possibly other pathogens. It chokes waterways and eliminates biodiversity. It is almost impossible to fully remove and it spreads profusely everywhere it goes where conditions are right. It likes the same conditions as algae: low flow, shallow depth, warm water, sunlight, and lots of sediment. And when the vegetation dies off, the biomass remains if not flushed out by fast

moving flows, only to feed more mass when conditions are ripe again. During summer in the Laguna such conditions commonly occur.

Ludwigia (Laguna de Santa Rosa)
Ludwigia has been rampant in the Southwest part of the Laguna and is rapidly spreading. Numerous experts and agencies have openly acknowledged the extent of the problem.

The Sonoma County Water Agency's May 12 2005 document entitled "*Frequently Asked Questions about Ludwigia and West Nile Virus*", states; "***Ludwigia has spread very rapidly in our watershed over the past 10 years. In areas where it has taken hold, it has almost completely smothered native wetland plants. Summertime dissolved oxygen levels in Ludwigia areas are so low that many fish species cannot survive. Open-water areas favored by waterfowl are choked with this weed, greatly reducing their habitat value. Waterways are obstructed by the accumulated perennial biomass, which may also trap sediment and debris, contributing to ongoing flood-control issues. Biomass doubles in 15-20 days in slow-moving waters, and it is estimated that there is now more than 10,000 tons (20 million pounds) of accumulated Ludwigia biomass.***" (emphasis added) (Attachment #7)

The opening paragraph of the Laguna Foundation's "*Ludwigia Control Project Final Report*" January, 2008, *states, "Ludwigia sp. is a non-native invasive aquatic plant from South America that has invaded the Laguna de Santa Rosa watershed. The scale of the invasion threatens water quality, biodiversity and channel capacity and hampers efforts to control mosquitoes. The Ludwigia Control Project (LCP) was a three-year effort to reduce the extent and density of the Ludwigia sp. in two of the worst affected areas of the Laguna de Santa Rosa. Spearheaded by the Laguna de Santa Rosa Foundation, the general approach included application of aquatic herbicide followed by mechanical removal of biomass. The total project area comprised 5.3 miles of channel and 99 acres of floodplain.*" (Attachment #8)

RRWPC attended meetings of the Task Force established to address this issue and implement and oversee the project. Periodically we took pictures of the most infested area that is easily accessible. There are also several before and after pictures in the *Ludwigia Control Project Final Report* mentioned above. (Stony Point Rd. Bridge over Bellevue Wilfred Channel, just south of the Rohnert Park Expressway: This area can also be viewed at Google Earth: 38N25 and 122W49). (Attachments #15 & #16)

While we could not access the 111 acres of the Laguna Wildlife Area owned by CA Fish and Game, we did track the very visible Laguna as seen from the bridge on Occidental Road which is less than a mile upstream of the DF&G property. (Google Earth at 38N21 and 122W44) At no time before this year did we see significant

amounts of Ludwigia present from the Occidental Road Bridge. **Yet this year, after last year's very low flows, the creek has been almost totally covered with the invasive plant**. We provide pictures taken just recently in mid-August, 2010. (*It seems that where there are these extensive infestations, the only un-infested location is under the bridge itself although algae has been photographed in those areas. This appears to indicate that temperature and light and perhaps water depth are major factors in Ludwigia's spread.*) (Attachment #14)

In fact, the ***Conclusion*** of the Final Ludwigia Report states, "*The three-year effort to control Ludwigia through herbicide application and mechanical removal has yielded mixed results at considerable cost. The degree and duration of control are closely linked to physical conditions at the site and annual variations in temperature and precipitation. Clearly there continues to be a need to address to the underlying conditions that promote Ludwigia growth in the watershed. Long-term Ludwigia control will require systemic approaches that address the primary stressors in the Laguna. Reducing inputs of nutrients and sediment is paramount. This process will begin when the Regional Water Quality Control Board completes its TMDL pollution plan, sometime around 2011. Although measurable differences may be more than a decade away, it is a positive step.*" (*Note: as of the end of August, 2010, a great deal of work needs to be accomplished before the TMDL is complete. This work has barely begun, in fact very little work has been done on nutrient pollution, and a completion date of 2015 at this point would probably be optimistic.*)

The focus in the shorter term should shift to manipulation of physical conditions as part of larger restoration plans. Perhaps the most effective action will be water level manipulation. This entails creating conditions that promote either deep water or the absence of water during summer months. Methods may include targeted sediment removal, creation of low flow channels, and reduction of summer irrigation runoff. Because accumulated sediment is very likely enriched with nutrients, its removal in key areas will also serve to remove accumulated nutrients from the system. Because sediment removal will create considerable disturbance, it should always be accompanied by restorative actions such as establishment of riparian forest."

Over-irrigation of wastewater causes runoff….
It is important to emphasize the reference to irrigation runoff in the paragraph above. The highly Ludwigia infested Wilfred-Bellevue Channel (see pictures: Attachments #13, #15, #16) is immediately west of Rohnert Park. Rohnert Park generously irrigates their public facilities in the summer with wastewater. RRWPC has documented extensive runoff from their irrigation program which was inadequately overseen by Santa Rosa, the entity holding the Reclamation Permit and responsible for the wastewater.

After a complaint was filed, on March 30, 2010, the Regional Board issued a Notice of Violations regarding unauthorized recycled water discharges from Sonoma State University and from Rohnert Park (Attachment #9) The most recent contract between Santa Rosa and Rohnert Park defining terms of RP's

irrigation requirements was dated 1993, and clearly outdated. Furthermore, it was clear that the requirements in that document were not even being followed, or the runoff would not have occurred. It appears that until the complaint was filed, neither Regional Board nor Santa Rosa staff had been monitoring the requirements in the permit.

It is our understanding that Regional Board staff are imposing much more stringent monitoring and reporting requirements now on Santa Rosa and Rohnert Park and the issue is being addressed. Nevertheless, as irrigation with wastewater in all of the local cities is currently being greatly expanded, due to significant encouragement from the State's new Recycled Water Policy, there will be many future opportunities for this problem to increase throughout the area.

Since 2008, when the Laguna Foundation's report and pictures indicated that the Bellevue Wilfred Channel had been essentially cleared (*at a cost of over $2 million dollars and the use of a great amount of chemical herbicides*), we have been photographing that area. In 2009 and 2010, the invasive plant returned with a vengeance, is now worse than it ever was, completely filling the Channel where a creek once flowed, as portrayed in the several pictures taken very close to where the final pictures in the Ludwigia Report were taken in August, 2007. (Attachments #13, #15, #16)

While we have not surveyed all (or even most) Laguna streams for Ludwigia infestation, the seriousness of what we have seen, and the probable impacts to the lower Russian River, we are motivated to request a 303(d) listing for Ludwigia in the Laguna. As already noted, there has been a significant new infestation in the area around the Occidental Road Bridge, which is about five miles downstream of the Rohnert Park infestation.

Because the Laguna is already designated as having the multiple impairments that exacerbate the problem, the likely increase of an even greater infestation of Ludwigia is very imminent and deserving of the special attention a separate 303(d) listing would give it.

Development of a Conceptual Model….

In 2007, the Laguna Foundation published a study called, "*The Altered Laguna: A Conceptual Model for Watershed Stewardship*" (Attachment #10). This model was intended to serve as the organizing and launching document for the Laguna TMDL process.

The Report stated (p.51), "*As exotic invasive plants, such as invasive Ludwigia sp., increasingly take hold in native plant communities, they threaten native biodiversity by*

changing the native vegetation structural diversity, often completely 'taking over', not only out-competing native plants and establishing an extensive and expanding mono-culture, this process so fundamentally changes the original native ecosystem, causing the local extinction of organisms rightly linked to the original community structure and function (National Invasive Species Council 2001)." This report establishes a framework for identifying data gaps, system indicators, monitoring regimes, and restoration targets.

Page 2 states, "*In the highly complex Laguna de Santa Rosa watershed system, predictions are only possible by close examination of all system components. Our understanding of the linkages among these components is made tangible through a series of steps that progress from the conceptual model addressed in this report to dynamic modeling simulations in the near future.*" The report then goes on to define the various steps needed to obtain information that integrates and informs all the possible variables.

Phosphorus study of Santa Rosa's wastewater…

On January 28, 2000, Dan Wickham and Bob Rawson published a report entitled "*Phosphate Loading and Eutrophication in the Laguna de Santa Rosa*". This study quantified the amount of phosphorus loading into the Laguna from wastewater discharges. The information in this report was primarily responsible (we believe) for the listing of phosphorus on the 2002 303(d) list.

The report makes several critical findings, which are not only important for the existing listing for the Laguna, but the requested listing for the Russian River.

(page 6-7 of report):

1. It is affirmed that limiting phosphorus availability in lakes is the single, most important and necessary step to be taken now in eutrophication control.

3. Because all inputs are additive, and therefore potentially significant, all should be considered for control."

4. Municipal sewage is the major point source. All such discharges to lakes and other susceptible waters should be treated to reduce phosphorus content to realistic target levels.

6. Nutrient budgets should be established….

8. *Where slow flushing impedes improvement from curtailed phosphorus inputs, accessory steps to inactivate, harvest, or other wise retrieve nutrients from lakes much be considered.*

Wickham and Rawson demonstrated that (p.7), "*The average reading of phosphate concentration (measured as P) presented in the Subregional EIR prepared I 1996 equals 4.2 mg/L (Appendix I). It should be noted that typical concentrations of phosphate (as P) in most natural water bodies are less than ranges from 0.005-0.1 mg/L (Wetzel, 1983).*" The authors went on to estimate that Santa Rosa releases the equivalent of 2,300,000 lbs. of commercial fertilizer into the Laguna per year. (Attachment #11) *(We are just submitting part of this lengthy document, but the full report can be provided if requested.)*

Thankfully, the City sends most of its wastewater to the Geysers now (since 2004), but where did all that phosphorus end up? How much is still bound up in Laguna and Russian River sediments and the accumulated biomass currently sitting in our river bottom, feeding all the algae that proliferates ever more each year? Furthermore, we wonder how much phosphorus other wastewater dischargers are putting in the Russian River? If the Russian were listed for nutrients, this would have to be evaluated and addressed. (This will be addressed further in comments below.)

Photos demonstrating Ludwigia problem in Laguna….

We offer these pictures as examples of the severe Ludwigia problem in the Laguna. It is important to note that in every case, one could see water under the bridge; Ludwigia did not grow well in the cooler, darker water (perhaps deeper as well. This was visibly noted in the Final Ludwigia Report by the Laguna Foundation in Appendix I. Also, there is a good map of the area on page 3 of the Report. (Attachment #8)

Hinebaugh Creek: Pictures #1219 & 1377 taken on 8-11-10 on Labath St. in Rohnert Park just north of Rohnert Park Expressway. One picture is looking east and one west although I don't recall which is which. In any case, there is no Ludwigia in this creek at this location is about 2/3 mile upstream from Stony Point Bridge over the Bellevue-Wilfred Channel. (Attachment #12)

Bellevue-Wilfred Channel at Milbrae Bridge: (between Labath and Langner) in Rohnert Park: This is approximately two miles from the Stony Point location of this same creek. Picture #1229 looks south and #1380 looks north. They were both taken on 8-11-10. (Attachment #13)

Laguna de Santa Rosa from Occidental Bridge: (about eight miles north of Bellevue-Wilfred Channel at Stony Point) Pictures taken on August 8, 2010. Photos #1173/#1331 look south and #1192/#1300 look north. (Attachment #14)

Bellevue-Wilfred Channel from Rohnert Park Expressway, just east of Stony Point Rd. Pictures taken on 8-11-10. #1211 looks north and #1218 and #1364 both look south. These views are right around the corner from the Stony Point Rd. pictures and have the worst Ludwigia infestation. (Attachment #15)

Stony Point Rd. 1/8th block south of Rohnert Park Expressway: Pictures taken on 8-11-10 except for #1004 which was taken 5-2-10. #1359 is a picture of algae right under west side of bridge. Pictures #1004 and #1198 are looking toward the west and taken on the west side of the bridge. Pictures #1206 and #8226 were taken on the east side of the bridge looking towards the east. (Attachment #16)

Finally, we believe that it is extremely important to list Laguna Ludwigia because this invasive plant is rapidly spreading and threatens many miles of waterway. Furthermore, it can seriously impact the flooding situation downstream, as the Laguna serves as a storage area for the Russian River during floods and relieves the lower river area of many inches of flooding under normal conditions. We have not had a major flood since this plant has proliferated and we are very concerned about the damage it can do.

Lower Russian River Algae Problems….

As mentioned earlier, the Biological Opinion requires that the Sonoma County Water Agency (SCWA) apply annually to the State for Temporary Urgency Change Orders to lower required minimum flows designated in Decision 1610 until a permanent order is issued. The recommended flow that RRWPC is most concerned about is measured at the Hacienda Bridge and calls for a 44% reduction each summer from 125 cfs to 70-80 cfs.

It is particularly interesting this year we had a great deal of rain that then combined with a very cool summer. The reservoirs are full in late August and there could even be a problem with flooding if they don't get the levels down soon. (As I write this on August 28th, Lake Mendocino water supply pool is 86% full and Lake Sonoma is almost 93% full.) Even though the State issued the Order to lower flows in June, it simply has not happened because reservoir levels have been too high and more substantial releases needed to be made. Until about a week ago, flows at the Hacienda Bridge averaged about 170 cfs most of the summer. On August 28th the flow was 99 cfs. In addition, the creeks were generally flowing higher than normal and feeding the river as well.

The Biological Opinion does not concern itself with these complexities, but only with the specific water supply operations of the SCWA working jointly with the Army Corps of Engineers (ACOE). In order to try and save the steelhead, the

National Marine Fisheries Service (NMFS) wants the mouth of the river closed during the summer months so as to provide fresh water rearing habitat in the Estuary. The plan is to construct a barrier beach during the mouth's first natural closing, and leave it closed until mid-October. Because properties flood in the town of Jenner when the river gets too high, the plan is to lower flows in the entire river in order to accommodate the project.

This situation motivated us to institute a photo project last summer between June and September so we could visually document the lower river's condition during the low flows. We took weekly pictures at numerous locations and less frequent pictures at other locations between Forestville and Duncans Mills. What we observed was that the lower the flow, the worse the algae, especially when temperatures were high. The Russian River is already listed for temperature and sediment impairments along with pathogen impairments between Guerneville and Monte Rio. It made sense that beneficial uses would be impacted by severely lowered flows. (*There are two summer dams in Guerneville: one at Johnson's Beach and one at Vacation Beach downstream. These locations have plenty of water for recreation and we haven't noticed much algae except at Vacation Beach. See photos*)

As mentioned before, RRWPC published our 2009 Photo Project Report in June, 2010. (Attachment #3) That report included pictures of many kinds of algae and Ludwigia showing up in the river. The problem was worse in August, when flows at the Hacienda Bridge averaged 63 cfs. It was the third year of a draught period that left reservoirs at about half the normal level. Cities were forced to seriously conserve. Luckily it was a cool summer and no disasters occurred. We can anticipate a real problem however if there are two back-to-back years of low rain and high summer temperatures.

(We are not submitting separate photos for last year because we believe that the Photo Project provides examples of impairments that we saw. We could make additional photographs available, or the original digital versions of the ones in the Report, if requested. Also, we include a packet of testimonials about the condition of the river from our RRWPC supporters. Attachment #17)

Monte Rio affected by closed river mouth….

Last year we learned that the mouth of the river would be opened on Oct. 6th. We rushed to Monte Rio to get pictures of the water level before that occurred. Then the following day we went back and found water levels down about three to four feet. We have since heard reports from people who have floating docks in the Villa Grande area that the level can go down as much as five feet in places. (The amount of decrease may depend on the width of the channel at that location and depth of river.) The before and after pictures appear in our Photo Report.

On the day after the opening (10-7-09), we saw lines of algae marking the place where the water had been the day before. We reported the situation to the North

Coast Regional Board. Because we expressed concern about the possible presence of toxic blue green algae, staff told us they would send someone out to take samples. The worst algae we viewed occurred at the Kid's Beach in Monte Rio and by the Vacation Beach Dam (one mile downstream of Guerneville).

On Oct. 20th we got an email from John Short of the North Coast Regional Board stating that, "*Our staff went out to the river last Monday in response to your email. Algae was observed and collected at the kiddie swim area in Monte Rio. L Staff also visited the Vacation Beach site and collected samples there as well. Staff evaluation of the Monte Rio algae sample verified the presence of anabaena, a blue green algae in the neurotoxin family. The Vacation Beach sample was negative for blue green algae. We are contacting Sonoma County Health Department to alert them to these results. The populations of these algae tend to decline significantly in the fall due to lower temperatures and added flows.*" (Attachment #18) John and other staff later made other statements about this finding that expressed uncertainty about the results. RRWPC believes that whatever the results, enough uncertainty about the types and amounts of algae exists so that these areas should be tested periodically and perhaps regularly until more is known.

Serious algae problem downstream from Monte Rio Bridge….

Towards the end of July, 2010, we got an email from some physicians telling us about massive algae in their Monte Rio area. They sent pictures of some toxic algae down loaded from Wikipedia and wondered whether that was the same as what they saw near their homes? We did note that these pictures looked very similar to the ones we had put in our Photo Report on page 6: #7239 and page 8: #3311. (*We are attaching email we received with names removed.* Attachment #19)

We were invited to take photos from their ramp and they also sent us some early morning shots that clearly indicated that over half of the water surface was covered in floating algae. The pictures they sent in email were taken from their deck are Attachment #25. One of the physicians states in the email, "*The algae bloom this last week in our experience has been the worst we have ever seen. E. found some interesting links and the lyngbya in particular which is rampant does release dermatotoxins, that should cause real concern for those who use the waters for recreation. We look to you and your organization as to what can be done and the impact of the low flow decision. Thanks.*"

We notified Regional Board staff of the problem and were very pleased that they took our report seriously. Along with RRWPC board member Dennis O'Leary, I met with Matt St. John, Clayton Creager, Steve Butkus of the Regional Board staff and Walter Kruse and Jim Tyler of County Environmental Health Services at the Monte Rio Beach on July 27th. We also visited the private residence in the Monte Cristo area a mile downstream. Samples were taken and tested, but we did not

see whether they took samples of the algae that looked like the toxic algae in the pictures.

A report later identified the algae as two green algal filamentous species and not blue green algae. Staff's report of our meeting (Attachment #20) claimed, "*Based on visual assessment of the percent cover and density of algae at these locations, staff characterize the total algal biomass at these sites as high, but not uncharacteristic for this time of year.*"

We feel that this statement really minimizes the seriousness and scope of the problem. Everyone we spoke with who live in the area agreed that this season has been the worst. Furthermore, we don't know whether samples were taken representing all types of algae present. Interestingly, water levels were much higher in the Forestville area and most algae we photographed last year were more submerged and less visible to the eye.

At a meeting I attended of Northwood homeowners on August 28th, questions arose about the Russian River County Sanitation District (RRCSD), immediately upstream of the golf course around which the houses are located. I mentioned that I noted a quarter or half-mile stretch of Ludwigia along the same bank as the outfall downstream. People agreed that this could be a problem and one person told me that they have seen foam coming into the river from that location. It is also fascinating that the line of Ludwigia stops just downstream of the outfall and a little upstream of Northwood. (*We clearly remember that Cathy Goodwin stated on several occasions over the last several years that algae are very problematic in that location.)*

We have wondered for a long time whether the RRCSD and/or Northwood may be contributing more nutrient pollution in our area? Furthermore, immediately upstream of the Treatment Plant, and for about one mile where houses have septics and are not hooked up to sewer, we noticed no signs of nutrient pollution. Similarly, closer to the Monte Rio Bridge where non-sewered houses were located, there was also little nutrient pollution on the bank where the houses were located. Conversely, in Guerneville (though upstream of the Treatment Plant), where houses are hooked up to the sewer, there were numerous outcroppings of Ludwigia, although not as bad as in the Monte Rio area.

We believe that a thorough investigation of nutrients discharged by RRCSD and/or the golf course, and the impact they may be having on the lower river is called for. We also think it would be important to have a study documenting types of nutrient pollution (including Ludwigia), their density, and land use practices nearby. While we realize that as yet, numeric limits do not exist for

nitrogen and phosphorus, the Basin Plan clearly states: "*Water shall not contain biostimulatory substances which promote aquatic growths in concentrations that cause nuisance or adversely affect beneficial uses.*" We strongly believe that if the lower river is listed for nutrients, the Regional Board will have a much more reasonable basis for imposing strict nutrient constraints on RRCSD and any other dischargers. All public facilities near the river should be carefully checked as well.

Increased pollution over the years, a long time resident's view….

On August 13th, I visited Gary Getchell, local builder, whose family has lived in the Monte Rio/Monte Cristo area for generations. By that time, the surface algae had retreated due to cooler temperatures and higher winds. It was still possible to see mats of algae below the surface however. We talked about the frequent accusations that failing septics are polluting the lower river. While both of us acknowledge that there may be some failing septics, he made several cogent points about that issue and others that I would like to mention here.

- Septics are better now than before and many along the river have been upgraded. There has been very little new growth in the area and a lot of housing rehabilitation (building permits require septic upgrade) This point can be verified by the fact that dry weather flows to the Russian River County Sanitation District Treatment Plant have remained fairly constant for the twenty-five years of its existence. (Sewer District is "next door" to Monte Rio.)
- In 1985 tougher leach line regulations went into place giving better protection.
- Fifty years ago there was no algae. Urban areas were far less developed and there was much less wastewater and storm drain runoff being discharged. There was less agricultural development. Gary believes that much of the pollution is coming from upstream.
- Many species that used to be abundant on the river are now gone: frogs, pollywogs, tree frogs, fresh water eels, etc. Of course the salmon are almost gone also. Other species are becoming much less prevalent.
- There's been a significant drop in water level (some neighbors disagree on this, but Gary is basing it on his knowledge of where water levels are now compared to permanent features such as logs and trees and where they were before.).
- Finally Gary said that the algal mats on the bottom of the river, which are visible, are as much as three to four feet deep and growing worse all the time.

Follow up on 2009 Photographic Report….

We have taken many pictures in 2010 of the same river areas that appeared in our Photographic Report and new ones as well. These pictures serve as our evidence for the nutrient pollution we have been describing.

Hacienda: (Attachment #21)
West bank looking downstream from Hacienda Bridge: #1274 and #6980. Both were taken on 8-12-2010. River flow at this location was 178 cfs.

East bank looking upstream from Hacienda Bridge. #1449 taken 8-12-10 when flows at that location were 178 cfs. #8092 was taken on 8-16-09. Flows on that date at that location were 51 cfs. These two pictures visibly demonstrate the difference that occurs during much lower flows.

Monte Rio Beach to Vacation Beach: (Attachment #22)
View of South bank: #1297 taken .3 mile from Monte Rio stop sign next to theater (pull off on Hwy. 116) on 8-25-10 (no Ludwigia visible)

View of South bank: #1299, #1300, #1506, #1508 taken1.2 miles from Monte Rio stop sign on 8-25-10. This area just east of Northwood has a lengthy and solid line of Ludwigia and is immediately downstream of the RRCSD. (.3 mile further down the road: 1.8 miles from stop sign, there was a turn out and no Ludwigia was present) This solid patch of Ludwigia is unusual on the river. All of our other pictures indicate outgrowths in patches, not a straight line going for a relatively long distance. We estimate it was maybe one half of a mile or more.

Pictures of same area taken by Larry Hanson while canoeing down river between Monte Rio Beach and just east of Northwood Golf Course and just downstream of RRCSD on August 24, 2010: The 2009 Photo Report shows same location last year on page 10, #3200

- Just downstream of Monte Rio Beach: #P8240035 & P8240006/ Immediately past beach area, Ludwigia was very sporadic/can see lots of algae in this area/also low water in this area (Ludwigia mostly on north bank.)
- Between Monte Rio Beach and Northwood although location of specific photos is vague/P8240010, P8240025, P8240012, P8240029 Long line of algae and Ludwigia appears to stop just past Northwood Golf Course and is located on south bank.

Steelhead Beach: (Attachment #23)
Pictures taken on August 12, 2010, between the Boat Ramp and the Kid's Beach. #1248, #1251, #1414, #1431 River flows were around 178 cfs. This is a about 2-3

miles upstream of the Hacienda Bridge. There was a great deal of Ludwigia but not much algae was visible #7-31c taken by Tom Meldau and Shane McColgin shows patches of Ludwigia similar to this year. Last year flows were at 51 cfs this time of year. Can't tell if Ludwigia was worse last year in these photos.

Vacation Beach: (Attachment #24)
This is a relatively small beach with a parking lot with a boat ramp about a mile downstream of Guerneville. There is a road and a summer bridge. It is less than a mile upstream of RRCSD. There was a lot of heavy algae on the beach. I had been there three weeks earlier when water levels were higher and had not seen the algae. All pictures in this group were taken on August 25, 2010. I don't have exact Hacienda flow on this date, but on Aug. 22, 2010, the flow was 123 cfs and going down. Photos: #1316, #1323, #1517, #1520, and #1523. All pictures taken on beach and road just downstream of dam.

Villa Grande: (Attachment #25)
This is a small community one mile downstream of Monte Rio Beach and the location of the worst algae we saw anywhere. We took pictures at a private residence and this was one of the locations where Regional Board took samples and claimed this was ordinary filamentous green algae. Pictures #1144, #1150, and #1156, were all taken by me on July 23, 2010 on the dock of a private residence. The owner of the property provided photos #river5 and #river7 and they were both taken on July 30, 2010.

Conclusion:
This whole issue is a work in process. There is a great deal of information to come forward about water quality in the lower Russian River and we ask you not to close the door on information gathering.

There is going to be an environmental review on changes to Decision 1610 where all of these comments and much more will be submitted about the impacts of lowered flows on the Russian River.

Related to that, the State Board, during review of SCWA's Temporary Urgency Change Petition to lower flows in the Russian River in 2002, 2004, 2007, 2009, and 2010 asked for nutrient monitoring of the Russian River. Regional Board has admitted that nutrient data thus far collected has been inadequate, mainly because detection limits were too low. In 2010, more stringent guidelines for collecting data have been in effect, but we have been unable to attain the information for this paper. We anticipate that more information will become available in the near future.

The Regional Board has just begun the process of developing information on a Laguna TMDL. This is critical to addressing the Ludwigia issue, which we believe needs to be addressed in its own right, as we hope we have demonstrated.

USGS has been studying water quality in the lower river for years now and hopefully in some point in the near future a full report will become available, which we have not seen as yet.

Finally, one last issue we will add here, is that often people rely on major floods to flush out the river of nutrients and all the other toxic garbage that gets thrown in there. We have not had a major flood in a long time. We have been in a draught period most of the last five years. While 2009-10 rain season was a fairly good one, it did not produce a flood. Weather is becoming more and more unpredictable; we may be faced with a deluge next winter….or not! To count on such events to clean up our river is not a worthy option.

We urge you to seriously consider all we have said in this paper and we look forward to your response.

Sincerely,

Brenda Adelman: Chair
Russian River Watershed Protection Committee

Comment Letter G_RRWPC
Attachment 5

Comment Letter G_RRWPC
Attachment 5

Comment Letter G_RRWPC
Attachment 5

Comment Letter G_RRWPC
Attachment 5

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Attachment 5

Item 13

Russian River Regulatory & TMDL Efforts

an update to the North Coast Regional Water Quality Control Board

January 27, 2011

Water Boards

THE PRESS DEMOCRAT • WEDNESDAY, SEPTEMBER 29, 2010 THE REGION

FORESTVILLE

First Chinook salmon return

Number of spawning fish expected to increase, given favorable ocean conditions

By BOB NORBERG
THE PRESS DEMOCRAT

The first chinook salmon have passed through the Sonoma County Water Agency fish ladder in the Russian River at Forestville, the beginning of a fall spawning run that biologists expect to be the best in five years.

"This year it should be better; I would say in the range of 3,000 by the end of the season, maybe more," said Bill Sydeman of Petaluma, president of the Farallon Institute for Ecosystem Research.

"The conditions that determine their ocean survival in 2008 and 2009 were good, that means their survival should be pretty good."

Chinook, which are listed by the federal government as a threatened species, have been monitored on the Russian River for the past 10 years.

The number of chinook returning to the Sacramento River determines the ocean salmon fishing season, but regulators do take into account the Russian River return.

The peak number in recent years in the Russian River was 6,103 counted in 2003, and the least number was 1,125 in 2008. Last year, 1,801 were counted.

Sydeman said chinook return two years after migrating to the ocean as fingerlings, feeding on krill to survive initially and then on such small fish as juvenile rock fish, anchovies and smelt.

The fish that are returning now would have been in the ocean from 2007 to 2009, when the ocean was cold and feeding conditions favorable.

SALMON COUNT

Annual counts of chinook returning to the Russian River

2000	1,445
2001	1,383
2002	5,474
2003	6,103
2004	4,788
2005	2,572
2006	3,410
2007	1,963
2008	1,125
2009	1,801

Source: Sonoma County Water Agency

Chinook are the largest of the salmon and steelhead that return to spawn in the Russian River and its tributaries.

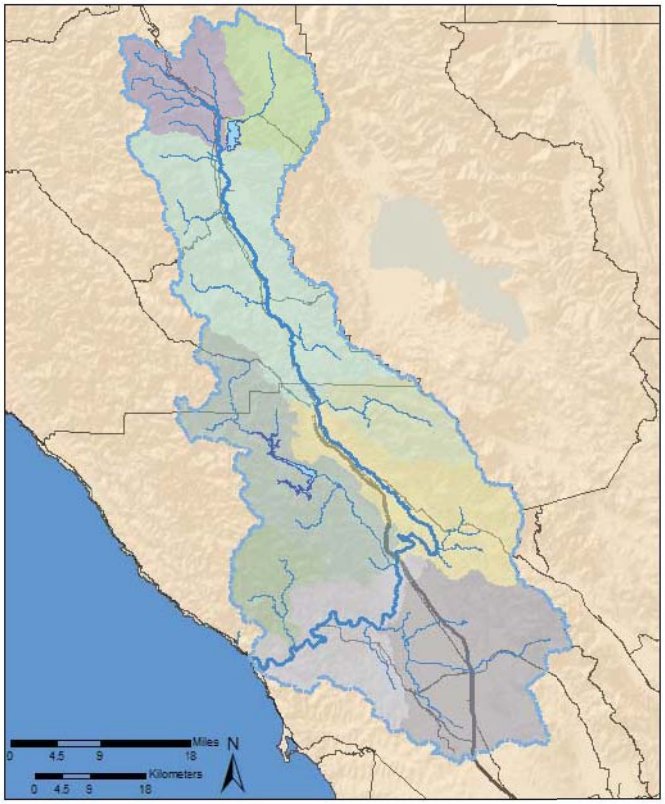
Three fish were photographed at the Water Agency's rubber dam at Forestville as the fish go through the fish ladders.

"We get fish usually the first week of September, but last year we didn't get fish until October because the estuary was closed," said Dave Manning, a senior environmental specialist with the Water Agency. "We did receive reports from biologists they had seen fish in the estuary in early September, and sportsmen have seen chinook in the lower river."

The sandbar at the mouth of the Russian River at Jenner, where the river forms an estuary, is now closed, but Water Agency workers are planning on digging an outlet channel either today or Thursday, depending on sea conditions.

After Oct. 15, the agency can dig a much deeper trench through the sand bar that will provide an even better channel for fish to enter.

You can reach Staff Writer Bob Norberg at 521-5206 or bob.norberg@pressdemocrat.com.



Russian River Watershed

Comment Letter G_RRWPC
Attachment 7

Topics

- Water Quality Concerns & Potential Sources
- Current Core Regulatory Efforts
  - Publicly-Owned Treatment Works
  - Wineries, Food Processors, & Dairies
  - NPDES Storm Water
  - Private Domestic Wastewater Systems
- TMDL Efforts
  - Russian River
  - Laguna de Santa Rosa
- Early Implementation Efforts

Water Boards

Laguna de Santa Rosa Impairments

Comment Letter G_RRWPC
Attachment 7

Russian River Indicator Bacteria Impairments

Topics

- Water Quality Concerns & Potential Sources
- Current Core Regulatory Efforts
  - Publicly-Owned Treatment Works
  - Wineries, Food Processors, & Dairies
  - NPDES Storm Water
  - Private Domestic Wastewater Systems
- TMDL Efforts
  - Russian River
  - Laguna de Santa Rosa
- Early Implementation Efforts

Water Boards

Comment Letter G_RRWPC
Attachment 7

Potential Sources

- Domestic & Municipal
  - Publically Owned Treatment Works
  - Permitted, Non-sewered Systems (e.g., septic, mound systems)
  - Unpermitted, Non-sewered Facilities & Parcels
- Industrial Discharges
- Storm Water Runoff
- Spills
- Homeless
- Migrant Worker Camps
- Recreation
- Dairies
- Grazing
- Horses & Other Animal Rearing Activities
- Wildlife

Water Boards

Municipal Wastewater Treatment Facilities
Control of Pollutants

- Biochemical Oxygen Demand
  - Aeration and other oxidative processes
- Total Suspended Solids
- Bacteria
  - Disinfection – Chlorination or Ultraviolet Light
- Nutrients
  - Monitor
  - Evaluate reasonable potential
  - Establish interim and/or final effluent limitations, if needed
  - Evaluate compliance methods
    - Source control and treatment (nitrification/denitrification)
  - Establish schedule to comply with final effluent limitations

Water Boards

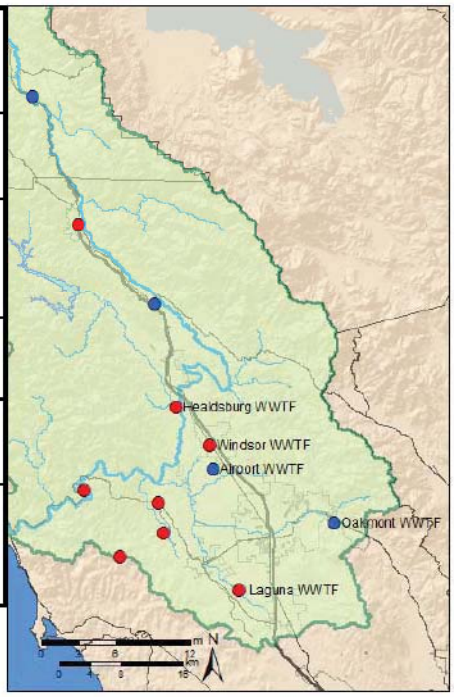
Comment Letter G_RRWPC
Attachment 7

Municipal Wastewater Treatment Facilities

- 14 POTWs
  - 5 WDRs only
  - 9 NPDES/WDRs
- All enrolled in statewide WDRs for collection systems
- WDR Facilities
  - Land discharge only
- NPDES Facilities
  - Five year permit term
  - Seasonal discharges to surface waters (October 1 – May 14)
  - One percent of receiving water flow

Southeastern Wastewater Treatment Facilities

Facility	ADWF/ Treatment	Disposal Method
Healdsburg*	1.4 mgd Tertiary - N,D	Basalt Pond All year
Windsor	2.25 mgd Tertiary - N,D	Mark West Cr Store/reclaim Geysers
Airport	0.9 mgd Second/Tertiary	Store/reclaim
Oakmont	0.065 mgd Secondary	Store/reclaim Laguna Plant
Santa Rosa	21.3 mgd Tertiary - N,D	Laguna Store/reclaim Geysers



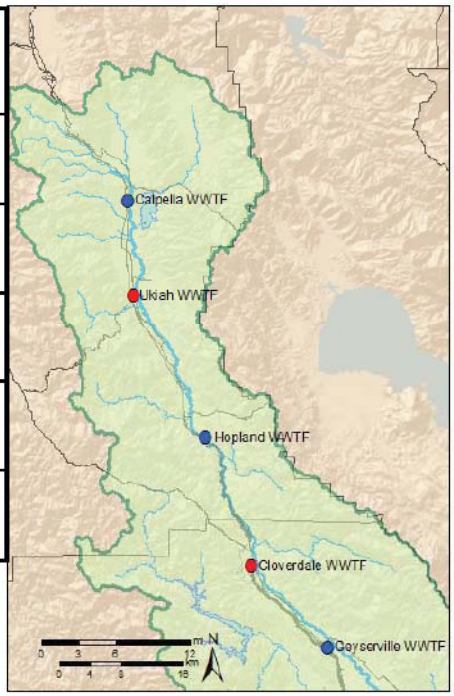
*CDO for compliance with Basin Plan seasonal discharge prohibition

N = nitrification D = denitrification

Comment Letter G_RRWPC
Attachment 7

Northern Wastewater Treatment Facilities

Facility	ADWF/ Treatment	Disposal Method
Calpella	0.04 mgd Secondary	Perc pond All year
Ukiah*	3.01 mgd Second/Tertiary	Perc ponds River
Hopland**	0.09 mgd Secondary	Perc pond All year
Cloverdale*	1.0 mgd Secondary	Perc ponds All year
Geyserville	0.092 mgd Secondary	Perc pond All year



*Permit requires evaluation of compliance with Basin Plan seasonal discharge prohibition

*ACL requires compliance with WDRs

ADWF = Average dry weather design flow

Topics

- Water Quality Concerns & Potential Sources
- Current Core Regulatory Efforts
  - Publicly-Owned Treatment Works
  - Wineries, Food Processors, & Dairies
  - NPDES Storm Water
  - Private Domestic Wastewater Systems
- TMDL Efforts
  - Russian River
  - Laguna de Santa Rosa
- Early Implementation Efforts

Water Boards

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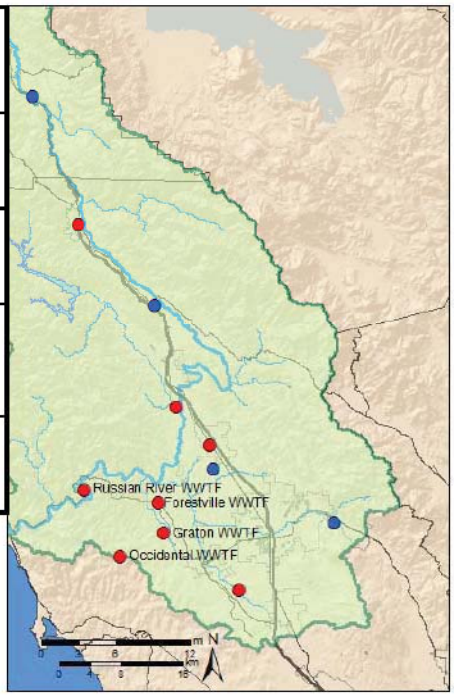
Attachment 7

Southwestern Wastewater Treatment Facilities

Facility	ADWF/ Treatment	Disposal Methods
Forestville	0.13 mgd Tertiary	Jones Cr Store/reclaim
Graton*	0.14 mgd Secondary*	Atascadero Cr Store/reclaim
Russian River CSD	0.71 mgd Tertiary	Russian River Reclaim/land discharge
Occidental**	0.02 mgd Secondary	Dutch Bill Cr Ag irrigation

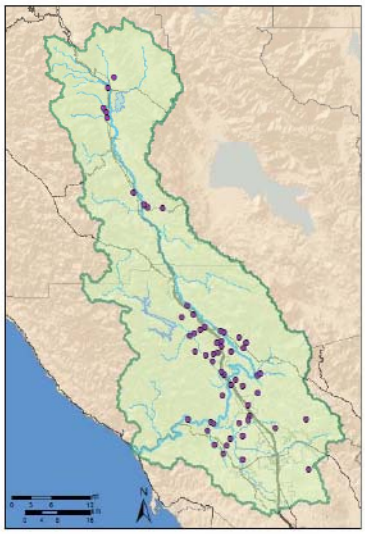


*CDO requires upgrade to tertiary to comply with Basin Plan

**CDO requires compliance with Basin Plan (upgrade to tertiary or zero discharge)

Wineries

- 55 Permitted Facilities
- Regulated Under General Permit
- Land Application Only
- No Nutrient or Bacterial Limits or Monitoring



Water Boards

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Russian River Watershed

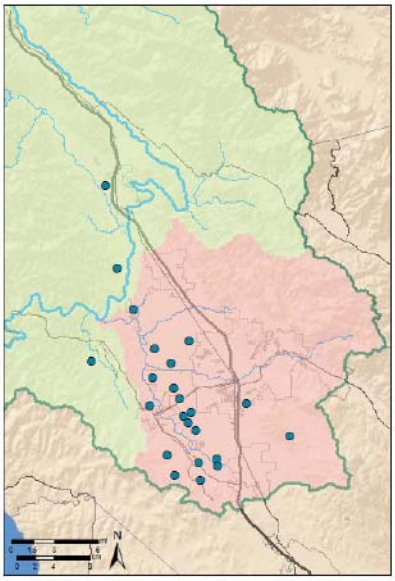
Food Processors and Producers

- Waste Streams
  - Liquid
  - Solid
- Waste Characteristics
  - Biochemical Oxygen Demand (BOD)
  - Total Suspended Solids (TSS)
  - Nitrogen
  - Phosphorous
  - Bacteria

Water Boards

Dairies

- 23 Facilities
- New Dairy Program
- Nutrient Management
- Monitoring



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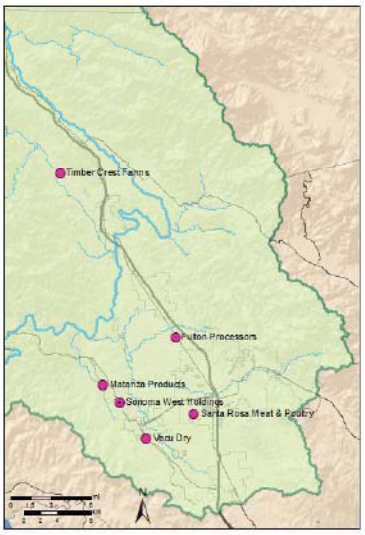
Food Processors

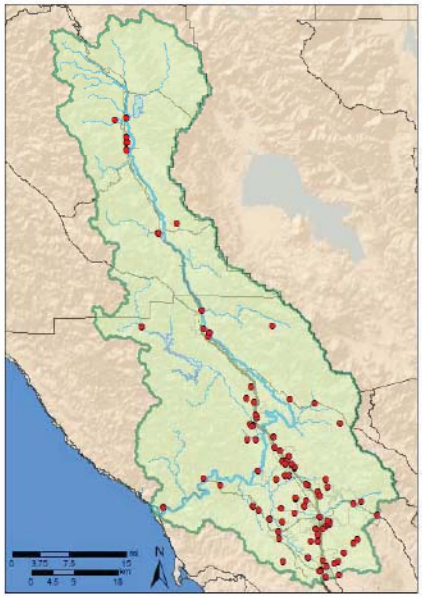
- 6 Facilities in Sonoma
- Regulated Under Individual Permits
- Primarily Land Application
- No Nutrient or Bacterial Limits or Monitoring



Water Boards

Construction Storm Water

- New permit adopted in September 2009
- Effective July 2010
- New electronic application
  - Potentially significant number of non-filers
- Approx. 90 permitted sites in RR watershed
- Projects under 1 acre do not need permit coverage, but must comply with Basin Plan
  - No RB oversight program



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Topics

- Water Quality Concerns & Potential Sources
- Current Core Regulatory Efforts
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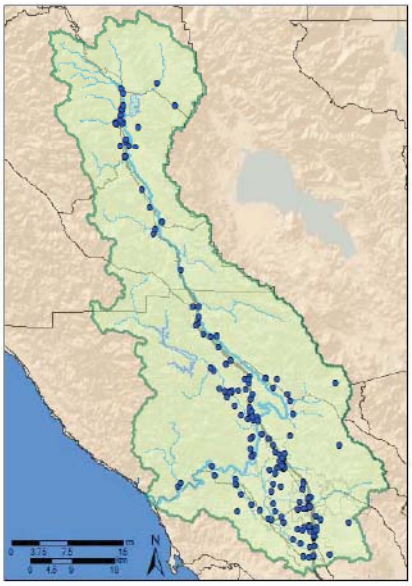
  - Russian River
  - Laguna de Santa Rosa
- Early Implementation Efforts

Water Boards

Industrial Storm Water

- Not covered:
  - Kennels, commercial stables, boarding and doggy day-care, vets
  - Nurseries, landscaping stores, winery pomace and some composting operations, farm supply, and home improvement stores



Water Boards

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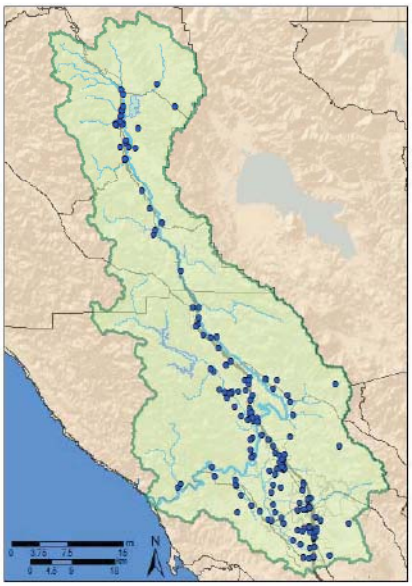
Industrial Storm Water

- Permit adopted in 1997, new permit in development
- 177 permitted sites in RR watershed
- Example industries covered
  - Pulp and wood mills
  - Asphalt and ready mix concrete plants
  - Mining ops, wrecking yards, airports and landfills
  - Wastewater treatment plants



Water Boards

Municipal Storm Water

- Phase 2s have less developed program
- Most of RR watershed not covered
  - Men county adopted county-wide storm water ordinance
  - Son county adopted county-wide grading ordinance
- Future of program
  - Focus on BMPs target pollutants/activities that contribute to impairments
  - Aid in TMDL implementation

Water Boards

Comment Letter G_RRWPC
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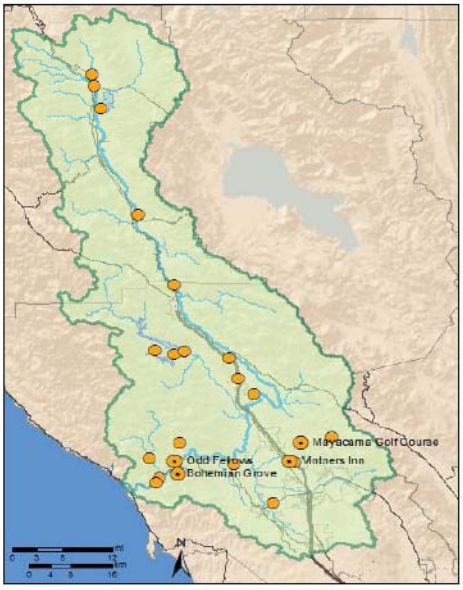
Municipal Storm Water

- Control pollutant discharge from storm drains
- 9 permitted municipalities in RR watershed
  - Phase 1: Santa Rosa, part of Sonoma County
  - Phase 2: Rohnert Park, Cotati, Sebastopol, Windsor, Healdsburg, Ukiah, part of Mendocino County

Water Boards

Private Domestic Wastewater Treatment Facilities

- 23 Domestic Systems
- No NPDES Discharges
- Waste Discharges to Land
  - Septic Systems
  - Pond Treatment/Storage Systems
- Individual and General Waste Discharge Requirements



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Topics

- Water Quality Concerns & Potential Sources
- Current Core Regulatory Efforts
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- Early Implementation Efforts

Water Boards

Private Domestic Wastewater Treatment Facilities

Unregulated Facilities

- Campgrounds and RV Parks
- Mobilehome Parks
- Summer Camps
- Conference Facilities
- Schools
- Hotels and Lodges
- Restaurants
- Food Production/Processing Facilities

Water Boards

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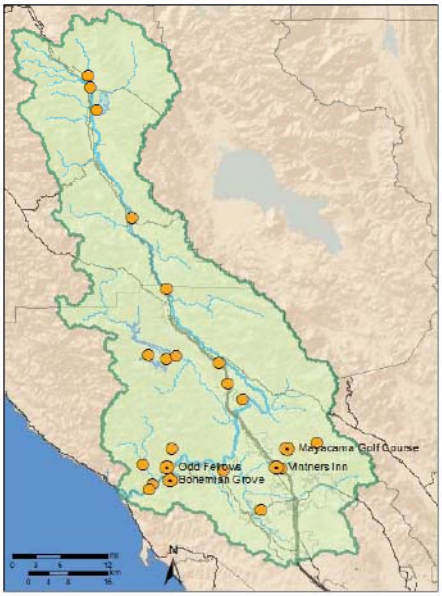
Private Domestic Wastewater Treatment Facilities

- **Large Systems (> 20,000 gpd)**
  - Individual WDRs
  - Bohemian Grove, Vintner's Inn, Mayacamas Golf Course, Luther Burbank Center
- **Small to Medium-Sized Systems (1,500- 20,000 gpd)**
  - Individual and General WDRs
  - Mobilehome Parks, Campgrounds, Salvation Army, Odd Fellows, Farm Worker Housing



Private Domestic Wastewater Treatment Facilities

- Watershed-wide Parcel Analysis using GIS
  - Fill data gaps
  - Identify potential problem areas
- Local Coordination
  - Sonoma County Permit and Resource Management Department
  - Sonoma County Department of Health Services
  - Sonoma County Assessor's Office
  - Mendocino County Division of Environmental Health
  - Municipalities

Water Boards

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Private Domestic Wastewater Treatment Facilities

- Residential Systems (<1,500 gpd)
  - Regulated by County under Basin Plan Policy
  - Single and Multiple Family residences
  - Vacation Rentals
  - Small Commercial Facilities

Water Boards

Topics

- Water Quality Concerns & Potential Sources
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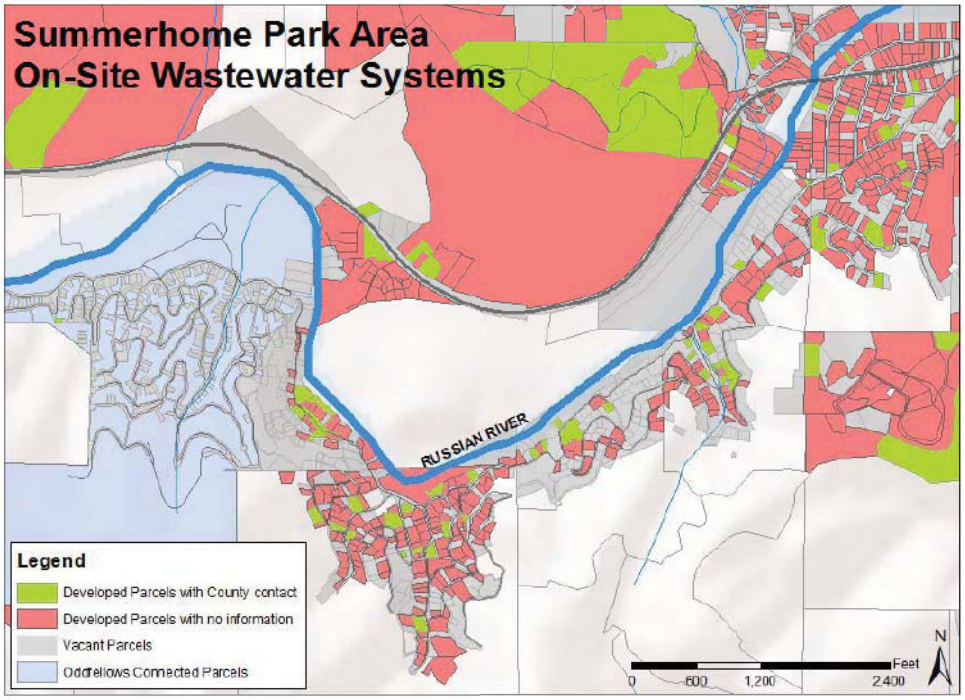

Russian River Pathogen TMDL
UC Davis Pilot Study

Conducted by Aquatic Ecosystems Analysis Laboratory

Preliminary Findings for Indicator Bacteria:

- Thresholds exceeded throughout study area
- Lower levels at semi-rural, less developed sites than at urban sites
- Positive correlation with rainfall
- Human-source bacteria present in significant concentrations in agricultural and urban areas

Water Boards

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Russian River Indicator Bacteria Impairments

Russian River Pathogen TMDL
UC Davis Pilot Study

Monitoring Recommendations:

- Expand analyses to include *Bacteroides* and Stable Isotope Analysis
- Sample at least weekly during the dry season
- Sample on weekends, including holidays
- Sample a range of flows
- Sample in the tributaries
- Collect at least 3 samples at each site

Water Boards

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Russian River Pathogen TMDL
UC Davis Pilot Study

California Regional Water Quality Control Board
North Coast Region

Russian River Pathogen Monitoring Pilot Project
Report Summary

The North Coast Regional Water Quality Control Board (Regional Water Board) is in the process of studying pathogen contamination in the Russian River watershed as part of an effort to protect human health and water quality, as required by the federal Clean Water Act.

A comprehensive monitoring program, scheduled to begin in Spring 2011, is needed to identify sources of pollution and inform recommendations for corrective measures.

As part of the planning process, the Regional Water Board commissioned a pilot study of pathogen contamination in the watershed. Over six months from December 2008 through May 2009, the Aquatic Ecosystems Analysis Laboratory at the University of California, Davis conducted the study, which is summarized in this fact sheet.

The full "Russian River Pathogen TMDL Monitoring Pilot Project: A Summary Report to the North Coast Regional Water Quality Control Board" report is available on the Regional Water Board's webpage at http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/russian_river/.

Key Findings from the Report

- Future pathogen monitoring should include greater sampling frequency, more monitoring locations, and a greater number of samples collected from each site
- *Bacteroides* and stable isotope analysis are recommended for monitoring human-source fecal contamination, in addition to indicator bacteria
- Indicator bacteria species were present in amounts exceeding water quality standards throughout the study area
- Bacteria levels were lower at semi-rural, relatively less developed sites than in urban locations
- Bacteria concentrations were correlated with rainfall: when rainfall increased, pollution increased
- When river flows were low: human-source bacteria were present in significant concentrations in both agricultural and urban areas

Background: Russian River Pathogen Impairments

Levels of pathogenic indicator bacteria in several segments of the Russian River and its tributaries are high enough that these reaches are listed as "impaired" under Section 303(d) of the federal Clean Water Act. Impairment means that these waters are at times unsafe for swimming, wading, and other forms of water contact recreation. The federal Clean Water Act requires the Regional Water Board to identify sources of the contamination and adopt a cleanup plan that, when implemented, will make these waters safe for people to use for recreation.

Previous studies have identified bacteria contamination in the following river and stream reaches:

- Russian River from Pile Creek in Guerneville to Dutch Bill Creek in Moon Rio
- Russian River around Healdsburg Memorial Beach, from the railroad bridge to the Highway 101 bridge
- An unnamed creek near Fitch Mountain in Healdsburg
- Green Valley Creek and its tributaries
- The Laguna de Santa Rosa and its tributaries, including Santa Rosa Creek and its tributaries

North Coast Regional Water Quality Control Board — page 1 — January 2011

Summary Report available at:

http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/russian_river/

Water Boards

Russian River Pathogen TMDL Monitoring Plan

Monitoring Analytes

- *E. coli Bacteria*
  - **Department of Health regulatory criteria**
- *Enterococcus Bacteria*
  - **Department of Health regulatory criteria**
- *Bacteroides Bacteria*
  - **specific to the host animal (human vs. bovine)**
- Phylochip®
  - **Quantifies over 50,000 different bacteria** *including* **human pathogens**
- Stable Isotope Analysis
  - **Identifies the source of the surface water**

Water Boards

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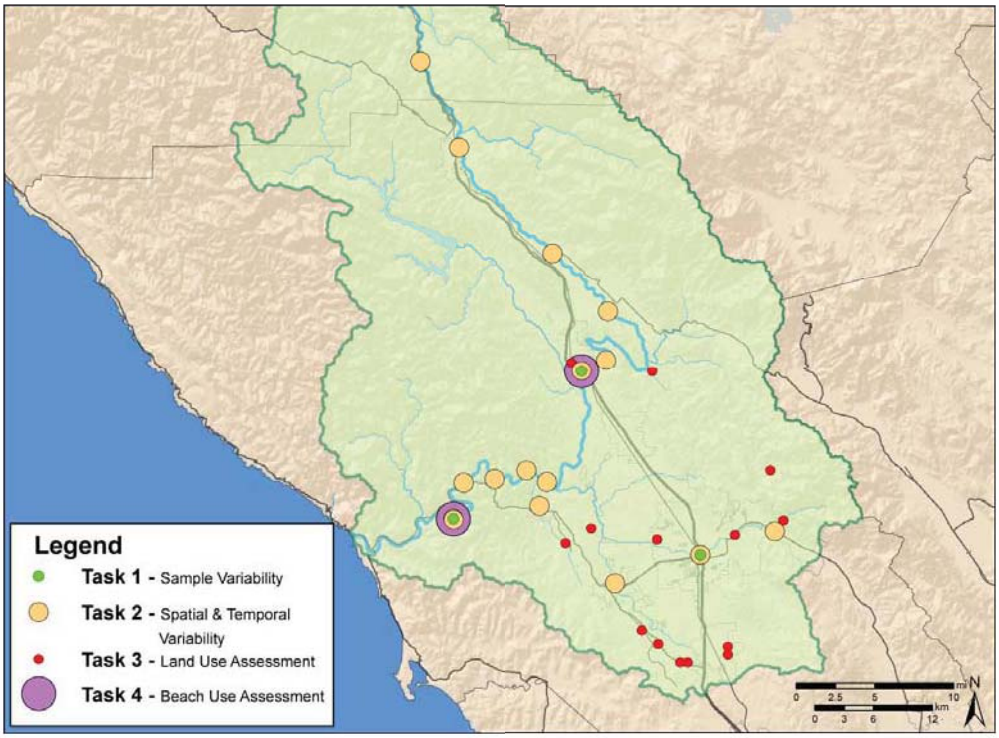
Russian River Pathogen TMDL Monitoring Plan

Management Questions

1. Are Basin Plan Water Quality Objectives being met?
2. What is the variability of indicator bacteria?
3. What are the most significant sources?
4. What are the natural background levels?
5. Do beach areas pose a higher risk to REC-1 than non-beach reaches?

Water Boards

Pathogen TMDL Monitoring Locations



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Russian River Pathogen TMDL Monitoring Plan

Monitoring Tasks

Task 1: Sampling Variability
- Laboratory, Site and Sample Replication

Task 2: Spatial and Temporal Variability
- Wet and Dry Period Monitoring at 18 Locations

Task 3: Land Use Assessment
- Wet and Dry Period Monitoring Runoff
- 5 Land Use Categories:
  Forest Land, Brush & Scrubland, Agriculture,
  High Density Residential, Low Density Residential Areas.

Task 4: Beach Use Assessment
- Week-long Intensive Monitoring at 2 Listed Beaches:
  Monte Rio Beach & Healdsburg Memorial Beach.

Water Boards

Russian River Pathogen TMDL Schedule

Activity	Timeframe
Regional Board Lab Certification	April 2011
Sample collection	May – Winter 2012
Monitoring Plan Report	June 2012
Draft TMDL	Early 2013
Regional Board Hearing	2013

Water Boards

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Russian River Pathogen TMDL Monitoring Plan

Quality Assurance Project Plan will be available at:

http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/russian_river/

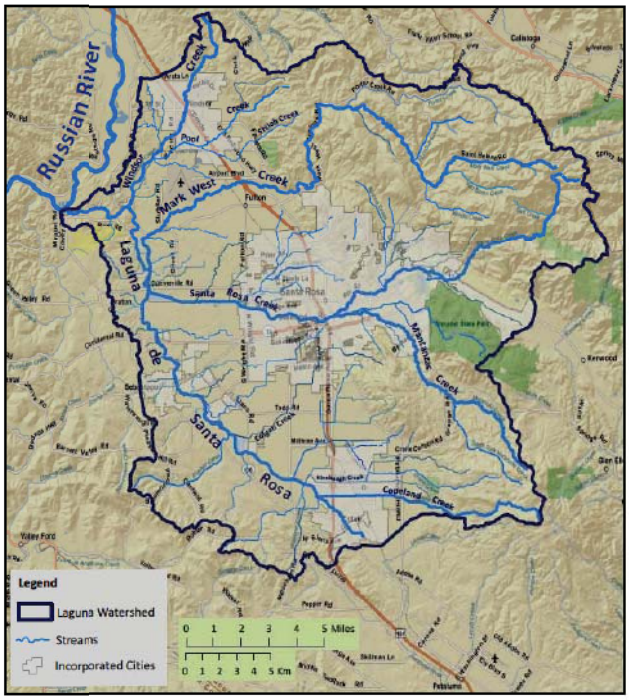
Water Boards

Laguna de Santa Rosa TMDLs

Includes

Waterbodies:
Laguna de Santa Rosa
Windsor Creek
Mark West Creek
Santa Rosa Creek
Blucher Creek
Copeland Creek

Impairments:
Nitrogen
Phosphorus
Dissolved Oxygen
Temperature
Sediment



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Topics

- Water Quality Concerns & Potential Sources
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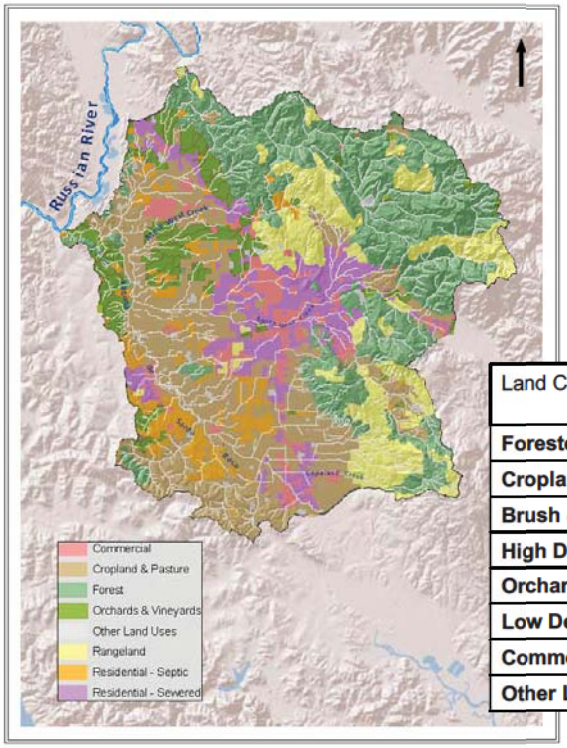
  - Private Domestic Wastewater Systems
- TMDL Efforts
  - Russian River
  - Laguna de Santa Rosa
- Early Implementation Efforts

Water Boards



Current Land Cover Areas

Land Cover Category	Wet Year Acreage	Percent of Watershed
Forested Lands	**48,315**	**30%**
Cropland & Pasture	**44,458**	**28%**
Brush & Scrublands	**21,767**	**13%**
High Density Residential	**15,348**	**9%**
Orchards & Vineyards	**12,825**	**8%**
Low Density Residential	**9,857**	**6%**
Commercial Areas	**8,577**	**5%**
Other Land Covers	**1,461**	**1%**

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Attachment 7

Laguna TMDLs
Nutrient Source Analysis

Land Use Categories Sampled in 2009:
Based on 2006 USGS National Land Cover Data

- Residential – High Density, Sewered
- Residential – Low density, Non-sewered
- Commercial and Services
- Cropland and Pasture
- Vineyards, Orchards, and Horticultural Areas
- Brush and Scrubland
- Forested Lands

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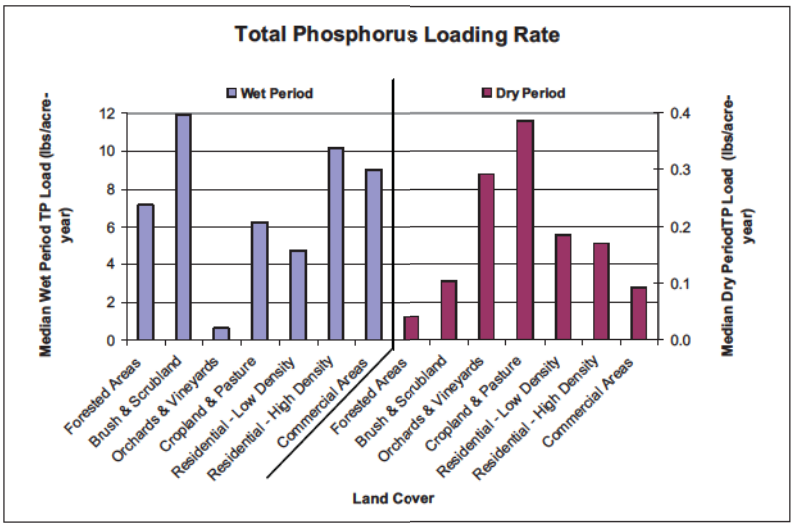
Laguna TMDLs
Nutrient Source Analysis



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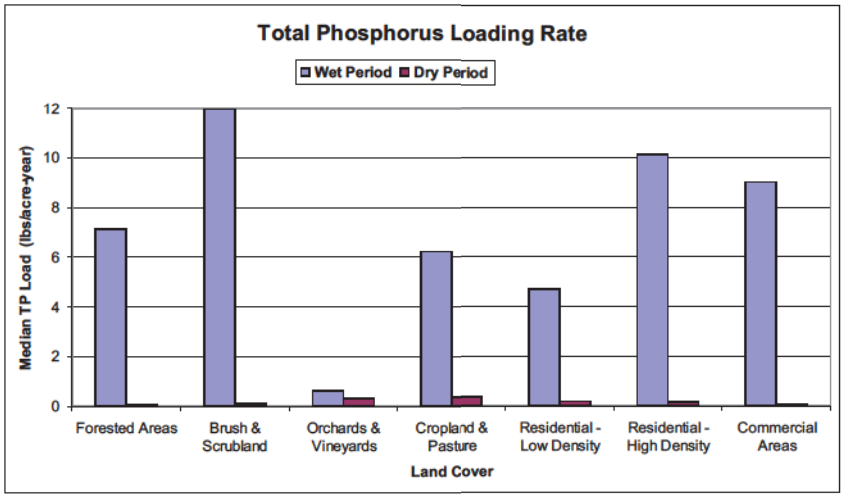
Laguna TMDLs
Nutrient Source Analysis



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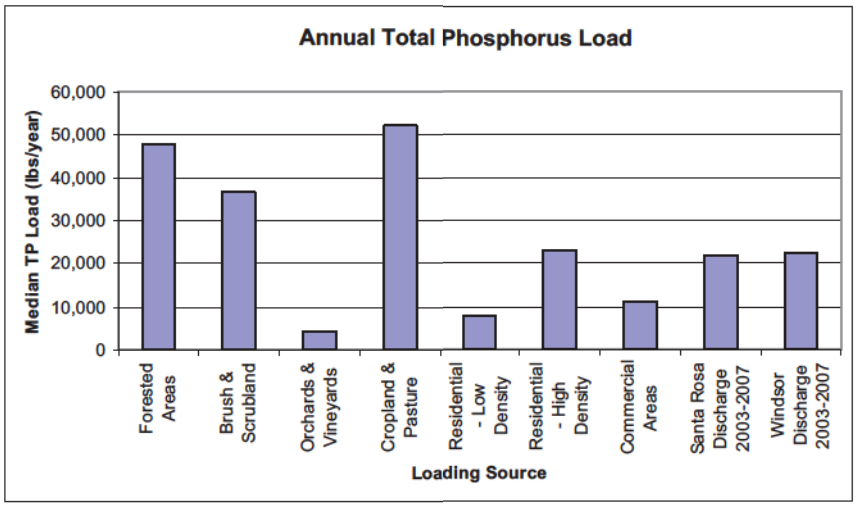
Laguna TMDLs
Nutrient Source Analysis



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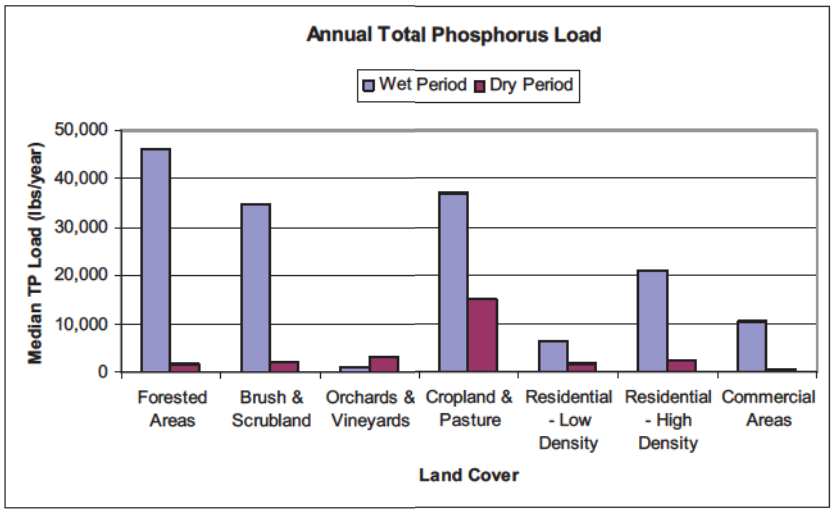
Nutrient Source Analysis



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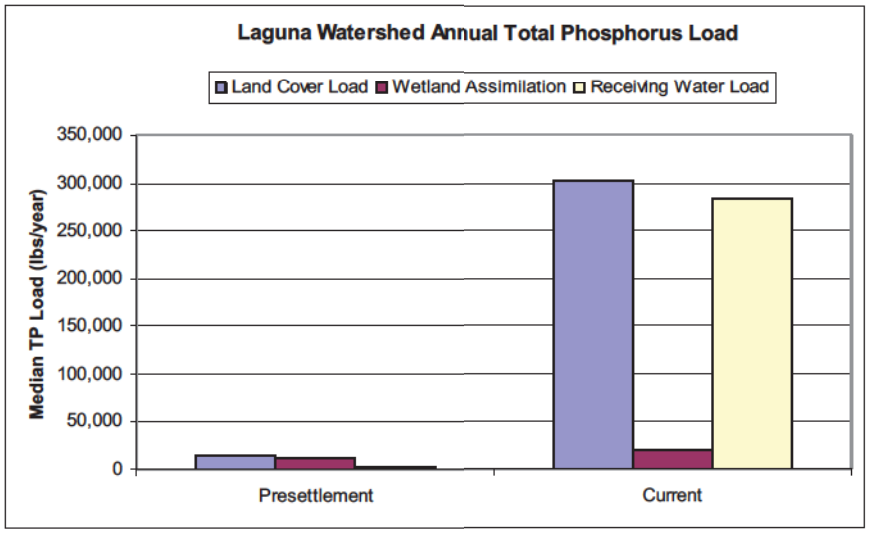
Laguna TMDLs
Nutrient Source Analysis



Water Boards

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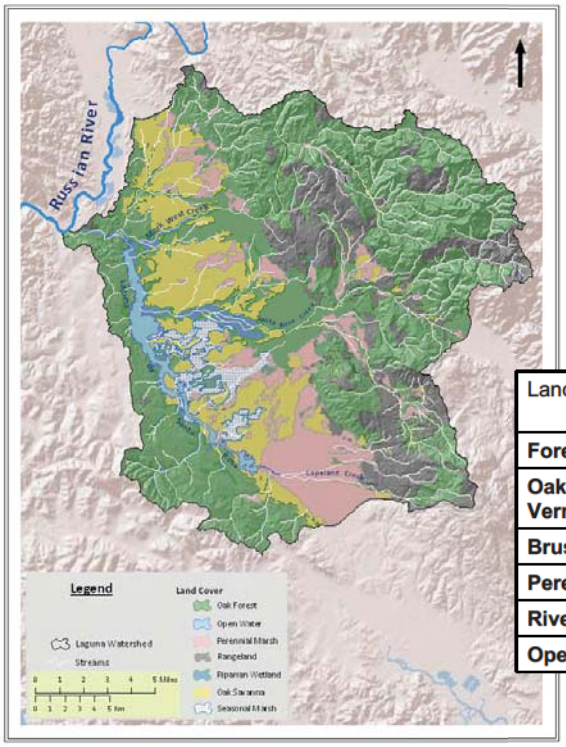

Pre-settlement Land Cover Areas

Land Cover Category	Wet Year Acreage	Percent of Watershed
Forested Lands	**84,515**	**52%**
Oak Savanna & Vernal Pools	**28,823**	**18%**
Brush & Scrublands	**24,292**	**15%**
Perennial Wetlands	**16,969**	**10%**
Riverine Wetlands	**5,145**	**3%**
Open Water	**3,045**	**2%**

Laguna TMDLs
Next Steps

Nutrients & Dissolved Oxygen
- Linkage Analysis
- Target Conditions
- Loads & Load Allocations

Sediment

Temperature

Implementation

Water Boards

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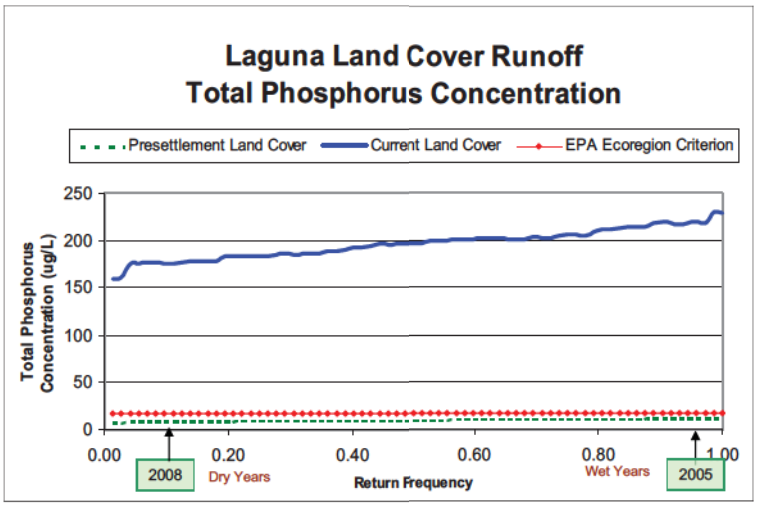
Attachment 7

Laguna TMDLs
Nutrient Source Analysis



Water Boards

Laguna TMDLs Schedule

Activity	Timeframe
Stakeholder Involvement	Ongoing
Nutrient & Dissolved Oxygen Analyses	Summer 2011
Sediment & Temperature Analyses	Fall 2011
Implementation Plan Development	Fall 2011 to Early 2012
Public Review	Spring 2012
Regional Board Hearing	Fall 2012

Water Boards

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Stakeholder Involvement

- Critical for success
- Stakeholder Plan
  - http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/laguna_de_santa_rosa
- Goals
  - Communicate with and inform stakeholders
  - Solicit and receive useful input
  - Community support

Water Boards

Early Implementation Efforts

- Continue regulatory programs
  - Improve municipal storm water program
  - Explore septic system coverage
  - Continue facility inspections
- Portable toilets at recreation beaches
- Engage homeless advocates/community
- Focus on migrant worker camps

Water Boards

Comment Letter G_RRWPC
Attachment 7

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- Early Implementation Efforts

Water Boards

Contact Information

Webpage:

http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/

Mailing List:

http://www.waterboards.ca.gov/resources/email_subscriptions/reg1_subscribe.shtml

Phone:

(707) 576-2220

E-mail:

Rebecca Fitzgerald, TMDL Unit Lead	rfitzgerald@waterboards.ca.gov
John Short, Core Regulatory Unit Lead	jshort@waterboards.ca.gov
Charles Reed, Russian River TMDL Project Manager	creed@waterboards.ca.gov
Steve Butkus, Laguna and Russian Technical Specialist	sbutkus@waterboards.ca.gov

Russian River Watershed Protection Committee, Brenda Adelman, February 14, 2011

G_RRWPC-1 The revised Notice of Preparation scoping comments, submitted as Attachment 1, are incorporated into the record. Individual responses to Attachment 1 are provided in Responses G_RRWPC-56 through G_RRWPC-62.

G_RRWPC-2 CEQA provides for professional judgment. The level of impact is based on a reasonable assumption predicated upon fact, or expert opinion supported by fact. If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant (CEQA 15064(g)).

G_RRWPC-3 The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion, or the change from "natural" conditions referenced in the Biological Opinion to current conditions. As such, the Draft EIR is not required to retroactively characterize the historic flora and fauna that may have been affected by past unrelated actions; rather the Draft EIR considers the potential effects of the proposed project on the existing physical environment. For a discussion of the relationship of the Estuary Management Project to the flows under the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR also cumulatively analyzes, in Draft EIR Chapter 5.0 Cumulative Analysis, the impacts of reducing minimum instream flows proposed by the Biological Opinion under the Fish Habitat Flows and Water Rights Project in conjunction with impacts associated with the Estuary Management Project.

G_RRWPC-4 The Draft EIR for the Estuary Management Project does not state that flows have been as low as 25 cfs in the lower Russian River. For a discussion of the relevance of flow data to the Estuary Management Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**. For a discussion of the Draft EIR analysis of water quality parameters refer to Draft EIR Section 4.3, Water Quality, specifically Impacts 4.3.2 (temperature) and 4.3.3 (bacteria and nutrients). For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_RRWPC-5 Please refer to response to comment G_RRWPC-3. The analysis in this Draft EIR is based on potential changes from existing baseline conditions, as required by CEQA, not on changes from a pre-dam "natural" condition. As presented in **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**, the Russian River Biological Opinion concludes

that Water Agency operations have potential to jeopardize the continued existence of federally listed steelhead and coho salmon and their critical habitat. The Russian River Biological Opinion includes a requirement to modify practices to avoid jeopardizing these species and their critical habitat and to enhance rearing habitat for juvenile salmonids within the Estuary.

G_RRWPC-6 Please refer to response to comment G_RRWPC-3. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR is not required to provide a historical account of past degradation over the last 100 years. It is recognized that past activities, including loss of riparian habitat, gravel mining, sedimentation, timber harvest, and agriculture have influenced river water quality, and these factors are captured as part of the environmental baseline used for analysis, as presented in Draft EIR Chapter 3.0, Project Background and Environmental Setting.

G_RRWPC-7 Please refer to responses to comments G-RRWPC-3 and -6. Estuary management during the Lagoon Management Period may be subject to a variety of weather patterns and subsequent flow conditions. The Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions, as noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (Figure 3-1).

G_RRWPC-8 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-9 Impact 4.5.2, Habitat Quality, in Draft EIR Section 4.5, Fisheries, included an analysis of the potential effect of Estuary Management Project on outmigrating Chinook and coho smolts. Please refer to discussion beginning on page 4.5-23 of the Draft EIR. It should be noted that a closure event and formation of a barrier beach in May is not caused or proposed by the Project, which would not affect the occurrence or timing of natural closures. Barrier construction to maintain a closed mouth is not proposed as part of the project, As discussed in Draft EIR Chapter 2.0, Project Description, the intent of the project is to modify previous management during the Lagoon Management Period, and create an outlet channel following a natural beach closure such that outflow occurs, but tidal exchange is minimized, to improve rearing habitat for juvenile salmonids.

G_RRWPC-10 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master**

Responses. Per the commenter's request, the flow data recorded at Hacienda Bridge that was considered in the Draft EIR is provided in **Final EIR Appendix 2**, which shows historical flow data at Hacienda Bridge, Guerneville, relative to mouth closure dates.

G_RRWPC-11 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR analyzes the potential water quality effects of the proposed Estuary Management Project. Water quality impacts in the maximum backwater area (the greatest geographic area in which any impacts are projected to occur) are described in Draft EIR Section 4.3, Water Quality. For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Additionally, impacts associated with Fish Habitat Flows and Water Rights Project, are considered in the cumulative analysis in Draft EIR Chapter 5.0, Cumulative Analysis.

G_RRWPC-12 Historical photos provided as an attachment to the comment letter are incorporated into the record.

G_RRWPC-13 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion, or the effects of flow on summer dams, which are outside the Estuary Study Area and maximum backwater area.

G_RRWPC-14 Draft EIR Chapter 2.0, Project Description, includes information on the timing of closures and subsequent natural and artificial breaching events during the Lagoon Management Period. As noted in **Master Response 2.1, Relationship to Other Biological Opinion Elements**, the Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions. As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (page 3-3), River flows typically decline rapidly over the five month lagoon management period. Flows in May averaged 767 cfs for the years 1939 to 2009, and averaged 178 cfs in September for the same time period. Because of decline in river flow during the lagoon management period, the primary factors in barrier beach formation are wave activity and tidal exchange, with river outflow being a secondary factor. Average monthly wave energy changes with the seasons; wave energy is greatest in winter, reduces over spring, and is minimal from July to September. However, late spring storms, early fall storms and Southern Hemisphere storms can occasionally produce waves

exceeding 10 feet in the vicinity of the river mouth during the lagoon management period. Swell waves with periods longer than 10 seconds from either the northwest or south are often the cause of closure during the management period. Large wave events are particularly likely to cause closure when they coincide with the reduced tidal exchange that occurs approximately every two weeks during neap tides. As such, the timing of closures within the lagoon management period will vary, as noted by commentor.

G_RRWPC-15 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-16 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Please refer to **Final EIR Appendix 2**, which shows historical flow data at Hacienda Bridge, Guerneville, relative to mouth closure dates.

G_RRWPC-17 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Please refer to **Final EIR Appendix 2**, which shows historical flow data at Hacienda relative to mouth closure dates.

G_RRWPC-18 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**. With respect to validity and availability of water quality data considered in the Draft EIR, please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**.

G_RRWPC-19 It is impossible to predict with certainty the future occurrence of barrier beach closures, as closure is dependent upon several factors. As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (page 3-3) barrier beach formation and closure of the river mouth is affected by wave activity from the Pacific Ocean, with river flow being a secondary factor. The Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions. As discussed on page 5-11 of the

Draft EIR, changes in Decision 1610 minimum instream flows could increase the number of barrier beach closures in a given year, depending upon the hydrologic year type and wave conditions during summer months. As clarification, the Draft EIR statement referenced by the commentor relates to the number of barrier beach closures in a given year.

G_RRWPC-20 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions, as noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (Figure 3-1).

G_RRWPC-21 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-22 Comment requests clarification of whether 71 cfs was measured during a closure event. Draft EIR page 2-16 states:

> "Review of flow data for the 115 **closure events** occurring between 1996 and 2009 indicated a median flow at the USGS Guerneville Gauge for these events is 250 cubic feet per second (cfs), with a minimum flow of 71 cfs and a maximum flow of 1,120 cfs."

G_RRWPC-23 2009 was a Temporary Urgency Change year due to a dry spring season. The 71 cfs is within the minimum flow conditions for Hacienda in a dry year and within the order issued by SWRCB to reduce minimum instream flows, as well as within the Russian River Biological Opinion flow change requirements. The 2009 Photo Report included with the comment letter is incorporated into the record.

G_RRWPC-24 This comment does not indicate any deficiency or question about the adequacy of the analysis or mitigation measures contained in the Draft EIR. The TUCPs are not proposed as part of the Estuary Management Project. The TUCPs result from a separate requirement of the Russian River Biological Opinion and have been found by the SWRCB to be exempt from CEQA. The potential for the Estuary Management Project to contribute cumulatively to impacts related to TUCPs are considered in a cumulative analysis (Draft EIR, Chapter 5.0, Cumulative Analysis) and includes information on the CEQA analysis for the TUCP.

G_RRWPC-25 The comment is incorrect in the assertion that the NMFS scoping letter, dated June 22, 2010 argues that the Estuary Management Project should consider flow changes in the same EIR. Instead, the NMFS scoping letter states:

> "The Russian River BO directs SCWA to pursue Temporary Urgency Changes (TUC) to D-1610 to reduce summer inflow prior to a final change in D-1610 that will be supported by a separate EIR and water rights regulatory process, which we [NMFS] anticipate will be completed sometime between 2014 and 2016."

The Russian River Biological Opinion and NMFS' scoping letter recognize that flow changes would be analyzed in a separate CEQA process. Both changes to flow under Decision 1610 and the TUCs are included in the cumulative analysis in Draft EIR Chapter 5.0. This analysis considers the potential impacts of the Estuary Management Project, in conjunction with the anticipated effects of reducing minimum instream flows. The TUCPs result from a separate requirement of the Biological Opinion and have been found by the SWRCB to be exempt from CEQA.

G_RRWPC-26 As discussed in Draft EIR Chapter 1.0, Introduction, the Water Agency has historically provided management of Estuary water levels through artificial breaching, and will continue to do so. The Water Agency requested and received extensions of existing permits to cover Estuary management activities in 2010 and 2011, including lagoon management actions. The Water Agency is currently in the process of acquiring permits for the Estuary Management Project. The lagoon outlet channel was implemented in July 2010 under the existing permits. The Water Agency intends to implement the Estuary Management Project in 2011 in order to comply with the Russian River Biological Opinion.

G_RRWPC-27 No environmental review under NEPA is required because the project is not proposed, and would not be implemented by, a federal Lead Agency. The Water Agency is the Lead Agency under CEQA. Federal agencies, including USACE, will complete their independent review of the project, and any required NEPA process, as appropriate.

G_RRWPC-28 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.** Please also refer to response to comment G_RRWPC-19, above.

G_RRWPC-29 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion of water quality impacts and

Draft EIR analysis, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. The Draft EIR for the Estuary Management Project includes an analysis of potential secondary effects to fisheries resulting from water quality changes in Impact 4.5.1 in Draft EIR Section 4.5, Fisheries, beginning on page 4.5-19.

G_RRWPC-30 As described in Draft EIR page 4.2-2, Table 4.2-1 is included to provide context information about the existing hydrologic regime regarding flows year-round. In combination with Draft EIR Figure 3-1, this shows what range of flows may be expected during the Lagoon Management Period. Please refer to **Final EIR Appendix 2**, which shows historical flow data at Hacienda relative to mouth closure dates.

G_RRWPC-31 Please refer to **Final EIR Appendix 2**, which shows historical flow data at Hacienda relative to mouth closure dates. Draft EIR Chapter 3.0, Project Background and Environmental Setting, Section 3.5, and Section 4.2, Hydrology and Flooding, for a discussion of water levels during closure events.

With respect to the flow values presented in the Draft EIR, the median flow data is presented, as opposed to the mean, as requested by the commenter, because median values are resistant to outliers, values that are numerically distant from the rest of the data. Both mean and median data are presented in **Final EIR Appendix 2**.

As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (page 3-3) barrier beach formation and closure of the river mouth is affected by wave activity from the Pacific Ocean, with river flow being a secondary factor. The Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions. The Russian River Biological Opinion content is not analyzed or disputed in this Draft EIR. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-32 For a discussion regarding the Estuary Management Project's potential contribution to nutrients, blue-green algae formation, and required water quality monitoring, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-33 This comment is not directed to the environmental analysis of Draft EIR for the Estuary Management Project; therefore no changes in the Final EIR are necessary. Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-34 Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses,** for a discussion of Section 303(d) List of Impaired Water Bodies and **Master Response 2.3, Project Feasibility**. As noted in these responses, the Estuary Management Project would be implemented using adaptive management. Potential future conditions identified by the commentor would be addressed as part of this process. It should be noted that the project's Adaptive Management Plan includes provisions for breaching in the event of flooding conditions, water quality conditions, or biological conditions warrant, after consultation with NMFS and CDFG.

G_RRWPC-35 Please refer to the discussion in **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for a discussion regarding *Ludwigia*.

G_RRWPC-36 The information regarding standards for nitrogen is provided in the absence of standards for estuaries, which are recognized by SWRCB and RWQCB as unique ecosystems that require specific water quality standards that are in the process of being developed. As such, these standards are only applicable to freshwater. Draft EIR Section 4.3, Water Quality, addresses nutrients and the potential for nuisance conditions that could impact beneficial uses.

G_RRWPC-37 Draft EIR Section 4.3, Water Quality, Impact 4.3.3 analyzes the potential effect of the Estuary Management Project on phosphorus levels in the Estuary during the lagoon management period. The Estuary Management Project would not contribute to new sources of phosphorus, nor would it lower flow. However, as described in the Draft EIR, there is potential for increased residence time of water moving through the Estuary, and potential for adverse increases in nutrient levels.

G_RRWPC-38 The Draft EIR for the Estuary Management Project considers the physical environmental effects associated with implementation of the proposed project. With respect to Russian River County Sanitation District, several wastewater treatment plant discharges occur within the watershed, and are considered part of existing water quality conditions. The facility is located outside of the Estuary Study Area and maximum backwater area, and as noted by the commentor, plant discharges would not occur during the lagoon management period. Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, regarding the potential for secondary biological effects associated with water quality.

G_RRWPC-39 Potential water quality impacts of the Estuary Management Project on fisheries are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2. Potential water quality impacts, including discussion of nutrient and pathogen levels are analyzed in Draft EIR Section 4.3, Water Quality, Impact 4.3.3.

G_RRWPC-40 The Water Agency does not currently sample water quality in Willow Creek, but rather a location just downstream of the Willow Creek confluence in the mainstem Russian River. Chlorophyll *a* conditions in Willow Creek are identified as a potential source of the higher chlorophyll *a* levels recorded in the mainstem sampling, described in Draft EIR Section 4.3, Water Quality.

The connection between nutrients and algal growth is discussed on page 4.3-5 of the Draft EIR at beginning of the nutrient discussion. Additional information related to algal growth is provided in **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

The letter from the Regional Water Quality Control Board, dated November 15, 2011, as referenced in the comment is directed toward the Fish Habitat Flows and Water Rights Project, not the Draft EIR for the Estuary Management Project. This comment is not directed to the Draft EIR for the Estuary Management Project; therefore no changes in the Final EIR are necessary. The Draft EIR does not include an analysis of potential violation of water quality objectives associated with the Fish Habitat Flows and Water Rights Project because this is a separate project. The Draft EIR Chapter 5.0, Cumulative Analysis, evaluates the potential cumulative impacts associated with the Estuary Management Project in combination with the Fish Flow project. For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Impact 4.3.3, in the Draft EIR, Section 4.3, Water Quality, identifies provisions for breaching in the event that flooding conditions, water quality conditions, or biological resource conditions warrant it, after consultation with NMFS and CDFG.

For an analysis of potential water quality impacts on fisheries, refer to Draft EIR Section 4.5, Fisheries, Impact 4.5.2.

G_RRWPC-41 Estuary water quality (temperature, salinity, dissolved oxygen) has been extensively monitored during the Lagoon Management Period since 2003 and is described in Draft EIR Chapter 3.0, Project Background and Environmental Setting. The comment cites a statement from Impact 4.3.2 regarding the potential for adverse impacts to salinity, dissolved oxygen, and temperature levels during the Lagoon Management Period. Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, and Draft EIR Chapter 3.0, Project Background and Environmental Setting, for the sources of water quality

information used to substantiate the setting and baseline conditions and discussion of existing water quality conditions in the Estuary.

G_RRWPC-42 Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses,** for a discussion related to the Estuary Management Project impact to bacteria levels. Please see page 4.3-22 of the Draft EIR Section 4.3, Water Quality, for a discussion of observed elevated bacteria levels related to freshwater inflow into the Estuary. The Draft EIR does not speculate on the causes of past increased bacteria levels. Please refer to Draft EIR Section 4.5, Fisheries, for analysis of anticipated habitat conditions associated with project implementation.

G_RRWPC-43 For a discussion regarding monitoring as mitigation under the adaptive management process, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Requirements**, in **Chapter 2, Master Responses**. Additional discussion related to the specific monitoring programs is provided in Draft EIR Chapter 3.0, Project Background and Environmental Setting, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion related to the Estuary Management Project impact to bacteria levels. Under CEQA, baseline conditions are considered the physical conditions at the time of the Notice of Preparation. The Draft EIR concludes that there is a potentially significant and unavoidable impact associated with bacteria levels in the Estuary during the lagoon management period. That Draft EIR is not intended to justify water quality impacts, rather, in accordance with CEQA, it analyzes and discloses the potential change from existing conditions. Potential impacts to fisheries are described in Draft EIR Section 4.5, Fisheries. Draft EIR Chapter 2.0, Project Description, describes the project purpose and objectives, including the Estuary water level management targets identified in the Russian River Biological Opinion.

G_RRWPC-44 Draft EIR Section 4.3, Water Quality reviews potential impacts to water quality associated with implementation of the Estuary Management Project. Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. The Estuary Management Project would not create or control sources of discharges of pollution or pollutant loads into the Russian River system.

G_RRWPC-45 For a discussion regarding water quality relative to pollutant levels and fish health of fish, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Effects of temperature on habitat are discussed in the Draft EIR Chapter 3.0, Project Background and Environmental Setting, on pages 3-23 and Section 4.5, Fisheries on page 4.5-22. With respect to potential increased predations, there is no substantial evidence to indicate that predation would be

significantly altered as a result of the project. The predator/prey relationship is naturally occurring and driven by population dynamics. This condition already occurs, and predation is an ongoing survival cycle. This relationship is not addressed by CEQA criteria; therefore, no mitigation is proposed as part of the Draft EIR. Refer also to response to comment G_NCRW-6.

G_RRWPC-46 For a discussion regarding water quality relative to temperature, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Additional information regarding current temperatures and variability in the Estuary is presented in Draft EIR Chapter 3.0, Project Background and Environmental Setting, and Section 4.3, Water Quality. Effects of temperature on habitat are discussed in the Draft EIR on pages 3-23 and 4.5-22.

G_RRWPC-47 Chinook salmon in the Russian River are considered "fall-run" and are adapted to avoid summer high temperatures (Draft EIR, page 4.5-11). The Russian River Biological Opinion concluded that estuary management is unlikely to jeopardize Chinook salmon or its critical habitat (NMFS, 2008); however, the Draft EIR considered Chinook salmon. Refer to Draft EIR Section 4.5, Fisheries, specifically Impact 4.5.2, Habitat Quality, for information regarding Chinook salmon adult and smolt migration timing, relationship to the Lagoon Management Period, and a discussion of the potential project impacts to habitat parameters, including water temperature, that could affect salmonids, including Chinook.

The following changes to the Draft EIR have been made to include a reference regarding the timing of Chinook salmon adult migration in the Draft EIR on page 4.5-23:

> "Chinook salmon can begin immigrating as early as August (a few individuals), but peak migration into the Estuary is typically in November and December (Chase et al. 2005; Chase et al. 2007), after the proposed management period."

The following references have been added to the Draft EIR, Section 4.5, Fisheries, reference section:

> "Chase, S., R. Benkert, D. Manning, and S. White. 2005. Sonoma County Water Agency's Mirable Rubber Dam/Wohler Pool Fish Sampling Program: Year 5 results 2004. December 31, 2005.
>
> Chase, S.D., D.J. Manning, D.G. Cook, and S.K. White. 2007. Historic accounts, recent abundance, and current distribution of threatened Chinook salmon in the Russian River, California. California Fish and Game 93(3): 130-148."

G_RRWPC-48 Dungeness crab are considered in the Draft EIR in Section 4.5, Fisheries. Impact 4.5.3 discloses the potential impact to Dungeness crab in the Estuary, including that the Estuary represents a minimal portion of the population and habitat compared to inshore coastal waters and the San Francisco Bay. The impact is less than significant.

G_RRWPC-49 The impact to Dungeness crab habitat would be less than significant as described in Impact 4.5.3 in the Draft EIR. The project would not affect and harvesting opportunities; therefore it does not require a permit under the Marine Life Protection Act from CDFG or other regulatory agency for this purpose.

G_RRWPC-50 Refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Requirements**, in **Chapter 2, Master Responses**. Impacts to interior river beach and localized Goat Rock State Beach access are disclosed in Draft EIR Section 4.7, Recreation, Impact 4.7.1. Impacts to interior beaches are mapped in Draft EIR Chapter 3.0, Project Background and Environmental Setting, Figures 3-4A through 3-4E and Section 4.4, Biological Resources, Figures 4.4-1 and 4.4-5. With respect to impacts to scenic areas, refer to Draft EIR Section 4.14, Aesthetics, for an analysis of temporary and short-term impacts to scenic resources at Goat Rock State Beach that would result from outlet channel creation and maintenance.

As part of the NOP public scoping and Draft EIR review process, notifications were mailed to stakeholders listed in the comment letter, including Casini Ranch operators, Burke's Canoe River Trips, Russian River Parks and Recreation District, Monte Rio Parks and Recreation District, Russian River Chamber of Commerce, Healdsburg Chamber of Commerce, Monte Rio Chamber of Commerce, Santa Rosa Chamber of Commerce, and Sonoma Valley Chamber of Commerce, among others, to solicit input on the scope of analysis presented in the NOP and comment on the Draft EIR.[1] Please refer to Draft EIR, **Appendix 1**, Notice of Preparation, Scoping Report and Scoping Comments, for the NOP and comments received during the scoping process. This Final EIR includes and responds to all comments received on the Draft EIR. Refer to Section 1.2 of this Final EIR for a summary of the Draft EIR public review process.

G_RRWPC-51 The Lagoon Management Period from May 15 to October 15 is consistent with the timing established in the Russian River Biological Opinion to target salmonid rearing periods. The minimum flows presented in Draft EIR Chapter 5.0, Cumulative Analysis, were not developed as part of the Estuary Management Project and are presented for informational purposes relative to the cumulative analysis of the proposed project impacts considered in conjunction with

[1] Direct mailing of hard copies of the NOP were mailed to these entities, with the following exception: Healdsburg Chamber of Commerce, Santa Rosa Chamber of Commerce, and SonomaValley Chamber of Commerece received postcard notifications of the availability of the NOP. All entities received subsequent postcard notifications of the availability of the Draft EIR.

reasonably foreseeable future actions. For additional information, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-52 Refer to responses to comments G-RRWPC-24 and G_RRWPC-25 for a discussion of the relationship of Temporary Urgency Changes to the proposed Estuary Management Project. For additional information, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-53 The Draft EIR provides a discussion of existing conditions in Chapter 3.0, Project Background and Environmental Setting based on best available data and supports conclusions in the analysis in Section 4.3, Water Quality. The discussion regarding bacteria in the Estuary relies on 2009 and 2010 sampling data. For additional discussion of water quality impacts, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. The Draft EIR does not speculate on the potential listing of the lower Russian River for 303(d) listing for bacteria. Potential cumulatively considerable impacts to bacteria levels associated with concurrent implementation of the Estuary Management Project in conjunction with other projects is determined in Draft EIR Chapter 5.0, Cumulative Analysis to be cumulatively significant.

G_RRWPC-54 Please refer to **Master Response 2.7, Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**, for a discussion of adequacy of the analysis based on best available data.

G_RRWPC-55 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion of the adaptive management process as it relates to success criteria. Draft EIR Chapter 2.0, Project Description, describes the project purpose and objectives, including the Estuary water level management targets identified in the Russian River Biological Opinion.

G_RRWPC-56 Please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_RRWPC-57 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-58 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Please also refer to the Russian River Biological Opinion, issued in 2008, which provides discussion of salmon and steelhead population conditions.

G_RRWPC-59 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion relative to historic flow data and correlation to barrier beach closure, habitat resources and fisheries, refer to Draft EIR Chapter 3.0, Project Background and Environmental Setting. Please also refer to the Russian River Biological Opinion, issued in 2008, which provides discussion of salmon and steelhead population conditions.

G_RRWPC-60 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

G_RRWPC-61 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**, for a discussion regarding flows. Draft EIR Chapter 6.0, Alternatives Analysis, (Section 6.4.6) includes the Alternative Flood Control Alternative. Draft EIR Mitigation Measure 4.2.2 requires the Water Agency to coordinate with NMFS and work with the property owners to identify measures that would, if necessary, substantially minimize or avoid any damages to existing structures that would occur as a result of implementing the project (i.e., increased flooding durations at the 7 and 9 foot elevation). As appropriate, the Water Agency shall survey properties within the 9 foot elevation in greater detail to more accurately and precisely determine the elevation of the structures potentially at risk; this information shall be kept on record at the Water Agency and a copy shall be provided to each of the property owners.

G_RRWPC-62 As stated in Draft EIR Chapter 3.0, Project Background and Environmental Setting, barrier beach closure is influenced by a number of factors, but is primarily influenced during the Lagoon Management Period (May 15 to October 15) by Pacific Ocean wave events. Project implementation would not affect Pacific Ocean water quality or wave occurrence. Please refer to Draft EIR Chapter 5.0, Cumulative, subsection 5.2.3, Climate Change and Sea Level Rise for a discussion of climate change, and potential for sea level rise to affect the implementation of the Estuary Management Project. It should be noted that implementation of the proposed project would not affect or alter the occurrence or timing of climate change or sea level rise; rather, this discussion reviews potential future scenarios, and potential effects on the successful implementation of the Estuary Management Plan Project. Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion related to the adaptive management strategy that is designed to allow the Water Agency to adjust management to respond to external factors that affect project implementation. Impact 5.2.4 (Draft EIR page 5-35) specifically addresses how climate change and sea level rise could affect project implementation, including discussion regarding beach morphology, outlet channel morphology, seepage through the barrier beach, and property flooding. Within the context of adaptive

management, the Water Agency and regulatory agencies will continue to review issues related to climate change.

Sonoma County Water Coalition
55A Ridgway Avenue, Santa Rosa CA 95401
707-494-5769

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403

BY EMAIL February 8, 2011

Dear Ms. Martini-Lamb,

The Estuary Management Project DEIR Comment

The Sonoma County Water Coalition (SCWC) includes 32 organizations representing more than 24,000 concerned citizens. SCWC strongly supports a safe, economical and reliable water supply for all living beings, including Sonoma County citizens, visitors, pets, fish, and wildlife. We support watershed protection and restoration, and careful oversight of surface and groundwater quality and groundwater resources.

SCWC requests that you address the following issues arising from the "Russian River Estuary Management Project: Draft Environmental Impact Report" released by your Agency on December 15, 2010.

As we have not yet had the opportunity to fully study this extensive DEIR on the Estuary Project, we will confine these comments to a central issue of concern: the bifurcation of the Estuary Project DEIR from the Fish Habitat Flows and Water Rights Project (Fish Flow Project). It is our view that the environmental impacts of the two projects should be reviewed in one document. In lieu of that, lower river impacts from Dry Creek downstream should be fully explored and analyzed in the Estuary Project DEIR.

SCWC objects to bifurcation of the Estuary Project from the "Fish Habitat Flows and Water Rights Project" (Fish Flow Project).

The purpose of both projects is to fulfill requirements of the Biological Opinion (BO), which in part demands that river flows be managed to allow construction and maintenance of an estuary lagoon that will provide improved habitat for threatened fish (mainly steelhead) without flooding a few low-lying Jenner properties.

G_SCWC-1

Fish Flow Project (FFP) is inexorably linked to the Estuary Project through the BO and should therefore be addressed in one environmental review. Furthermore, proposed

G_SCWC-2

Members: * Atascadero/Green Valley Watershed Council * Russian River Watershed Protection Committee * Community Clean Water Institute * Northern California River Watch * O.W.L. Foundation * Sonoma Coast Surfrider * Sonoma County Conservation Action * SWiG (Sebastopol Water information Group) * Valley of the Moon Alliance * **Supporting Organizations:** Bellevue Township * Blucher Creek Watershed Council * Coalition for a Better Sonoma County * Coast Action Group * Community Alliance with Family Farmers (N.Coast Chapter) * 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 Water Institute * Petaluma River Council * Russian River Chamber of Commerce * Sierra Club (Sonoma County Group) * Town Hall Coalition * Western Sonoma County Rural Alliance *

changes of minimum flows at Hacienda from 125 cubic feet per second (cfs) to 70 cfs has had no other stated purpose than the prevention of flooding two buildings in Jenner when the mouth is closed and the lagoon rises to a level of 9' or higher. (The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making the necessity for low flow highly questionable.) Also, there is no serious proposal to lift and/or move these buildings out of the floodway. (See Mitigation Measure on page 4.2-20) G_SCWC-2 cont.

The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. G_SCWC-3

Please address the following issues:

- In our view, CEQA requires that the entire project be considered in one environmental document. "Low flow" as called for in the lower river is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. Water quality studies and environmental analysis should be required, at a minimum, for the entire lower river from the Dry Creek convergence on down. Impacts on recreation should also be examined. G_SCWC-4
- The Estuary Project only analyzes impacts up to Duncans Mills, whereas it is stated in the DEIR that impacts from closed mouth and flow alteration affects the river as far upstream as Vacation Beach. G_SCWC-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. G_SCWC-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. G_SCWC-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. G_SCWC-8
- The Regional Board has determined that some water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. We have been told that the outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. G_SCWC-9
- The lower river experiences serious nutrient and bacteria problems at times. These appear to be exacerbated during low flows. The DEIR states that there is concern about bacteria in the Estuary during the period of the closed lagoon. This relationship should be fully examined. G_SCWC-10

- Problems with toxic blue green algae are receiving more and more attention in the "water quality world" lately. The risks can become a problem in the lower river and the closed estuary and should be addressed. G_SCWC-11

SCWC does not believe that these issues have been adequately addressed either in the Biological Opinion, nor the Estuary Project DEIR. The current environmental document is a result of segmented projects all attempting a uniform goal: saving two threatened and endangered fish species. (Chinook are listed as threatened, but for various reasons are not being considered in this DEIR.) G_SCWC-12

Thank you for the opportunity to ask these questions and raise these issues. We request that you fully respond to these issues in depth, and look forward to your response.

Sincerely,

Stephen Fuller-Rowell
Sonoma County Water Coalition

Sonoma County Water Coalition, Stephen Fuller-Rowell, February 8, 2011

G_SCWC-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion of the extent of the geographic project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**.

G_SCWC-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Refer to response to comment G_RRWPC-18 for a discussion of the objectives of the Estuary Management Project and the Fish Habitat Flows and Water Rights Project. Commenter is expressing preference for the Reduced Project Alternative. The Estuary Management Project proposes a target elevation of 7 feet with a 9 foot maximum; the Reduced Project Alternative includes an 8 foot maximum. Under the Reduced Project Alternative (8 foot maximum water level), structures would still be affected. As determined in the Draft EIR (Chapter 6.0, Alternatives Analysis, Section 6.7), the Reduced Project Alternative is identified as the environmentally superior alternative compared to the proposed project. It is not necessarily the "preferred alternative". Similarly, an Alternative Flood Control Alternative is presented and evaluated in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion, refer to **Master Response 2.5, Alternative Analysis**, in **Chapter 2, Master Responses**.

G_SCWC-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**, including discussion of project objectives. As discussed in the Draft EIR Chapter 2.0, Project Description, in order to comply with the requirements of the Russian River Biological Opinion, the Water Agency will implement adaptive management of the Estuary with the primary objectives of enhancing rearing habitat for juvenile salmonids, particularly steelhead, and managing Estuary water levels to minimize flood hazard.

G_SCWC-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Please refer to Draft EIR Section 4.7, Recreation, for discussion of potential impacts to recreation.

G_SCWC-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**.

G_SCWC-6 As discussed in Draft EIR Chapter 2.0, Project Background, and Section 4.2, Hydrology and Flooding, in the Draft EIR, the Estuary Management Project and associated lagoon outlet channel are intended to function over a range of flow conditions, not just during low flow during drought years. Therefore, a conclusion that water quality impacts would be greatest if the Estuary Management Project is implemented is not substantiated. Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for further explanation.

G_SCWC-7 As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (page 3-3) barrier beach formation and closure of the river mouth is affected by wave activity from the Pacific Ocean, with river flow being a secondary factor. The Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions.

G_SCWC-8 Refer to response to comment G_SCWC-2, above.

G_SCWC-9 For a discussion water quality, please refer response to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_SCWC-10 Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding the Draft EIR analysis of bacteria and nutrients, and the Draft EIR's characterization of existing conditions in the Estuary.

G_SCWC-11 Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for discussion of potential effects to water quality and secondary effects related to algae blooms.

G_SCWC-12 Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Please refer to Section 4.5, Fisheries for a discussion of Chinook salmon; throughout the document, this species are included under the term "salmonids". Refer to Draft EIR Section 4.5, Fisheries, specifically Impact 4.5.2, Habitat Quality, for information regarding Chinook salmon adult and smolt migration timing, relationship to the Lagoon Management Period, and a discussion of the potential project impacts to habitat parameters, including water temperature, that could affect salmonids, including Chinook.

The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

February 14, 2011

Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Re: Estuary Project DEIR

Dear Ms. Martini-Lamb:

Mine is a heavy responsibility: I have a constituency to speak for. They are the harbor seals presently in possession of a strip of sandy beach at the mouth of the Russian River. They come each year as winter storms wane to rest, socialize, birth their young and teach them the ancient Way of The Seal. Later, they shed their winter-weary coats and court and mate in the salty, buoyant waters of the estuary. In time the mothers and young leave and are replaced by solitary males who in turn leave in late fall as the winter rains prepare to fall.

These seals at the mouth of the Russian river are the largest haulout on the coast north of Point Reyes. The census in Marin County found a maximum of 2,353 adults and immatures onshore during the breeding season of 2009 – **the lowest number recorded in the past ten years.** (National Park Service, San Francisco Bay Area Inventory & Monitoring Program, December 2009). As more sandy haulouts are lost to development – and this change in estuary management must be called development – harbor seals will have a more difficult time finding places where they can rest and restore themselves. G_Seal-1

Harbor seals were identified as a marine mammal species most likely to benefit from the establishment of marine protected areas (MPAs), an indication of the importance of habitat to these animals – what actions are being taken to ensure that these seals will not be driven from their haulout by this proposal? While I know that monitoring has been put into place and construction will cease if flushing occurs and that construction is limited to times infants are not on site, I can see no way the seals will be able to remain at their haulout. I am not alone in this conclusion: Norma Jellison has expressed it well: "I do think it is likely we will lose the colony from the ongoing disruption and harassment from equipment and more people attracted to walk on the longer beach. Monitoring will not mitigate this." G_Seal-2

The estuary is being dismantled and reconstructed so that endangered salmonids will have a better chance of reproductive success. In times of abundance – before Warm Springs Dam and the subsequent growth in Sonoma County – seals and salmon co-existed in great numbers. Warm Springs Dam allowed enormous population growth in Sonoma County and the resulting inputs from agriculture, forestry, gravel mining and residential and commercial development impacted the salmonid runs. Native American gathering lands fell to the dam's construction, receiving mitigations as a sop to the loss of a sustainable way of life. WSD had a huge impact on the native fishery, essentially destroying it and replacing it with a mechanistic model. G_Seal-3

Agencies involved here also have a great responsibility. It is shameful that this country's focus on growth drives conservation. Sonoma County was built on the backs of native Americans who had their ancestral lands taken from them by force, on blacks and Asians exploited for their labor and segregated for the color of their skins, then on the growth of population made possible by the construction of Warm Springs dam. Federal, state and county agencies are being tasked to find an engineering solution to a problem caused by the very governance that now demands solutions. It is this mindset I object to. And I have a small but warm hope that some agency people agree. G_Seal-4

A holistic perspective would consider the human impact on our planet's natural systems of primary concern. It would be impossible for such a perspective to be willing to overlook the totality of the ecology found at the mouth of the Russian: the harbor seal haulout, a resting and foraging site for migratory birds and a fishery that includes Dungeness crabs, amongst other species in order to protect three endangered salmonid runs. It is time, past time, that agencies responsible for conservation of natural resource policy decision make them on a holistic understanding of ecosystems. I do not understand this apparently willful failure of agencies to carry forward an ecological perspective as called for, one would assume, in the enabling language for the Endangered Species Act. If such a vision is not part of the ESA, I submit that we need a Department of the Ecology, capable of seeing the ocean AND the river, the forest AND the trees, the seals AND the salmon. G_Seal-5

It was John Muir who said "When we try to pick anything out by itself, we find it hitched to everything else in the universe." Natural resource decision makers – this is the obligation you are under! Try to be worthy of it.

Dian Hardy
Founder, Sealwatch Program

Sealwatch Program, Dian Hardy, February 14, 2011

G_Seal-1 The Draft EIR discusses harbor seal use of the beach and interior river haulouts, and potential significant and unavoidable impact to use of these haulouts associated with the Estuary Management Project in Draft EIR Section 4.4, Biological Resources. For this assessment, please refer to Impact 4.4.8, Protected Marine Mammals, on page 4.4-79. This comment does not indicate any deficiency or question about the adequacy of the analysis or mitigation measures contained in the Draft EIR.

G_Seal-2 The Draft EIR Section 4.4, Biological Resources, discusses the potential impact of the short-term impacts associated with creation and maintenance of the lagoon outlet channel on protected marine mammal species in Impact 4.4.1. Water Agency artificial breaching activities have followed the conditions and monitoring measures established in the NMFS IHA to avoid and minimize impacts on pinnipeds at the Jenner haulout. These measures are listed on pages 4.4-69 through 4.4-71 in Impact 4.4.1. The Draft EIR further analyzes long-term adaptive management of the Estuary as a lagoon on protected marine mammal species in Impact 4.4.8. Mitigation Measure 4.4.8 details an adaptive monitoring plan that will be implemented in compliance with the NMFS IHA. Conditions are established in the IHA to avoid and minimize effects to harbor seals and their haulout, and all activities associated with Estuary management are subject to these conditions. The Draft EIR considered the IHA, drafted by government scientists and regulators with the responsibility of species protection, represents a reasonable approach for mitigating impacts and its provisions were consequently adopted. Under this adaptive monitoring plan, seal counts will continue to be conducted at the Jenner haulout and nearby coastal and river haulouts. If monitoring indicates decreases in overall use at the Jenner haulout are correlated with increases in use at the three closest haulouts, the Sonoma County Water Agency will consult with NMFS and CDFG to alter the Estuary Management Plan such that the haulout site is maintained as a resource. The IHA does not allow long-term harassment or alteration of habitat conditions that would contribute to abandonment of the Jenner haulout.

G_Seal-3 As provided in **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**, Water Agency operations have potential to jeopardize the continued existence of federally listed steelhead and coho salmon and their critical habitat. The Russian River Biological Opinion includes measures, including the Estuary Management Project, to modify practices to avoid jeopardizing these species and their critical habitat and to enhance rearing habitat for juvenile salmonids within the Estuary.

G_Seal-4 This comment does not indicate any deficiency or question about the adequacy of the analysis or mitigation measures contained in the Draft EIR.

G_Seal-5 The Draft EIR recognizes a variety of aquatic and terrestrial species rely on estuarine habitat for some or all of their life phases. Draft EIR Section 4.5, Fisheries, includes analysis of other non-Endangered Species Act-protected aquatic species, including Dungeness crab.

Megan Steer

From: Sonoma Coast Chapter of Surfrider Foundation [sonomacoastsurfrider@comcast.net]
Sent: Sunday, February 13, 2011 11:25 AM
To: estuaryproject
Cc: Jessica.Martini.Lamb@scwa.ca.gov
Subject: Surfrider Estuary DEIR COMMENTS.doc

SURFRIDER
FOUNDATION
SONOMA COAST CHAPTER

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 70,000 members and 90 chapters worldwide.

Comments and Concerns for the Draft Environmental Impact Report on the Russian River Estuary Management Project:

Surfrider wishes to express our continued concern on the impact to surfing at the River Mouth as well as surfing areas south of the river including North Side Goat Rock, South Goat, Blind Beach, and the Far Cove that will be the result of the Estuary Management Project. These premier Sonoma County surf recreation areas depend greatly on the influx of new sand and gravel. The combination of modifying breaching practices and lower flows will remove the possibility of surfing these areas. Surfrider has determined that the mouth of the Russian River is a high quality surfing location and legally protected under the California Coastal Act. G_Surf-1

Section 30213 of the Act states:

"*Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*"

Surfing locations are a prime example of low cost visitor and recreational opportunities.
The overview of the California Coastal Commission enforcement program states:
"The mission of the Commission's enforcement program is to protect coastal resources by: assuring that proposed development projects are consistent with the Coastal Act, which is accomplished via the permit review process required by the Coastal Act; that required coastal development permits (CDPs) are obtained for all development in the Coastal Zone; that all terms and conditions of CDPs are complied with; to generally deter and address violations of the Coastal Act; and to work with local governments to assist them in enforcing coastal protection policies." G_Surf-2

The California Coastal Act Section 30220 further states:
"Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses." G_Surf-3

Surfing in Sonoma County can only be practiced in the ocean and never at inland areas. The Surfrider organization and supporters are particularly protective of surfing locations on the Sonoma Coast, especially the high quality ones, as they are available to the public in very limited supply. Sonoma County has only 9 surfing areas. As of today, out of those 9 areas, 3 are totally closed to public access, one is partially closed (Bodega Head) and access to Salmon Creek is greatly reduced (the Dunes & Bean Avenue Parking lot closures). There are also fees for ½ of these areas. Access to surfing is already limited to Sonoma County residents. The loss of surfing at the River Mouth for half of the year due to the inlet channel and its construction efforts will now eliminate surfing at one of the only free surfing areas on the entire Sonoma Coast. In addition-the more northern surf areas and Bodega Head are less frequently used due to level of experience required or travel time, therefore, only 2 possible areas remain for surfing –primarily-Salmon Creek & the River Mouth. The Estuary Management project therefore reduces the potential surf areas by ½ in Sonoma County during the months proposed. G_Surf-3 cont.

Except for extreme drought years, the mouth has usually been open during the summer over the last 100 years. The SCWA Estuary Management events from 1996-2010 have averaged about 3 breachings during the May 15th-Oct. 15th time period. Therefore the mouth is open almost all of the 150 days of that period and allows for formation of sandbars which combined with swell create surf for residents to enjoy. Closing the mouth of the river and preventing the movement of sand and gravel will result in the loss of surf at the River Mouth as well as surfing at Goat Rock State Beach which also depends on this influx. The loss of over 5 months of surf at two locations which are free and accessible to the residents of Sonoma County **IS** a significant impact to recreation for Sonoma County residents. This is inconsistent with the Coastal Act as identified in the DEIR. G_Surf-4

To quote SCWA's DEIR Impact 4.7.2: Eliminate or Modify an Existing Recreational Resource: "*The proposed project would likely reduce the occurrence of open channel tidal conditions conducive to surfing activities*." It goes on to say "*This potential impact may be inconsistent with the California Coastal Act…*" and no feasible mitigation measures are identified.

Possible mitigation measures should include opening and improving access to other surf areas in Sonoma County or possible construction of an artificial reef at the River Mouth. Surfrider Foundation's position on artificial reefs is that all effort should principally be directed towards protecting natural waves, and that structures should only be pursued in cases of mitigation for lost or damaged surfing resources. Projects of this nature have had some success in creating waves in other areas however the nuances of wave formation are complex. Please enjoy the following link. G_Surf-5

http://www.youtube.com/watch?v=mGYuj-Ow1rk

Once the Estuary management project fails, as it is destined to do, the alternative cost of removal of the existing jetty could be greatly reduced if the rocks did not have to be removed but instead used to create an artificial reef.

The potential failure of the Estuary Management Project is acknowledged in the DEIR Conclusion on page 4.6-22
"It remains unclear whether the proposed project would result in a highly productive freshwater lagoon system during the lagoon management period, or whether the less productive and potentially adverse conditions characteristic of a partially converted stratified lagoon would predominantly occur." G_Surf-6

It goes on:
"A partially converted lagoon could potentially impact resident fish species, especially rearing steelhead, due to a reduction of water quality and habitat function, leading to increased stress or mortality as a result of increased water temperatures, reduced dissolved oxygen levels, or reduced foraging potential due to loss of estuarine productivity. A reduction in productivity or habitat function within the Estuary could result in a further potential indirect impact related to increased competition in unaffected areas where suitable habitat persists. Additionally, stratification could result in a reduction in the total area of available suitable habitat for a range of fish species due to adverse water quality conditions in the lower water column."

The Russian River Mouth is revered by surfers and others who enjoy ocean recreation. Salmon populations are too at risk to afford a "trial and error" approach. The potential impact is far greater than any benefit listed in this DEIR and actually reduces the likelihood of that benefit to occur. G_Surf-6 cont.

The increased presence of machinery on the beach (from an average of three days historically to the requested eighteen) is both harmful to marine mammals who haul out at this location and disruptive to those who previously enjoyed the serenity. G_Surf-7

The Surfing Community of Sonoma County requests that the impact on the wave and water quality in the ocean environment be considered in the Environmental Impact Report on the Russian River Estuary Management Project. The Surfrider Foundation promotes responsible acts to preserve, restore, and protect the salmon population. G_Surf-8

Please direct any inquiries on this matter to
Sonoma Coast Chapter of Surfrider
sonomacoastsurfrider@comcast.net

Sonoma Coast Chapter of Surfrider Foundation, February 13, 2011

G_Surf-1 Draft EIR Section 4.7, Recreation, analyzes the potential elimination of availability of surfing wave conditions, and consistency with the California Coastal Act, during the Lagoon Management Period and concludes that there would be a significant and unavoidable impact. There is no substantial evidence to demonstrate the other surfing areas south of the river, including North Side Goat Rock, South Goat, Blind Beach, and the Far Cove, would be affected by the Estuary Management Project.

G_Surf-2 This comment is a statement about the California Coastal Act and not directed to the environmental impacts of Draft EIR for the Estuary Management Project; therefore no changes in the Final EIR are necessary.

G_Surf-3 This comment is a statement about other surfing locations and access issues in Sonoma County and not directed to the environmental impacts of Draft EIR for the Estuary Management Project; therefore no changes in the Final EIR are necessary. Impact 4.7.2 in the Draft EIR, page 4.7-10, discloses a potential significant and unavoidable impact related to the existing surfing resource.

G_Surf-4 Comment asserts that the river mouth is open 150 days during Lagoon Management Period, and breached an average of three times. These assumptions are not supported in the comment, and differ from the information presented in Draft EIR Chapter 2.0, Project Description. Based on data in Table 2-1, the average number of breach events during the Lagoon Management Period is 5 events. The information in Chapter 2.0 also indicates that barrier beach closure can last between 5 and 14 days. Therefore, under existing conditions, assuming an average of 5 artificial breaching events, the mouth of the Russian River is closed between 25 and 70 days of Lagoon Management Period. This closed condition will continue to naturally occur, for shorter or longer durations depending upon year type, irrespective of the proposed project. Therefore, these conditions are currently experienced by the local surf community.

As presented in the Draft EIR, implementation of the Estuary Management Project would increase the number of days of closed mouth conditions compared to the number currently experienced, on average. It should be noted that open Estuary conditions may continue to occur periodically during the Lagoon Management Period, depending upon outlet channel performance. However, as noted in the Draft EIR, the reduction in the occurrence of open channel conditions and resultant impact on the recreation resource associated with surfing is considered significant and unavoidable.

G_Surf-5 Refer to **Master Response 2.6**, **Recreational Impacts, Socioeconomic Impacts, and Mitigation Requirements**, in **Chapter 2, Master Responses**, for a discussion of recreational impacts, consistency with the California Coastal Act, and mitigation considerations. The analysis provided in Draft EIR Section 4.7, Recreation, recognizes the California Coastal Commission has jurisdiction at the project site and would be responsible for making a consistency determination of the project with Coastal Act policies. It is anticipated that issuance of permits from the California Coastal Commission would be considered based on Commission review of competing beneficial resources, and contingent upon permit conditions, restrictions, and mitigation requirements.

G_Surf-6 Refer to **Master Response 2.3 Project Feasibility,** in **Chapter 2, Master Responses** for a discussion of adaptive management as a process and as required by the Russian River Biological Opinion.

G_Surf-7 Draft EIR Section 4.4, Biological Resources, discusses the potential short-term impacts associated with creation and maintenance of the lagoon outlet channel on protected marine mammal species in Impact 4.4.1.

G_Surf-8 Draft EIR Section 4.7, Recreation, analyzes the potential elimination of availability of surfing wave conditions during the Lagoon Management Period and concludes that there would be a significant and unavoidable impact. With respect to the potential project effect on ocean water quality, the Draft EIR Section 4.2, Hydrology and Flooding, and Section 4.3, Water Quality, discuss potential short term effects to water quality, including sedimentation to the surf zone, associated with outlet channel creation. Draft EIR Section 4.3, Water Quality, focuses on water quality conditions within the Estuary associated with perched lagoon conditions within the Estuary. Ocean water quality conditions within the surf zone and near-shore environment are not anticipated to be adversely affected by implementation of the Estuary Management Project, as conditions are under the influence of dynamic near-shore processes. Russian River outflow is reduced by barrier beach formation periodically during summer months under existing conditions without demonstrable changes in ocean water quality. It should be noted that Goat Rock State Beach is on the County's list of ocean beaches for bacteria sampling for protection of public health. Results posted since 2005 did not show any exceedances (Sonoma County Environmental Health Division, 2011).

As discussed in Draft EIR Chapter 3.0, Project Background and Environmental Setting, the Water Agency monitors water quality in multiple locations within the Estuary (refer to Draft EIR Chapter 3, Project Background and Environmental Setting, and Section 4.3, Water Quality, for information regarding water quality monitoring), including a station at the mouth of the

Russian River. Trends in water quality at the mouth of the river would inform adaptive management actions during the lagoon management period.

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SEBASTOPOL WATER INFORMATION GROUP

February 12, 2011

To: Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd., Santa Rosa, CA, 95403

From: Jane Nielson, Sebastopol Water Information Group (SWiG)

Subject: SWiG Comments on SCWA Russian River Estuary Management Project Draft Environmental Impact Report

The Sebastopol Water Information Group (SWiG) is an alliance of west County well owners and Sebastopol residents, providing Sonoma County citizens with accurate scientific information on water supplies and water quality. Knowing that human life support depends on the preservation of functioning river systems and wetlands, SWiG supports policies that protect the rivers and riparian areas that are critical life support for native species.

SWiG members are concerned about the rapid decline of anadromous fish populations in the Russian River system, and would support effective measures for reversing the decline. We understand that the Estuary Project is one of the projects proposed in NMFS' 2008 Biological Opinion for lessening destructive impacts from the Sonoma County Water Agency's Russian River system operations.

The Estuary Management project is proposed to provide a nurturing environment for young steelhead. But developing the required freshwater conditions depends on how the river functions throughout its lower reaches, on the effects of myriad regulated and unregulated land uses, and on the effects of other projects, especially the potential for addition of water from Lake Sonoma through Dry Creek, and the "Fish Flow Project" that would lower flows from Lake Mendocino, as proposed in the 2008 Biological Opinion.

A major concern is the separation of the Estuary Management project from the "Fish Flow" and Dry Creek Restoration projects in writing this environmental document. Writing a separate DEIR for each project, as though they would not affect each other is unrealistic. Rivers are very complex systems, which continuously adjust to water inputs and withdrawals, sediment loads, and sediment withdrawals. Intensive land uses from urbanization, forest removal, gravel mining, and agricultural practices in the Russian River have severely impacted the lower reaches. Many of these impacts continue to expand. G_SWIG-1

Sediment, released by all these human activities, has filled in the lower river's formerly deep gravel-based pools with finer sediment, eliminating most of the sites where steelhead and coho salmon hatchlings once were nurtured during low summertime river flows. The Estuary Management project is proposed as an attempt to re-create a reliable nursery for young fish. The question is, will this work as intended? G_SWIG-2

To evaluate the Estuary Management project's potential for nurturing steelhead requires evaluation of the impacts on the lower river from the change to lower summertime flows (under a changed Descision 1610) and changed flows from Dry Creek. All these changes will have to mesh well with changed Estuary Management to have the anticipated beneficial effects. Unfortunately, this DEIR evaluates only the Estuary Management project in isolation. This is a severe defect. G_SWIG-3

To understand whether the Estuary Management project can function as hoped requires understanding how the Estuary will respond to closure and lower flows, over a wide range of weather and oceanic conditions. But there is only one extended (29-day) study of the closed Estuary (which did become nicely stratified as hoped) and only a few locations have been consistently sampled for water quality, and most data were collected only over the past decade. As a result, only sparse data are available for evaluating year to year water quality and other conditions in the lower Russian River as far upstream as Vacation Beach under current operating conditions. This means that predictions of water quality conditions under the proposed lower river flows (Fish Flow) and closed lagoon conditions are entirely speculative. G_SWIG-4

The DEIR explains that "the Estuary Management Project proposes implementation of an Adaptive Management Plan that would, by definition, monitor and react to conditions that are observed in the Estuary during the course of its implementation," and "it may not be possible to precisely predict the effects of the proposed Estuary Management Project to the degree typically provided for under CEQA …Within this context, the Water Agency recognizes that the precise response of the Estuary cannot be predicted with certainty."

The DEIR writers then fall into the trap of assuming that project "conditions" "will remain within the range of those experienced within the Estuary over the past 15 years." The DEIR thus bases its projections of how the closed Estuary will function on sparse data from the years 1996 to 2009, along with the performance of other coastal estuarine lagoons.[1] In a time of rapid climate warming, this outlook is unrealistically optimistic. Even without climate warming, the length of record keeping does not begin to reveal all the possible oceanic and riverine conditions that could arise over the life of the project. G_SWIG-5

This brings up the issue that the DEIR does not state what the life of the project is contemplated to be. If, in spite of Adaptive Management strategies, the project fails to support increased populations of anadromous fish, we can expect it to end when the fish are all gone. (We have to note that so far no US programs have succeeded at reversing anadromous fish population collapse). If monitoring programs show the project succeeding, is there a mechanism for extending it indefinitely in a financially sustainable format? G_SWIG-6

To counteract its current tone of unrealistic optimism, the DEIR needs to explore a number of foreseeable "bad case" (if not "worst case") scenarios. These include effects of climate change, such as:

- rising ocean levels, due to rapid climate warming, which are likely to narrow and eventually eliminate the barrier beach and over the long term may drown the estuary[2]. Over the next decade, the advancing ocean could increase or lower the number of yearly natural estuary closures. Conditions that increase the number of closures would not materially change the DEIR analysis, but lowered numbers of closures would require rethinking the project.

The DEIR should discuss appropriate responses to a string of years with no natural closures. G_SWIG-7

- US Geological Survey climate change projections forecast the potential for decade-long droughts, which show up in the geologic record over the most recent 30,000 years. In spite of the recent 3-year drought (winter 2006 to winter 2009), the DEIR does not discuss the response to even a 2-year drought, G_SWIG-8

[1] "It is anticipated that conditions would remain within the naturally occurring range of water quality parameters observed within the Estuary, based upon monitoring conducted by the Water Agency and others, and that conditions would be consistent with those observed in other estuary systems. Additionally, alterations in water quality are not anticipated to conflict with parameters established in the RWQCB Basin Plan to be protective of beneficial uses."

[2] The geologic literature documents many drowned coastlines. One example of a non-glaciated drowned coast is the eastern United States' offshore continental shelf.

yielding a span of years when reservoir levels might not sustain even the proposed lower Fish Flow water releases.
The DEIR should be amended to discuss the effects of elongated drought periods, and possible mitigations. G_SWIG-8 cont.

In addition, the Project's water quality monitoring program is primarily aimed at examining the estuary conditions, and there is no mitigation proposed for the possibility that ground water wells will become increasingly saline over a 5-month closure. But the Fish Flows project is intended to lower river flows into the estuary, and well owners in the lower river and Estuary need at least a consistent monitoring program to track well salinity levels. Such a program needs to be added to the project and discussed in the DEIR. G_SWIG-9

The Fish Flows project also requires that SCWA monitor the river upstream from the Estuary, to gauge the total impacts of projects pursued for Biological Opinion compliance, including changes in beach widths and morphologies, and river water quality parameters. These monitoring programs must be designed to sample the same sites consistently, analyze for the same set of pollutants every year, and provide data sets and analyses for public review in a timely fashion. G_SWIG-10

Finally, SWiG does not agree that a reduced project is an Environmentally Superior Alternative. We believe that the Habitat Restoration Alternative should be revised to become the extension of the Estuary Management Project, thus creating a truly Environmentally Superior Alternative. G_SWIG-11

Focusing all efforts on the Russian River estuary makes sense only for the short term. If the aim is truly to re-establish fish populations, the Estuary Management Project fails by putting all the hatched fish eggs into one basket. Other deep pool sites, in Austin Creek, Freezeout Creek, and other tributaries, also need to be restored for rearing habitats. The Estuary Management Project should be only the first step toward a broader program of tributary restoration, in partnership with local landowners. And the next step is to address all the unpermitted withdrawals that tend to de-water Russian River tributaries, stranding fish hatchlings before they can ever reach the river mouth estuary. G_SWIG-12

Sincerely,

Jane Nielson

Jane Nielson, Ph.D. (Geologist)
Sebastopol Water Information Group
3727 Burnside Road
Sebastopol, CA 95472
jenielson@comcast.net

cc:
Jessica Martini-Lamb, SCWA
Grant Davis, SCWA
Catherine Kuhlman, NCRWQCB

Sebastopol Water Information Group, Jane Nielson, February 12, 2011

G_SWIG-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project and the Dry Creek Restoration Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. Analysis of other issues within the Russian River watershed, including those listed by the commenter, is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

G_SWIG-2 Please refer to **Master Response 2.4, Water Quality** for a discussion of sediment. Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**.

G_SWIG-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR, Chapter 5.0, Cumulative Analysis, discloses to potential cumulative impacts of the Estuary Management Project in consideration with the Fish Habitat Flows and Water Rights Project.

G_SWIG-4 Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, and **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses** for a discussion of availability of water quality data and analysis under CEQA.

G_SWIG-5 Please refer to and **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis,** in **Chapter 2, Master Responses.** Please refer to Chapter 5.0, Cumulative, subsection 5.2.3, Climate Change and Sea Level Rise, beginning on page 5-2, for a discussion of climate change, and potential for sea level rise to affect the implementation of the Estuary Management Plan.

G_SWIG-6 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. The Russian River Biological Opinion requires implementation actions within specific timeframes and re-evaluation of the project over the period covered in the Biological Opinion, through 2023. Extension of the project would be reviewed as part of the adaptive management plan and regulatory process.

G_SWIG-7 Please refer to Draft EIR Chapter 5.0, Cumulative Analysis, subsection 5.2.3, Climate Change and Sea Level Rise, for a discussion of climate change, and potential for sea level rise to affect the implementation of the Estuary

Management Project. It should be noted that implementation of the proposed project would not affect or alter the occurrence or timing of climate change or sea level rise; rather, this discussion reviews potential future scenarios, and their potential effect on the successful implementation of the Estuary Management Plan Project.

Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion related to the adaptive management strategy that is designed to allow the Water Agency to adjust management to respond to external factors that affect project implementation. Impact 5.2.4 (Draft EIR page 5-35) specifically addresses how climate change and sea level rise, could affect project implementation, including discussion regarding beach morphology, outlet channel morphology, seepage through the barrier beach, and property flooding. Within the context of adaptive management, the Water Agency and regulatory agencies will continue to review issues related to climate change.

G_SWIG-8 For a discussion of the relationship of the Estuary Management Project to the river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Minimum flows in a dry year are 70-85 cfs at Hacienda Bridge, and 35 cfs in a critically dry year. These flows, which could occur under drought conditions, are considered in the range of flows that could potentially be experienced (Draft EIR, Section 3.3, page 3-3). The Estuary Management Project has been developed to adaptively manage the Estuary under any likely range of flow conditions following barrier beach formation under varying hydrologic year types and conditions. See response to comment G_SWIG-7, above, for a discussion of adaptive management to adjust management to respond to external factors that affect project implementation.

G_SWIG-9 As discussed in Impact 4.3.4 in Draft EIR Section 4.3, Water Quality, the change in the barrier beach breaching operations during the Lagoon Management Period could change the duration and/or geographic extent of saline conditions in the Estuary. This could extend the period of time groundwater wells experience brackish water intrusion and is considered a significant and unavoidable impact.

G_SWIG-10 The Water Agency will continue its current Estuary water quality monitoring program, and will modify that program to gather appropriate water quality information, in consultation with regulatory agencies, as needed. For a discussion related to water quality and subsequent monitoring requirements, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. The Water Agency will consult with the SWRCB and NCRWQCB to determine the parameters, water quality standards, and monitoring locations.

G_SWIG-11 For a discussion of the selection, range, and evaluation of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2 Master Responses**.

Final project approval will be made by the Water Agency Board of Supervisors based on full review of environmental considerations.

G_SWIG-12 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

Redwood Empire Trout Unlimited
P.O. Box 3237
Santa Rosa, CA 95402-3237

February 14, 2011

Sonoma County Water Agency
Attn: Jessica Martini-Lamb, Principal Environmental Specialist
404 Aviation Boulevard
Santa Rosa, CA 95403

RE: Draft Environmental Impact Report for the Russian River Estuary Management Project (Estuary Project)

This letter is to add further comments to our previous comment letter of June 17, 2010, which is also attached. This letter incorporates new comments based on information disclosed about the Estuary in this document and at hearings such as the one held in Jenner on January 18, 2011. G_TU-1

We were very disappointed to learn on January 18 the actual nature of the 9 structures that reportedly "flood" in the Russian River Estuary. These structures have been used to justify artificial breaching which results in a TAKE of endangered Coho salmon and threatened Steelhead. The Redwood Empire Chapter of Trout Unlimited has been objecting to artificial breaching since the early 1990s as evidenced by articles in our Chapter's newsletter from that time.

Imagine our reaction to learn after almost 20 years of protests that of these 9 structures, 7 ARE DOCKS and 1 IS A BOATHOUSE. Thousands of juvenile salmonids attempting to rear in the Russian River Estuary have been killed by the Sonoma County Water Agency by artificially breaching the estuary over the last 20 years. And it has been done for 7 DOCKS and 1 BOATHOUSE and the State Parks Visitors Center. G_TU-2

The Sonoma County Water Agency stubbornly insists on continuing this program that is subsidizing by Sonoma County's property taxpayers only to benefit 9 private property owners. At a time of fiscal crisis at the County of Sonoma this unusual subsidy is very troubling.

We would have the following addition comments:

Juvenile Coho salmon, which have been raised in the Captive Coho Brood Stock Program, are being killed by artificial estuary breaching that can send them out to the ocean before they mature enough to survive. Recently 2,000 Coho juveniles from the brood stock program out migrated from Austin Creek into the Estuary. The estuary was breached by the SCWA and these Coho were presumably lost at great cost. G_TU-2 cont.

This is another ecological and fiscal calamity that SCWA insists on perpetuating by artificially breaching the Russian River mouth with heavy equipment rather than waiting for it to occur naturally when conditions are right. This is normally shortly after the SCWA breaches the Estuary artificially. G_TU-3

The DEIR is not adequate because it assumes the artificial breaching is the baseline condition and the "no project alternative". Logically, NO BREACHING should be the no project alternative. It would also be recognized as the environmentally preferred alternative in an adequate DEIR document, which in spite of its overwhelming length at 631 pages this document is not. G_TU-4

We were glad to see the Estuary study area extended to Austin Creek but it has become clear that it should be extended to Monte Rio as the River backs up to this point creating continuous habitat for threatened and endangered salmonids from the mouth to Monte Rio. An Estuary Management Plan should be produced that extends to Monte Rio. G_TU-5

The SCWA is violating the ESA by not implementing the Reasonably Prudent Alternative (RPA) specified by National Marine Fisheries under their jeopardy opinion. This means the Sonoma County Water Agency is in violation of the Endangered Species Act and is TAKING threatened and endangered salmonids when they artificially breach the estuary in any manner no prescribed by National Marine Fisheries. G_TU-6

Our recommend Estuary Plan would include: G_TU-7

1) Elevate the 9 properties that "flood" immediately and end breaching.
2) Remove the jetty that has been identified in numerous comments as a major obstacle to natural estuary functioning.
3) Use rock materials from the jetty removal to build habitat structures in the estuary to benefit juvenile salmonids and reduce predation.
4) Develop an Estuary Management Plan that extends to Monte Rio and include restoration of high value back flooded habitat along the estuary shore particularly on new Open Space Lands.

Thank you for the opportunity to comment and we look forward to working with you to restore the Russian River's extremely important freshwater estuary habitat that will be home to thousands of rearing juvenile Steelhead and Coho Salmon as are other properly managed estuaries on the North Coast of California.

Sincerely,
REDWOOD EMPIRE CHAPTER
TROUT UNLIMITED

R. Brian Hines
Board of Directors

Redwood Empire Trout Unlimited
P.O. Box 3237
Santa Rosa, CA 95402-3237

June 17, 2010

Sonoma County Water Agency
Attn: Jessica Martini-Lamb, Principal Environmental Specialist
404 Aviation Boulevard
Santa Rosa, CA 95403

RE: Draft Environmental Impact Report for the Russian River Estuary Management Project (Estuary Project)

We are writing to you to express our support for the Sonoma County Water Agencies 2010 Estuary Project. If successful, the proposed project has the potential to increase estuarine habitat for ESA listed Coho salmon and Steelhead.

While conducting the project, Redwood Empire Trout Unlimited would like the Sonoma County Water Agency to take into consideration the following comments for various aspects of its Estuary Project.

- Extend the Upper Estuary monitoring to include the Austin Creek confluence to the Hwy 116 Bridge. Review of the SCWA's '*Russian River Fish and Macro-Invertebrate Study, 2003-2005*' illustrates that a large portion of the salmonid and steelhead sample distribution is found within the Upper Estuary/Cassini reach. Past in-stream habitat improvements of lower Austin Creek have created rearing and migration opportunities which the Estuary Adaptive Management Plan may enhance. Expanded and continual monitoring of this area is vital in verifying that it can remain suitable migration and rearing habitat for Austin Creek Salmonid and Steelhead within this reach. G_TU-8
- Re-prioritize the removal of the jetty located at the mouth of the estuary. Use the rock and other appropriate demolition debris to create additional habitat structures within the Estuary. G_TU-9
- Restore the Open Space District properties in the Middle Reach/Bridgehaven area and similar low lying areas to create flooded/backchannel habitat. Monitor and consider additional adaptive management options to promote sustainable Benthic and Macro invertebrate habitat consistent with periodic inundated estuarine habitat. G_TU-10

Comment Letter G_TU
Attachment

- Re-prioritize the elevation, re-location or removal of the private properties located in Jenner between the 8'-8.5' flood levels. If the adaptive management plan results are found to be positive while maintaining a proposed 7' flood level; consideration should be given to maintaining a higher estuarine water level to increase and sustain suitable estuary rearing habitat. Proposed water flow decrease from upriver could have the potential to increase estuary water temperatures. Additional water depth may be needed to ensure that water temperatures remain below potential lethal levels. The end goal of the plan should be to cease mouth breaching operations entirely which we consider to be TAKE under the ESA. G_TU-11
- Re-introduce historic native estuary vegetation to the lower reach to further support and provide salmonid rearing and Benthic and Macro invertebrate habitat. G_TU-12
- We would also be interested in seeing an accounting of the cost to breach the estuary as it seems to be an unusual subsidy in these lean Sonoma County budget times. The subsidy benefits only a few property owners that have chosen to build in the recognized flood plain. Funding is available for the elevation of structures on the Russian River as has been done in many locations upstream. The Redwood Empire Chapter of Trout Unlimited has been advocating the elevation of these structures since at least 1992. G_TU-13

We appreciate the opportunity to present to you our thoughts regarding the Draft Environmental Impact Report for the Russian River Estuary Management Project. Feel free to contact us if you have any questions or would like to discuss these items in depth.

Sincerely,
REDWOOD EMPIRE CHAPTER
TROUT UNLIMITED

Rick Baker, Past-President
Board of Directors

Redwood Empire Trout Unlimited, Brian Hines, February 14, 2011

G_TU-1 The previously submitted scoping letter, re-submitted as an attachment, is incorporated into the record. Comments were considered in the Draft EIR. Individual responses to Attachment 1 are provided in Responses G_TU-8 through G_TU-13.

G_TU-2 Please refer to **Master Response 2.3, Project Feasibility**, for a discussion of the Estuary Management Project objectives to modify current management practices to enhance rearing habitat for juvenile salmonids within the Estuary. Draft EIR Chapter 5.0, Cumulative Analysis, discusses the Estuary Management Project relative to the Coho Broodstock Program.

G_TU-3 Draft EIR Chapter 2.0, Project Description, Section 2.2, includes a discussion of current Estuary management activities.

G_TU-4 Refer to Master **Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses** for a discussion related to CEQA requirements regarding definition of baseline conditions. Refer to **Master Response 2.5**, **Alternatives Analysis**, in **Chapter 2, Master Responses**, and Section 6.3.1 in Draft EIR Chapter 6.0, Alternatives Analysis, for additional information on alternatives selection.

G_TU-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

G_TU-6 The Water Agency is not violating the Endangered Species Act; the Estuary Management Project is responding to specific directives in the Russian River Biological Opinion to avoid jeopardizing listed steelhead and coho salmon and their critical habitat. The Estuary Management Project is consistent with requirements by the Biological Opinion and with the Incidental Take Statement provided in the Biological Opinion for estuary management activities. Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion of the Estuary Management Project objectives relative to the Biological Opinion's requirements.

G_TU-7 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, in **Chapter 2, Master Responses**, for a discussion of the alternatives screening and selection process, reasonable range of alternatives and environmental analysis.

G_TU-8 Pursuant to scoping comments received on the Notice of Preparation for the Estuary Management Project, the geographic scope of analysis was expanded to include areas upstream of Austin Creek, as discussed in the Draft EIR project Description, and in **Master Response 2.2, Project Description and Impact Analysis**, in **Chapter 2, Master Responses**. The Water Agency will continue its current Estuary water quality monitoring program, and will modify that program to gather appropriate water quality information required under the Russian River Biological Opinion, in consultation with regulatory agencies, as appropriate. For a discussion related to water quality and subsequent monitoring requirements, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

G_TU-9 The study of jetty modification is included as an alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For a discussion of the selection, range, and evaluation of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2 Master Responses**.

G_TU-10 A Habitat Restoration Alternative is included as an alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For a discussion of the selection, range, and evaluation of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2 Master Responses**. Final project approval will be made by the Water Agency Board of Supervisors based on full review of environmental considerations.

G_TU-11 An Alternative Flood Control Alternative is included as an alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For a discussion of the selection, range, and evaluation of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2 Master Responses**. Final project approval will be made by the Water Agency Board of Supervisors based on full review of environmental considerations. The Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific project objectives of the Estuary Management Project are established in Draft EIR Chapter 1.0, Introduction, and include providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and while minimizing flood hazard.

G_TU-12 A Habitat Restoration Alternative is included as an alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis.

G_TU-13 CEQA does not require a cost benefit analysis of existing conditions.

3.3 Responses to Individual (No Affiliation) Comments

This section includes copies of comment letters from individual commenters and corresponding responses. Comment letters are arranged alphabetically by commenter last name.

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 21 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CLARA A AHLBACH
(Name: Please Print) PROPERTY ADDR: RIO NIDO, CA

MAILING: 33 WAKEFIELD AV
(Street Address)

DALY CITY, CA 94015
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Ahlba-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and to enjoy the beauty of the Redwoods there. NA_Ahlba-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ahlba-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ahlba-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ahlba-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ahlba-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ahlba-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ahlba-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ahlba-9

Sincerely,

Clara A Ahlbach — Jan 18, 2011
(Signature) (Date)

Clara A. Ahlbach, January 18, 2011

NA_Ahlba-1 Commenter's name and address added to distribution list.

NA_Ahlba-2 Commenter is identifying individual uses of the Russian River.

NA_Ahlba-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlba-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlba-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer **to Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Ahlba-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer **to Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ahlba-7 For a discussion of the relationship of the Estuary Management Project to river flows, please refer **to Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlba-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ahlba-9 For a discussion of potential impacts to water quality, please refer to **Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Bruce AHLVIN
(Name: Please Print)
12160 SUMMERHOME PARK RD
(Street Address)
Forestville 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Ahlvi-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Ahlvi-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ahlvi-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ahlvi-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ahlvi-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ahlvi-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ahlvi-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ahlvi-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ahlvi-9

Sincerely,

Bruce R Ahlvin 1.11.11
(Signature) (Date)

Bruce Ahlvin, January 11, 2011

NA_Ahlvi-1 Commenter's name and address added to distribution list.

NA_Ahlvi-2 Commenter is identifying individual uses of the Russian River.

NA_Ahlvi-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlvi-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlvi-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Ahlvi-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ahlvi-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ahlvi-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ahlvi-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Sherrie Althouse & John Obertelli Jr.
(Name: Please Print)
15326 Willow Rd (POBox 195)
(Street Address)
Monido CA. 95471
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Altho1-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and recreation & drinking water. NA_Altho1-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Altho1-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Altho1-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Altho1-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Altho1-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Altho1-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Altho1-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Altho1-9

Sincerely,
Sherrie Althouse & John Obertelli 1-19-11
(Signature) (Date)

Sherrie Althouse & John Obertelli Jr., January 19, 2011

NA_Altho1-1 Commenter's name and address added to distribution list.

NA_Altho1-2 Commenter is identifying individual uses of the Russian River.

NA_Altho1-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altho1-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altho1-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Altho1-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Altho1-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altho1-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Altho1-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Altho2

Megan Steer

From: Sherrie [sherandj@comcast.net]
Sent: Monday, February 14, 2011 6:58 AM
To: estuaryproject
Cc: Jessica.Martini.Lamb@scwa.ca.gov
Subject: Russian River Estuary Management Project: DEIR

Dear Ms. Martini-Lamb,

We are writing to express our concerns regarding the Russian River Estuary Project DEIR. We have lived along the lower Russian River for
35 years where we own our home. The river is part of our life, the source of our drinking water and a place for recreation and reflection. We are deeply concerned about the state of the river and the many threats that effect the quality and health of this important resource. NA_Altho2-1

We have tried to understand how closing the mouth to create an estuary lagoon is going to improve the situation. We NA_Altho2-2
feel the low flow project must be considered in one environmental document rather than studied separately from the NA_Altho2-3
estuary plan. CEQA requires that the project be considered in one environmental document. It seems very likely we NA_Altho2-4
could end up with a lagoon of toxic water which will certainly defeat the purpose of improving habitat for threatened fish.
We would like to see a broad range of water quality issues addressed in the DEIR and their effect on the proposed NA_Altho2-5
estuary management project.

The river's health needs to be studied and managed by considering the entire watershed and not just one little piece of NA_Altho2-6
the picture. The loss of riparian woodland, gravel mining, water diversions, pollution and sedimentation must all be
considered. We would like to see continued environmental monitoring and analysis, including recreational, public health
and economic impacts of the project. We would like assurance that this report will mitigate all potential impacts from NA_Altho2-7
this project.

Please add our name and address to your notification list for meetings and documents related to this project. NA_Altho2-8

Sincerely,
Sherrie Althouse and John Obertelli Jr.
15326 Willow Road
P.O.Box 195
Rio Nido,CA. 95471

Sherrie Althouse & John Obertelli Jr., February 14, 2011

NA_Altho2-1 Draft EIR Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures, considers potential impacts to quality of the river from an environmental resource perspective, and analyzed resources including geology, hydrology, water quality, biological resources, fisheries, land use, recreation, cultural resources, noise, air quality, hazards and hazardous materials, public services and utilities, and aesthetics.

NA_Altho2-2 As discussed in Draft EIR Chapter 2.0, Project Description, the purpose of the proposed Estuary Management Plan is to comply with the requirements of the Russian River Biological Opinion to adaptively manage the Estuary with the primary objectives of enhancing rearing habitat for juvenile salmonids, particularly steelhead, and managing Estuary water levels to minimize flood hazard. The proposed project does not include "closure" of the Russian River mouth to create lagoon conditions; rather the lagoon outlet channel would be implemented after barrier beach formation.

NA_Altho2-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altho2-4 For a discussion regarding potential impacts to water quality, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. As raised by the commenter, many species aside from salmon may be affected by the dynamics of lagoon formation and breaching within the Russian River. Draft EIR Section 4.5.2 describes the various aquatic species and habitat within the project area. Draft EIR Section 4.5, Fisheries, specifically outlines the benefits to salmonids of lagoon rearing and Impacts 4.5-1 and 4.5-2 specifically address the likely effects of the proposed management action on salmonids. Water quality impacts relating to the proposed management of the Estuary and lagoon are addressed in detail in Draft EIR Section 4.3, Water Quality. As described in the analysis discussion in Impact 4.5.2, impacts potentially resulting from the proposed management of the Estuary relating to water quality conditions becoming stressful for special status and other native fish species inhabiting the Estuary are considered less than significant.

NA_Altho2-5 For additional discussion regarding potential impacts to water quality, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Altho2-6 Please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**. The purpose of a Draft EIR is to disclose potential direct and secondary environmental impacts associated with a proposed project. While

holistic management of a watershed is important for resource planning and management, the Draft EIR does not propose watershed management techniques or studies; rather it is intended to function as a disclosure document for decision makers to consider the impacts related implementation of the Estuary Management Project.

NA_Altho2-7 With respect to recreational and socioeconomic impacts, please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility**, in **Chapter 2, Master Responses**. As discussed in Draft EIR Chapter 3.0, Project Background and Environmental Setting, the Water Agency has ongoing monitoring programs for water quality, fisheries, macroinvertebrates, and pinnipeds. The Water Agency will continue these programs, and this information will be used to update the adaptive management plan as appropriate.

The Water Agency will continue its Estuary water quality monitoring program as required under the Biological Opinion, and will modify that program to gather appropriate water quality information, in consultation with regulatory agencies, as needed. For a discussion related to water quality and subsequent monitoring requirements, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Altho2-8 Commenter's name and address were added to distribution list.

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Nature knows best how to make a river, let's return it in as many ways as we can to its natural flow.

MAGICK ALTMAN
(Name: Please Print)
7602 Huntley St.
(Street Address)
Sebastopol CA 95472
(Town) (Zip Code)

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY
FEB 10 2011

February, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Altma-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Altma-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Altma-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Altma-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Altma-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Altma-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Altma-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Altma-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Altma-9

Sincerely,

(Signature) 2·10·11 (Date)

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Magick Altman, February 10, 2011

NA_Altma-1 Commenter's name and address added to distribution list.

NA_Altma-2 Commenter is identifying individual uses of the Russian River.

NA_Altma-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altma-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to response to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Altma-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to response to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Altma-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Altma-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Altma-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Altma-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 1 0 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Russian River Art Gallery

16200 First Street
on the Plaza
Guerneville, CA 95446

707-869-9099

Open
Winter/Spring:
Thurs-Mon: 11a-5p

Summer/Fall:
Mon-Sat: 10a-6p
Sundays: 11a-5p

www.russianriverartgallery.com

NO to a closed estuary and low flow on the Russian River! BAD science, BAD algae and pollution. BAD for fish, people towns. where do these people come from?

to SCWA
Jessica Martini-Lamb
404 aviation Blvd
Santa Rosa
95403

NA_Anonymous-1

NA_Anonymous-2

Anonymous, February 10, 2011

NA_Anony-1 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Anony-2 For a discussion regarding water quality relative to pollutant levels, health of fish and humans, and invasive plants, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Evelyn Elizabeth Ashley
(Name: Please Print)

P.O. Box 14
(Street Address)

Kaaawa HI 96730
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Ashle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Ashle-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ashle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ashle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ashle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ashle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ashle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ashle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ashle-9

Sincerely,

Elizabeth Ashley 1/13/11
(Signature) (Date)

Evelyn Elizabeth Ashley, February 13, 2011

NA_Ashle-1 Commenter's name and address added to distribution list.

NA_Ashle-2 Commenter is identifying individual uses of the Russian River.

NA_Ashle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ashle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to response to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ashle-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**.

NA_Ashle-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ashle-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ashle-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ashle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 3 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Amanda Atkinson
(Name: Please Print)
20145 Beech Ave
(Street Address)
Monte Rio 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_AtkinA-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and my two young boys are in the river all summer long! NA_AtkinA-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_AtkinA-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_AtkinA-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_AtkinA-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_AtkinA-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_AtkinA-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_AtkinA-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.28-2011 years. This is unacceptable. NA_AtkinA-9

Sincerely,

Amanda Atkinson 1-28-2011
(Signature) (Date)

Amanda Atkinson, January 28, 2011

NA_AtkinA-1 Commenter's name and address added to distribution list.

NA_AtkinA-2 Commenter is identifying individual uses of the Russian River.

NA_AtkinA-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinA-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinA-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_AtkinA-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_AtkinA-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinA-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_AtkinA-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Megan Steer

From: doreen atkinson [datkinson2000@yahoo.com]
Sent: Saturday, February 12, 2011 9:36 AM
To: fishflow@scwa.ca.gov; Jessica Martini.Lamb@scwa.ca.gov; estuaryproject
Cc: Estuary Project Group; Valerie Brown 1st Dist Sup.; David Rabbitt 2nd Dist. Supe; Shirlee Zane 3rd Dist. Sup.; Mike McGuire 4th Dist. Sup.; Efren Carrillo 5th Dist. Sup.; Amanda Atkinson; John Bauer; Barbara DeCarly; Elise; Rue Furch; Tia G; Gary Getchell; peter or vicki halstead; Laura Harris; Johanna Lynch; Suzanne Marr; Betsy McConnell; Linda Schmidt; Elise Sokolay; Matt St. John; Suzi; Todd Thompson; John Uniack; Pam Vale; Vesta; Christy Cowley; Carol Cowley; Patty
Subject: Re:Addendum Comment Submission--Fish Flow Project/extended Deadline 2/14/11

2/12/11

Dear Ms Martini-Lamb: RE: Addendum Comment Submission
Opposition to LOW FLOW

I would like to add a few more questions to my previously sent e-mail dated November 9, 2010, copy below. NA_AtkinD-1

6. **Does the Low Flow Project (Fish Flow) EIR include qualitative and statistical assessment in whether the project will violate water quality in the upper, middle and lower portions of the Russian River? In other words, does the EIR look at the Russian River as a whole?** NA_AtkinD-2

7. Is the Biological Opinion (BO) which was submitted by the National Marine Fisheries Service (NMFS) a mandate that must be enforced or is it an opinion that has been submitted to the Sonoma County Water Agency (SCWA) to either embrace or reject? NA_AtkinD-3

8. Why isn't SCWA waiting on enforcing a permanent Low Flow until the North Coast Water Quality Control Boards completes it's comprehensive monitoring program, scheduled to begin in Spring 2011? NA_AtkinD-4

9. Does the Counties contractual selling of water to various communities and agricultural needs have anything to do with the seemingly rush to a permanent Low Flow on the Russian River? Is this more about the selling of water rather then the saving of fish? NA_AtkinD-5

I'll end here and hope that your agency will taken into consideration my concerns for our beautiful Russian River and that those that haven't yet submitted a comment via e-mail do so by this Monday 5:00PM.

Sincerely,
Doreen Atkinson
18962 Upper Terrace
Monte Rio, CA 95462

--- Date: Tuesday, November 9, 2010, 2:23 PM

The following letter to be mailed to Ms Martini-Lamb, SCWA in **opposition** to "Low Flow".

Jessica Martini-Lamb
SCWA/ Fishflow@scwa.ca.gov
404 Aviation Blvd.
Santa Rosa, CA 95403

Dear Ms Martini-Lamb: Re: Comment Submission—Fish Flow Project

I'm responding with comment to the Sonoma County Water Agency regarding "low flow" during the summer months, specifically the lower portion of the Russian River. A public seminar, a requirement by law in order for the SCWA to petition from the State Water Board the permanently lowering of water flows from 125 cf to 70 cf during the summer months, was just conducted in Monte Rio on November 5th. There were a lot of colorful hand outs, maps, and charts at various stations with each station staffed by water agency employees, all of whom suggested filling out "comment cards" and returning them by the November 15th deadline. The project, once referred to as "Low Flow", has now been renamed to "Fish Habitat Flows and Water Rights Project" or "Fish Flow" for short. I was told it was easier for people to remember, but I assume it was changed to shed a more positive spin within the general public. In a very simplistic explanation, the reason for the "lower flow" is to save the salmon, or at least that's what it's being billed as but at what cost to others?

It was very obvious that this past summer's water flow was much better than last year's due to the wet winter and late spring. From what I've read, the average flow this past summer at the Hacienda Bridge was 263 cfs as compared to 70 cfs in the summer of 2009 when algae blooms were at the highest levels I've ever observed. I've lived along the Russian River in Monte Rio for over 60 years and have witnessed many changes in the River. In the 1950's and 1960's the River at Monte Rio's public beach was at least 12 feet deep in the middle of the channel between the beach and the Highland Dell Hotel. There were two docks that you could dive from and a rope strung from one dock to the other to warn of deep waters. Now, that same public beach is called the "Monte Rio Kiddy Beach" because of its shallowness—no docks, no ropes, but lots of moss and algae! People can be seen ankle, knee or waist deep in places that once was over one's head! This change is mainly due in part to the buildup of silt from various negative conditions going on up stream, (i.e. gravel mining, bottom release from dams, agriculture, etc.). Certainly the River wasn't completely healthy back in the 50's. It was muddy, smelled of dead eels, and void of any wildlife as compared to that of today. Mistakes in the past have been made. One that I recently learned of was when the Department of Fish and Game began a "trash" fish eradication program in 1954 from the East Fork above Ukiah down to Healdsburg. Rotenone poison was sprayed and suffocated the fish by damaging their gills. According to an article dated November 12, 1956 in the Ukiah Daily Journal this was an experiment done to kill off all the undesirable non-game fish but nearly all the fish in the River were killed! With the completion of the Coyote Dam in 1959, (and by various accounts the beginning of the end of Salmon in the Russian River) the State asked Sonoma and Mendocino counties to specify what water flows they wanted and according to the Ukiah Daily Journals article, "Water Releases From Coyote Dam for Fish Asked by State", the answer, "**Guerneville needed 125 cfs to maintain its fishery**. " Came the late 1970's, 80's and 90's when osprey, ducks, turtles, otters, among others seem to have proliferated to the enjoyment of many. But, in the past few years, when kayaking from Guerneville to Monte Rio one is forced to get out and walk through blooms of algae, thick moss and an invasive plant called Ludwigia in various places because the River has become so shallow.

So, my questions:

1. **How will the "low flow" affect the temperature of the River?**

2. Will "low flow" contribute to more algae blooms?

3. Will the River be in danger of drying up due to the buildup of sediment and "Low Flow"?

4. What about the other aquatic animals and wildlife upstream from the Estuary, what affects will "low flow" have on them?

5. The Russian River has had a rich history of tourism during the summer months. What will be the affect on businesses and water recreation use if and when beaches are closed because of algae blooms and high bacteria counts?

The Biological Opinion does not address these questions nor does the SCWA which has remained focused on "low flows" benefitting the salmon. While SCWA continues to meet the needs of its water contractors, what environmental considerations has the Russian River as a whole been given in return? There is no simple answer, water is a valuable commodity and will be getting even more valuable in the future—what will our priorities be? Until these questions can be answered I am STRONGLY OPPOSED to the "low flow" objective of the Sonoma County Water Agency. Mistakes have been made in the past, let's learn from them and move in a more responsible manner towards saving our most valuable resource in Sonoma County, the RUSSIAN RIVER!

Sincerely yours,

Doreen Atkinson
Monte Rio, CA

Doreen Atkinson, February 2, 2011

NA_AtkinD-1 Commenter is adding to comments to the Fish Habitat Flow and Water Rights Project Notice of Preparation, submitted on November 9, 2011. The previously submitted comment letter is included in the record. However it is directly related to the Fish Habitat Flow and Water Rights Project Notice of Preparation. Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinD-2 This comment is directly related to the Fish Habitat Flow and Water Rights Project Notice of Preparation. Please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinD-3 Section 7 of the Endangered Species Act, 16 USC Section 1536(a)(2), requires agencies to consult with NMFS regarding potential impacts to marine and anadromous species[1] under NMFS jurisdiction if they are proposing an "action" that may affect listed species or their designated habitat. Each federal agency is to insure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. If a listed species may be present, the local agency conducts a biological assessment to analyze potential effects of the project on listed species and critical habitat in order to establish and justify a determination of the level of potential effect. The Russian River Biological Opinion concluded that the continued operations of Coyote Valley Dam and Warm Springs Dam by USACE and the Water Agency in a manner similar to recent historic practices, together with the Water Agency's stream channel maintenance activities and Estuary management, are likely to jeopardize and adversely modify critical habitat for endangered coho salmon and threatened steelhead. The Biological Opinion recommends "reasonable and prudent alternatives" (RPAs) to artificial breaching activities to avoid jeopardizing or adversely modifying habitat. The Estuary Management Project is proposed to implement the requirements of the Biological Opinion. By complying with the Biological Opinion, the Water Agency may continue to carry out its water supply, stream channel maintenance, and Estuary management activities without risking potential criminal and civil liability under the federal Endangered Species Act for the incidental "take" of listed fish species. Moreover, compliance with the Biological Opinion requirements is necessary for the Water Agency to obtain the permits and approvals from other agencies necessary for the Water Agency to carry out its activities. Thus as a practical matter the Water Agency does not have an opportunity to "reject" the directives of the Biological Opinion and still

[1] United States Fish and Wildlife Services is the federal agency for fresh-water and wildlife species.

continue its operations. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_AtkinD-4 Under the Biological Opinion, the Water Agency is required to modify current estuary management activities. The Water Agency will review and incorporate information generated by the Regional Water Quality Control Board's monitoring program as it becomes available within the context of the adaptive management plan under the Estuary Management Project. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_AtkinD-5 Commenter questions whether the project is proposed in order to sustain or meet water contracts. The Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific project objectives of driving the proposed Estuary Management Project are established in Draft EIR Chapter 2.0, Project Description, and include providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimization of flood hazard.

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 15 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

BARBARA JEAN AVERY
(Name: Please Print)
16235 RIO NIDO ROAD
(Street Address)
GUERNEVILLE 95446
(Town) (Zip Code)

February, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Avery-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and bringing friends & family for their enjoyment NA_Avery-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Avery-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Avery-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Avery-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Avery-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Avery-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Avery-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Avery-9

Sincerely,

Barbara Jean Avery 2.14.11
(Signature) (Date)

ADDITIONAL COMMENTS & QUESTIONS —

WITH CONCERN FOR SURVIVAL ENDANGERED FISH, WHY IS GRAVEL MINING ALLOWED TO CONTINUE ON THE RUSSIAN RIVER? NA_Avery-10

ENGINEERS SUSPECT CLOSING THE MOUTH OF THE RIVER WILL NOT BE SUCCESSFUL, WITH THIS IN MIND WHY DO YOU THINK IT WILL BE SUCCESSFUL? NA_Avery-11

WITH THE DOWNTURN IN THE ECONOMY, WHAT YOU PROPOSE WILL HARM LOCAL BUSINESSES? HOW DO YOU PROPOSE TO MAKE UP LOSS ~~TAX~~ REVENUES WITH BUSINESSES THAT HAVE HAD TO CLOSE DUE TO TOURIST REDUCTION? NA_Avery-12

PLEASE ANSWER THESE QUESTIONS

THANK YOU.

Barbara Avery, February 14, 2011

NA_Avery-1 Commenter's name and address added to distribution list.

NA_Avery-2 Commenter is identifying individual uses of the Russian River.

NA_Avery-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Avery-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Avery-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Avery-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Avery-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Avery-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Avery-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Avery-10 Gravel mining is authorized for certain areas along the river through specific federal, state and local permitting. The Water Agency is not a regulatory agency and has no authority over or jurisdiction to regulate gravel mining and it is beyond the Water Agency's jurisdiction. The proposed Estuary Management Project does not include gravel mining operations, nor does it create a need for gravel mining. As disclosed in Draft EIR Chapter 5.0, Cumulative Analysis, although the mining operations governed by the Aggregate Resources Mining Plan are located within the Russian River Watershed, the Estuary Management

Project would not contribute to erosion/sedimentation, channel incision, or resource extraction impacts generally associated with mining operations, and therefore would not be cumulatively considerable when implemented in conjunction with gravel mining operations. The Estuary Management Project is intended to enhance fisheries habitat; it does not involve any mineral or aggregate mining. Therefore, the Estuary Management Project's contribution to these types of impacts would be less than cumulatively considerable.

NA_Avery-11 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**.

NA_Avery-12 For discussion regarding CEQA requirements relevant to socioeconomic impacts, please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane. Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Mr. + Mrs. Daniel L. Banchero
(Name: Please Print)

150 Madrone Ave.
(Street Address)

San Francisco CA 94127-1318
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Banch-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and the love of a beautiful place on the river which has been enjoyed by our family for 50 years. NA_Banch-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Banch-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Banch-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Banch-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Banch-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Banch-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Banch-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Banch-9

Sincerely,

(Signature) 1-12-11 (Date)

Mr. & Mrs. Daniel Banchero, February 12, 2011

NA_Banch-1 Commenter's name and address added to distribution list.

NA_Banch-2 Commenter is identifying individual uses of the Russian River.

NA_Banch-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Banch-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Banch-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Banch-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Banch-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Banch-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Banch-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Megan Steer

From: Philip J.Barlow [pjbarlow@sonic.net]
Sent: Sunday, February 13, 2011 11:32 PM
To: estuaryproject
Subject: DEIR Russian River Estuary Management plan

Attachments: Russian River mouth 3Feb'111.JPG

Russian River mouth 3Feb'111.J...

Dear Ms.Martini-Lamb, DEIR - - Russian R. Estuary M. Project

My understanding is that the recently completed biological opinion on the Russian River requires that the " Fish Habitat Flows and Water Rights Project ", together with the abovementioned Estuary Management project are reviewed together. Will this be done.? NA_Barlo-1

As to the proposed channel to be cut across the bar to relieve high water levels - - has any consideration been given to the idea of making a
spillway across the existing railroad bedding south of the concrete jetty
? This bedding is occasionally exposed in big storms & although probably capped to provide rail tie stabilization, it's most likely compacted rocks
(blasted from the east face of Goat Rock). If, in a proscribed area,
whatever necessary rubble is removed down to the agreed outflow level, remaining rubble still in the beach will maintain that level, preventing outflow from cutting a deeper channel. This would at least remove an awkward variable by establishing a constant outflow level - - a valued constant as the months and years go by and the project's effectiveness is evaluated. Even when high seas closes a surface channel, the river could at least overflow this area to deliver river water onto uncompacted beach sand, allowing filtration. NA_Barlo-2

My understanding is that there is no clear consensus as to why the Russian River estuary (unlike some others -eg. the Gualala River) does not enjoy the ability to lose water directly into the ocean by way of filtration through the sand bar when the mouth is closed. Some suggest blockage by the rail bed below the beach surface : others refer to that bottom section of the river having developed a clay pan.

Either way, a channel crossing above the old rail bedding would trump both of the primary arguments as to the reason why this river doesn't lose water through a closed beach. Has a channel cut in this location been considered ?

I look forward to your answering this question.
Thank you.
Philip Barlow

The message is ready to be sent with the following file or link attachments:

Russian River mouth 3Feb'11.JPG

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Philip Barlow, February 13, 2011

NA_Barlo-1 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_Barlo-2 The scenario described by the commenter is a variation of the Jetty Removal Alternative identified and evaluated in Draft EIR Chapter 6.0, Alternatives Analysis. Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

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Sandie Benz-Williams
(Name: Please Print)

Full time address: 6240 Empire Grade. Santa Cruz, CA 95060

Summer address:
11057 Sunset Avenue
(Street Address)

Forestville CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_BenzW-1

I utilize the Russian River in the following way(s): property owner, ~~business owner,~~ recreationist and ~~/ or tourist,~~ for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and our family summer home for the past 73 years. NA_BenzW-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_BenzW-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_BenzW-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_BenzW-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_BenzW-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_BenzW-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_BenzW-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_BenzW-9

Sincerely,

(Signature) 1/13/2011 (Date)

Sandie Benz-Williams, January 13, 2011

NA_BenzW-1 Commenter's name and address added to distribution list.

NA_BenzW-2 Commenter is identifying individual uses of the Russian River.

NA_BenzW-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BenzW-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BenzW-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_BenzW-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_BenzW-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BenzW-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_BenzW-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Bette

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Brad Bettencourt
(Name: Please Print)
P.O. Box 1927
(Street Address)
Tracy CA 95378
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Bette-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Bette-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Bette-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Bette-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Bette-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Bette-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Bette-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Bette-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Bette-9

Sincerely,

Brad Bettencourt 1-13-2011
(Signature) (Date)

Brad Bettencourt, January 13, 2011

NA_Bette-1 Commenter's name and address added to distribution list.

NA_Bette-2 Commenter is identifying individual uses of the Russian River.

NA_Bette-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bette-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bette-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Bette-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Bette-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bette-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Bette-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Karen Birkhofer
(Name: Please Print)
16376 Melody Ln
(Street Address)
Guerneville, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Birkh-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Birkh-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Birkh-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Birkh-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Birkh-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Birkh-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Birkh-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Birkh-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Birkh-9

Sincerely,

Karen Birkhofer 1-19-11
(Signature) (Date)

Karen Birkhofer, January 19, 2011

NA_Birkh-1 Commenter's name and address added to distribution list.

NA_Birkh-2 Commenter is identifying individual uses of the Russian River.

NA_Birkh-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Birkh-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Birkh-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Birkh-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Birkh-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Birkh-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Birkh-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Donna J. Bley
(Name: Please Print)

1651 Norte Way
(Street Address)

Santa Rosa 95404
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Bley-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Bley-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Bley-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Bley-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Bley-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Bley-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Bley-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Bley-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Bley-9

Sincerely,

Donna J Bley 1/13/2011
(Signature) (Date)

Donna Bley, January 13, 2011

NA_Bley-1 Commenter's name and address added to distribution list.

NA_Bley-2 Commenter is identifying individual uses of the Russian River.

NA_Bley-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bley-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bley-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Bley-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Bley-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Bley-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Bley-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Nichae Blume
(Name: Please Print)

P.O. Box 47
(Street Address)

Guerneville, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Blume-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Blume-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Blume-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Blume-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Blume-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Blume-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Blume-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Blume-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Blume-9

Sincerely,

Nichae Blume 1-12-2011
(Signature) (Date)

Nichae Blume, January 12, 2011

NA_Blume-1 Commenter's name and address added to distribution list.

NA_Blume-2 Commenter is identifying individual uses of the Russian River.

NA_Blume-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Blume-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Blume-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Blume-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Blume-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Blume-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Blume-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Boddu

CHRIS BODDUM
(Name: Please Print)

6051 MONROE AVE.
(Street Address)

OAKLAND, CAL. 94618
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Boddu-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Boddu-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Boddu-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Boddu-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Boddu-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Boddu-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Boddu-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Boddu-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Boddu-9

Sincerely,

C Boddum 2-9-11
(Signature) (Date)

Chris Boddum, February 9, 2011

NA_Boddo-1 Commenter's name and address added to distribution list.

NA_Boddo-2 Commenter is identifying individual uses of the Russian River.

NA_Boddo-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Boddo-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Boddo-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Boddo-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Boddo-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Boddo-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Boddo-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_BoyleK

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Karen Boyle
(Name: Please Print)
182 Westbrook
(Street Address)
Daly City CA 94015
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_BoyleK-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and relaxing. NA_BoyleK-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_BoyleK-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_BoyleK-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_BoyleK-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_BoyleK-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_BoyleK-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_BoyleK-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_BoyleK-9

Sincerely,

Karen Boyle 1/13/11
(Signature) (Date)

Karen Boyle, January 13, 2011

NA_BoyleK-1 Commenter's name and address added to distribution list.

NA_BoyleK-2 Commenter is identifying individual uses of the Russian River.

NA_BoyleK-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleK-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleK-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_BoyleK-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_BoyleK-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleK-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_BoyleK-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Marc Boyle
(Name: Please Print)
9051 Middle Terrace
(Street Address)
Monte Rio, CA
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_BoyleM-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, ~~and~~ FOR 53 YEARS. NA_BoyleM-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_BoyleM-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_BoyleM-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_BoyleM-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_BoyleM-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_BoyleM-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_BoyleM-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_BoyleM-9

Sincerely,

(Signature) 1-19-11 (Date)

Marg Boyle, January 14, 2011

NA_BoyleM-1 Commenter's name and address added to distribution list.

NA_BoyleM-2 Commenter is identifying individual uses of the Russian River.

NA_BoyleM-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleM-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleM-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_BoyleM-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_BoyleM-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_BoyleM-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_BoyleM-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Brand

PATRICIA BRANDT
(Name: Please Print)

1621 FURLONG RD
(Street Address)

SEBASTOPOL CA 95472
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Brand-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Brand-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Brand-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Brand-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Brand-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Brand-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Brand-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Brand-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Brand-9

Sincerely,

Patricia A Brandt 1-16-2011
(Signature) (Date)

Patricia Brandt, January 16, 2011

NA_Brand-1 Commenter's name and address added to distribution list.

NA_Brand-2 Commenter is identifying individual uses of the Russian River.

NA_Brand-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Brand-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Brand-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Brand-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Brand-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Brand-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Brand-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

WALTER BRUNICK
(Name: Please Print)

1928 DIAMOND CT.
(Street Address)

SANTA ROSA 95404
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Bruni-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Bruni-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Bruni-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Bruni-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Bruni-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Bruni-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Bruni-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Bruni-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Bruni-9

Sincerely,

(Signature) 1/12/11 (Date)

Walter Brunick, January 12, 2011

NA_Bruni-1 Commenter's name and address added to distribution list.

NA_Bruni-2 Commenter is identifying individual uses of the Russian River.

NA_Bruni-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bruni-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bruni-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Bruni-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Bruni-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Bruni-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Bruni-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Burge

From: newmanfoto [mailto:newmanfoto@yahoo.com]
Sent: Fri 2/11/2011 4:19 PM
To: estuaryproject
Cc: Katie Blank
Subject: MERMAID///// EIR letter/Deadline Feb. 14th

to:Estuary project ESA
1425 N.McDowell Blvd.
Suite 200
Petaluma ,Calif. 94954

And

to: Jessica Martini Lamb
Sonoma Coast Water Agency
404 Aviation blvd.
Santa Rosa, Calif. 95403

To whom it may concern,
Enclosed are my comments ,questions to the board,

#1. Why is there silt a foot deep along the edges of the river at Hacienda Bridge?
#2 With the proposed project of closing the mouth of the river, will the silt no longer be able to be flushed out to sea?
#3 How much silt is normal ? ((looking back 50 to 100yrs.))
#4 Where is the silt documented as being along the Russian River?
#5 Has anyone ever documented all the areas of salt run-off?
#6 Has anyone ever documented why each area with silt run-off has silt run-off?
#7 Are the silt run-off areas able to be inspected?If so who does the inspection? Are these run-offs included in the DEIR?
#8 Is it being considered that silt run-off causes the bottom of the river to come up?
#9 If silt clogs the river,raising up the bottom of the river, Is there a plan t flush and or dredge it out?
#10 How will this silt build-up effect spawning habitat for Steel-head and Coho Salmon and now California King Salmon?

NA_Burge-1

#11 Is ludweigia being considered and its potential worsening as the invasive plant it is. What is your plan to eradicate Ludwiegia ,so to not trap more silt and amongst other things deplete oxygen from the river?
#12 Has Micheal Cohen , (Sonoma State University) who invented the process of Ludwiegia Digesting and his studies on Ludwiegia been considered in your DEIR? If not, Why not?
#13 Are studies done on Ludwiegias absorption of fungacides, herbacides and pesticides being considered? What amouns of any of the above has Ludwiegia been filtering from the Russian River? How do these amounts differ from Ludwiegia in the Northern rivers?
#14 Is Ludwiegia fungicide ,pesticide, and herbicide worse in area's where agriculture run-off is prevalent?
#15 If Ludwiegia is being eradicated ,what will be the method used to eradicate it and why? Will your proposed project block the Ludwiegia from being washed out or flushed out to sea in winter months ? If Ludwiegia is washed out to sea threw the mouth of the Russian River,What happens to the Ludwiegia once it gets washed out to sea?
#16 What are the effects of Luwiegias oxygen absorption?
#17 Is Ludwiegia omitting Nitrogen , Harmful to fish and other aquatic life in living in the Russian River?

NA_Burge-2

#18 Is Ludwiegia growing in the tributaries such as Jenner Creek,Sheephouse Creek, Slaughterhouse Creek, Austin Creek,Willow Creek and Dutch Bill Creek? Will Ludwiegia grow in these creeks as a result of this project? How will this be studied? NA_Burge-2 cont.

#19 Has all River Restoration groups been contacted for their input on the effects of this project?If so which groups and entities?Can you list them?

#20 Did you contact groups such as, Community Clean Water Institute,out of Sebastopol who have monitored the Russian River and it's tributaries for their input on the changes ,if this project at the mouth of the river is implemented?Have you examined and considered all their information? www.communitycleanwaterinstitute.com NA_Burge-3

#21 How is the Russian River going to flush out silt,Ludwiegia , toxins, herbicides, and pesticides with lower flow, less velocity past the dams in place,then threw your proposed estuary (rearing habitat)Will the new estuary trap all the build-up creating a cesspool that will harm or kill fish and other aquatic life? NA_Burge-4

#22 Have the crabs (Dungenous Crabs for one) I'm informed by fisherman, this is their rearing habitat.Has this been studied or considered at the mouth of the Russian River? Will the crab have the ability to get in and out of the mouth of the Russian River?Will the crabs get enough oxygen to survive , with the mouth of the Russian River closed or controlled?What studies have been done on these crabs?By whom were these studies of crab done? NA_Burge-5

#23 Have you contacted local commercial and sport fisherman as to the effects of this project on their fisheries?If so which fisherman? Have you asked any fisherman for historical data? If so which fisherman? NA_Burge-6

#24 What is happening with the recent release of Wild King and Coho salmonoids ,that made it up the Russian River to spawn ,Oct 24th, 2010. Are they being monitored? Who is recording their survival and where they are now? NA_Burge-7

#25 What aquatic life is in the river and it's tributarieseach day of the year? Who determines this?

#26 Are river turtles being studied? NA_Burge-8

#27 Has the gravel mining at Monte Rio Beach and Casini Beach and the effects from their recent gravel mining been taken into regard with the proposed project? NA_Burge-9

#28 What will be done if a major or even minor septic or toxic spill ,gets into the river and the mouth of the river is closed? NA_Burge-10

#29 With this proposed project (low flow) , will we have enough waters to fight fires as they've had to do , with buckets and a helicopter. NA_Burge-11

I appreciate your time reading and answering these question and comments.

Sincerely Vira Burgerman
aka: The California Mermaid (R)
po box 1733
Guerneville, California
95446

Now that's room service! Choose from over 150,000 hotels
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find your fit.

Vira Burgerman, February 11, 2011

NA_Burge-1 Sedimentation and siltation[2] are parameters considered when regulators evaluate whether water quality is impaired. Siltation occurs throughout the Russian River system, including the Lower and Middle Russian River and the area near the Hacienda Bridge, Guerneville. Sedimentation and siltation may be accelerated from natural levels due to land use practices, including agriculture and grazing, construction (grading) or land development, logging, streambank modification, channelization, or destabilization, and riparian vegetation removal, that contribute to excess sediment loads. As discussed in the Draft EIR, Section 4.2, Hydrology and Flooding, Impact 4.2.1, the project does not have an adverse impact on sedimentation and siltation because it is carried out during periods when flows are usually low and very little sediment is being carried in the water.

A Sediment Total Maximum Daily Load (TMDL) Policy completed on November 29, 2004, and adopted by Resolution R1-2004-0087, directed NCRWQCB staff to control sediment pollution by using existing permitting and enforcement tools. The policy's goals are to control sediment waste discharges to impaired water bodies so that the TMDLs are met, sediment water quality objectives are attained, and beneficial uses are no longer adversely affected by sediment. The Sediment TMDL Implementation Policy also directs the NCRWQCB staff to develop: a Work Plan that describes how and when permitting and enforcement tools are to be used; the Guidance Document on Sediment Waste Discharge Control; the Sediment TMDL Implementation Monitoring Strategy; and the Desired Conditions Report.

The documented sediment impairment of rivers in the North Coast Region is evidence that existing programs to control anthropogenic sediment waste discharges have not been able to control the cumulative impacts of sediment waste discharges on such watersheds. A TMDL for sedimentation/siltation is currently under development by NCRQWCB staff (see comment letter S_NCRWQCB). Similarly, the State Water Resources Control Board (SWRCB) has established sediment quality criteria for enclosed bays and estuaries.

As described in Draft EIR Section 4.2, Hydrology and Flooding, page 4.2-15, the lagoon management period generally coincides with the dry-season and, as a result, there is very little sediment input from upstream during this period. From water year 1984 through 2009, during the Lagoon Management Period, the mean daily flow in the Russian River at Guerneville (USGS gage) was approximately 263 cfs, which is less than 6 percent of the mean daily flow value outside of the Lagoon Management Period (3,000 cfs). Because there is a non-linear

[2] Sedimentation is the deposition of suspended solids or particles in water. Siltation is the accumulation and deposition of fine mineral particles (silt) on the beds of streams or lakes. Lower flow velocities result in settling and deposition.

relationship between sediment transport and flow (i.e., a flow of 1,000 cfs carries more than twice the amount of sediment than a flow of 500 cfs), it is expected that less than one percent of the annual sediment yield at Guerneville is transported during the Lagoon Management Period. In most alluvial rivers draining the north coast of California, the vast majority of the annual sediment load is carried by a few, large flood events (e.g., by flows that occur less than 5 percent of the time, on a daily average basis).

On average, little or no sediment would be transported into the Estuary during the lagoon management period. Consequently, the proposed change in the base-level of the water surface would have little or no impact upon the rate of sediment transport through, or deposition within, the Estuary, and the potential impact of the project upon sedimentation would be less than significant.

NA_Burge-2 This comment includes a series of questions regarding the invasive aquatic plant species, *Ludwigia*. Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Burge-3 The Biological Opinion represents over 10 years of collaboration during the consultation process by federal nexus under Section 7 of the Endangered Species Act, involving USACE, Water Agency, NMFS and CDFG. The Section 7 consultation process under the Endangered Species Act formally includes regulatory agencies; however additional outreach to collaborate with the public and local agencies has been conducted over the past fourteen years. Please refer to **Master Response 2.8, Public Review Process**, in **Chapter 2, Master Responses**, for discussion of scoping and public review processes implemented for the Estuary Management Project EIR.

The Community Clean Water Institute, located in Sebastopol, was notified at the release of the Notice of Preparation. The public meeting dates, times, and locations and solicitation for input during the scoping process was provided directly to the organization. Similarly, the organization was notified of the release of the Draft EIR and provided with the date, time, and location of the Public Hearing and contact information and instructions for submitting comments on the Draft EIR. This organization will continue to be included on the distribution list for project related notifications.

The data results prepared by Community Clean Water Institute were reviewed and considered by Water Agency specialists and consultants relative to the data analyzed in the Draft EIR. The Community Clean Water Institute library of data includes results from citizen monitoring efforts in areas proximate to the study area including Jenner Creek, Austin Creek, and the Lower Russian River. There is no data specific to the Estuary. While this information is useful and germane to the project area, the results are from 2004 and more recent and more extensive data is available to the Water Agency to establish baseline conditions as the basis

for analysis. Similarly, the Draft EIR includes an analysis of a broader range of constituents, including salinity, nutrients, pathogens, beyond those presented for dissolved oxygen and temperature in the 2004 Community Clean Water Institute Reports.

NA_Burge-4 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. To address the concern about potential for the Estuary to convert to "a cesspool," the Draft EIR includes a discussion of residence time, or how long the water remains within the Estuary Study Area (Draft EIR Section 4.3, Water Quality, page 4.3-22). In 2009, the Water Agency contracted with Bodega Marine Laboratory (U.C. Davis) to provide a view of circulation, stratification, residence and salinity in the Russian River Estuary over summer and fall months of 2009. Residence time is a function of river flows into the Estuary, discharge at the river mouth, seepage through the barrier beach, and other losses, such as evaporation and groundwater infiltration. Under current conditions, the estimated residence time in the Estuary ranges from approximately one day, during open tidal conditions, to approximately 27 days, under full closure conditions. With artificial breaching under existing conditions, the actual residence time within the Estuary during closure events is the time period between barrier beach formation and the implementation of artificial breaching by the Water Agency. This time period is typically between five and 14 days. The fill rate of the estuary is approximately 0.5 feet per day at a flow of 185 cfs. This closed condition is the time between closure and Water Agency artificial breaching. Implementation of the Estuary Management Project would not alter the rate of inflow into the Estuary, or the fill rate of the Estuary. Under the Estuary Management Plan, creation of the outlet channel to support water elevations of 7 to 9 feet would not alter the duration of fully-closed estuary conditions. Rather, it would establish an outlet channel that would result in "steady-state" conditions within the same approximately timeframe (defined as the continuous outflow condition after the outlet channel is established).

As presented in the Draft EIR Section 4.3, Water Quality (page 4.3-23), based upon the lowest observed flows of 70-85 cfs, and stratified conditions observed during the 2009 closure, residence time for the proposed project is estimated to range between 14 days and 22 days, depending upon the depth of the freshwater layer that is established. This represents an increase in estimated residence time of approximately one week, compared to the typical residence time of between five and 14 days associated with artificial breaching under existing conditions. It should be noted that during the extended closure in October 2009, residence time was extended to the duration of the 29-day closure. During that time period, no nuisance conditions were observed. That is to say, inflow to the estuary would be matched primarily by outflow conveyed by the channel and seepage through the barrier beach. Other natural loses, such as evaporation, would provide additional,

but minor losses. Therefore, establishment of the outlet channel would include flow through the Estuary towards the outlet channel, as opposed to full closure conditions, when output is limited to seepage through the barrier beach (Draft EIR Section 4.3 Water Quality, page 4.3-22 and -23). For additional information regarding fish and wildlife, refer to Draft EIR Section 4.5, Fisheries.

NA_Burge-5 Dungeness crab, macro-invertebrates, and other marine species and their habitat are considered in the Draft EIR in Section 4.5, Fisheries. The commenter is correct that the Estuary is a nursery for juvenile Dungeness crab. Historical data is included in the Water Agency's annual Biological Monitoring Reports. The proposed project would manage the Estuary so that the naturally formed barrier beach persists for a longer duration during the Lagoon Management Period to either enable a full transition from tidally influenced marine habitat to productive freshwater estuarine lagoon habitat, or maintained stratified conditions with increased stable freshwater habitat in the upper portion of the water column. The Water Agency has surveyed macro-invertebrates in the Estuary annually since 2004 (SCWA, 2010a; SCWA, unpublished data). Although breaching permits do not require this monitoring, the purpose of the surveys is to determine the relative abundance and distribution of macro-invertebrates in the Estuary. Refer to Draft EIR Section 4.5, Fisheries, Impact 4.5.3 beginning on page 4.5-25, for discussion regarding local effects on distribution of marine species within the Estuary during the lagoon management period due to prolonged closure and conversion to freshwater lagoon conditions.

NA_Burge-6 As part of the Draft EIR, no local fishermen were directly contacted for historical data. The analysis relies on published available data including annual report prepared by Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary*, 1996 through 2000, and the Russian River Biological Opinion. Draft EIR Section 4.5, Fisheries, includes an analysis of potential impacts to fish species besides protected salmonids, and found that localized effects from the Estuary Management Plan to fish managed under the Coastal Pelagic, and Pacific Groundfish FMPs, as well as other marine fish species and macroinvertebrates that use portions of the Estuary are unlikely to represent a substantial adverse affect and impacts are considered less than significant.

NA_Burge-7 There are many species in the Russian River which are studied by various resource agencies, including NOAA Fisheries (fisheries), US Fish and Wildlife Service (terrestrial species) California Department of Fish and Game (aquatic and terrestrial State species of concern), and the Water Agency. The Draft EIR focuses on sensitive species in the potentially affected area in the Estuary Study Area and maximum backwater area. Monitoring is one way to inventory the types, populations, location, and health of species.

Draft EIR Section 4.5, Fisheries, includes a description of the common and special status aquatic species found in the Estuary. The Estuary provides habitat for a variety of fish species including salmonids and other important recreational fish species such as American shad and smallmouth bass. In terms of conservation, much attention is given to three Endangered Species Act-listed salmonid species that are known to occur in the Russian River watershed. These are Central California Coast steelhead (*Oncorhynchus mykiss*), California Coastal Chinook salmon (*O. tshawytscha*), and Central California Coast coho salmon (*O. kisutch*; NMFS, 2010). The Estuary is important for adult and juvenile passage for the three Endangered Species Act-listed salmonids (NMFS, 2008). The Water Agency conducts annual biological monitoring within the lower Russian River. Fish, macroinvertebrate, and plankton monitoring evaluates the distribution and abundance of aquatic species in the Russian River Estuary during late spring through early fall. The Water Agency is currently conducting outmigration monitoring on salmonid species, including coho salmon.

NA_Burge-8 This response assumes that the commenter is referring to California species of concern, western pond turtle (*Actinemys marmorata)*, the federally threatened Loggerhead turtle (*Caretta caretta)*, and federally threatened Green turtle (*Chelonia mydas)*, which are turtles with ranges potentially extending into the Estuary Study Area. Draft EIR Table 4.4-3 summarizes the special-status species with potential to occur in the Estuary Study Area. As disclosed in the Draft EIR (page 4.4-46) western pond turtle is known to occur in multiple locations within the Estuary Study Area.

NA_Burge-9 Gravel mining is authorized for certain areas along the river through specific federal, state and local permitting. The Water Agency is not a regulatory agency and has no authority over or jurisdiction to regulate gravel mining and is beyond the Water Agency's jurisdiction. The proposed Estuary Management Project does not include gravel mining operations, nor does it create a need for gravel mining. In the event gravel mining is occurring at Monte Rio Beach and Casini Beach, this response is intended to clarify these are private operations and are not authorized or carried out by the Water Agency. As disclosed in Draft EIR Chapter 5.0, Cumulative Analysis, although the mining operations governed by the Aggregate Resources Mining Plan are located within the Russian River Watershed, the Estuary Management Project would not contribute to erosion/sedimentation, channel incision, or resource extraction impacts generally associated with mining operations, and therefore would not be cumulatively considerable when implemented in conjunction with gravel mining operations. The Estuary Management Project is intended to enhance fisheries habitat; it does not involve any mineral or aggregate mining. Therefore, the Estuary Management Project's contribution to these types of impacts would be less than cumulatively considerable. Since this comment does not affect the environmental analysis in the Draft EIR, no changes in the Final EIR are required.

NA_Burge-10 As noted in Draft EIR Chapter 2.0, Project Description, page 2-22, certain conditions during the Lagoon Management Period, such as water quality degradation[3] or imminent flooding to properties and structures adjacent to the Estuary, could require a change in management, and may result in the Water Agency breaching the barrier beach during the Lagoon Management Period. Therefore, in the unlikely event that septic or toxic releases by a third party into the Estuary or Russian River result in nuisance conditions, the Water Agency would consult with NMFS and CDFG regarding artificial breaching during the Lagoon Management Period. For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Burge-11 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. The Estuary Management Project does not propose lower flows, and would not affect river flow conditions, or the potential to use the river channel as a water supply for aerial fire suppression.

[3] Water Quality parameters are defined in the North Coast Regional Water Quality Control Board's Basin Plan and would be further defined in consultation with NMFS and RWQCB.

Comment Letter NA_Burke

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

James T. Burke
(Name: Please Print)

617-Monterey Boulevard
(Street Address)

San Francisco, CA., 94127-2346
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Burke-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and peace of mind! NA_Burke-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Burke-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Burke-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Burke-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Burke-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Burke-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Burke-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Burke-9

Sincerely,

(Signature) 01/11/11 (Date)

James Burke, January 11, 2011

NA_Burke-1 Commenter's name and address added to distribution list.

NA_Burke-2 Commenter is identifying individual uses of the Russian River.

NA_Burke-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Burke-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Burke-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Burke-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Burke-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Burke-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Burke-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

February 14, 2011

Grant Davis, General Manager
Sonoma County Water Agency

COMMENTS - ESTUARY DEIR

Please place these comments in the administrative record for the Sonoma County Water Agency's Draft Environmental Impact Report for the "Russian River Estuary Management Project."

Coho Salmon

The DEIR is required as a result of the Biological Opinion on the Russian River 2008. The B.O. describes the scope of the problems facing the protected species at risk of extinction.

"Coho salmon are at very high risk of extinction." (Biological Opinion page 76). Preliminary data from adult return counts and estimations in 2007/08 indicates a **severe decline** in returning adults across the range of coho salmon on the coast of California and Oregon compared to the same cohort in 2004/05. (Biological Opinion pg 87, emphasis added).

The populations in this ESU suffer from extremely low contemporary abundance compared to historical abundance, widespread local extinctions, clear downward trends in abundance, extensive habitat degradation, and associated decreases in carrying capacity (Good *et al*. 2005). (BO Pg. 87).

The Russian River population alone was once the largest and most dominant source population in the ESU. The fact that it is now on
the verge of extirpation suggests not only a high risk of extinction for this population, but for other nearby populations in this ESU. The historical role of the Russian River population highlights the importance of this population to the survival and recovery of the species. (B.O. page 90)

NA_Burr-1

Scope of DEIR is Improper

The Russian River estuary is inextricably linked to the activities that occur upstream. The scope of the DEIR, therefore necessarily includes legal and illegal diversions, impoundments, and dam operations upstream. The DEIR fails, however, to adequately address the upstream factors. The Biological Opinion itself describes the interconnectedness of the dam operations on the estuary. "Proposed project operations will likely have significant effects on the PCE of estuarine critical habitat for each salmonid species because flow management at WSD [Warm Springs Dam] and CVD [Coyote Valley Dam] will create high inflows to the estuary during the low flow season and the sandbar breaching activities at the mouth will significantly affect water quality in the lowermost segment of the river. (B.O.)

NA_Burr-2

Listed salmonids are adversely affected by operations for flood control at the two project dams, by project flow releases for water supply, by the management of estuary water levels, by the project related hatchery operations, and by channel maintenance activities in both the mainstem and Russian River tributaries‘’ (B.O.. page 11)

Proper evaluation of dam operations is necessary in the DEIR on estuary management, yet no meaningful analysis of dam operations is included.

NA_Burr-2 cont.

Water Budget

A credible water budget is necessary for proper estuarian management for the benefit of the Chinook, steelhead, and coho fish species. A credible water budget must include estimates of freshwater inputs and outputs, to the River including activities that affect freshwater supply in the tributaries. This variable, though critical to understanding and maintaining freshwater to the lower river, is absent in the DEIR.

One example of where the lead agency improperly left out important stream flow information is the reliance on inferior modeling. “ Habitat modeling to address instream flow needs for fishes is often accomplished using the Instream Flow Incremental Methodology (IFIM) (Bovee 1982). In a letter dated January 2, 2001 to the Corps, NMFS specifically recommended that the IFIM be employed to address habitat flow relations in stream segments affected by project water releases. However, SCWA declined to use this highly quantitative method for addressing this issue. “(B.O. page 184).

In addition, the DEIR makes no attempt to address the take of freshwater from the system at different river segments in critical tributaries, or major river reaches. This is a fatal flaw. “Water diversions needed for agriculture have altered flow regimes in the Russian River and its tributaries. (B.O. page 158). Although agriculture demands are substantial and coincide with critical times for recovery of the listed salmonids, these demands were not quantified nor evaluated for their timing, location, or volume with respect to increased legal and unauthorized diversions during low flow periods.

In the absence of a credible water budget analysis, the conclusions in the DEIR, are not based upon substantial evidence.

NA_Burr-3

Project Description

The Project Description fails to adequately describe the affects and importance of upstream conditions. Although the Biological Opinion repeatedly links the estuary problems with dam operations, the DEIR fails to describe and address these significant parts of the Estuary Project.

“The combination of artificially high flows entering the estuary during summer months and the proposed plan for breaching the estuary mouth is likely to result in the loss of productive freshwater rearing habitat at the mouth of the Russian River. (B.O)

As the Biological Opinion states, “[t]he Project includes operation of two dams and appurtenant

NA_Burr-4

facilities in the Russian River watershed." (B.O.) NA_Burr-4 cont.

Conclusion

"[T]he central location of the Russian River in the range of CCC coho and that the watershed represents a third of the ESU by area, the survival and recovery of CCC coho salmon will likely depend on a substantial positive trend in the growth rate and abundance of coho salmon in the Russian River. (B.O. page 16).

The DEIR is inadequate because it fails to properly evaluate the dam releases, fails to properly describe the project, and fails to include a credible estimate of all freshwater inputs and diversions. NA_Burr-5

Thank you for the opportunity to comment on this important project. I reserve the right to add to these comments when data requested from the lead agency in November 2010 is received and reviewed.

Sincerely,

Kimberly Burr

Kimberly Burr
Post Office Box 1246
Forestville, CA 95436

Kimberly Burr, February 14, 2011

NA_Burr-1 Comment reiterates the language in the Russian River Biological Opinion emphasizing the importance of coho salmon and the challenges affecting successful fisheries populations in the Russian River. No changes in the Final EIR are required.

NA_Burr-2 See **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project would not affect dam operations or flow conditions in the Russian River; analysis of these conditions are beyond the scope of this EIR.

NA_Burr-3 See **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project would not alter flows or diversions, therefore Instream Flow Incremental Methodology to model streamflow modeling is not relevant to the Estuary Management Project and therefore not included.

NA_Burr-4 See **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project would not affect dam operations or flow conditions in the Russian River; analysis of these conditions are beyond the scope of this EIR.

NA_Burr-5 Refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, and **2.7, CEQA Statues: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**. The Estuary Management Project does not affect dam releases. Draft EIR Chapter 2.0, Project Description, was prepared in accordance with CEQA Guidelines Article 9, Section 15124. The Draft EIR includes information related to historic flow data ("freshwater inputs") and explains that the Estuary Management Project is intended to function over a range of flows.

Draft EIR Chapter 2.0, Project Description, includes information on the timing of closures and subsequent natural and artificial breaching events during the Lagoon Management Period. As noted in **Master Response 2.1, Relationship to Other Biological Opinion Elements**, the Estuary Management Project has been developed to adaptively manage the Estuary under the range of observed flow conditions following barrier beach formation under varying hydrologic year types and conditions. As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting (page 3-3), River flows typically decline rapidly over the five month lagoon management period. Flows in May averaged 767 cfs for the years 1939 to 2009, and averaged 178 cfs in September for the same time period.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 27 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

JAMES CAMPBELL
(Name: Please Print)

10299 SUNSET AVE
(Street Address)

GUERNEVILLE 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Campb-1

I utilize the Russian River in the following way(s): property owner, ~~business owner,~~ recreationist ~~and/or tourist,~~ for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and scientific study. NA_Campb-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Campb-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Campb-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Campb-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Campb-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Campb-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Campb-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Campb-9

Sincerely,

(Signature) 2011-01-22 (Date)

James Campbell, January 22, 2011

NA_Campb-1 Commenter's name and address added to distribution list.

NA_Campb-2 Commenter is identifying individual uses of the Russian River.

NA_Campb-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Campb-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Campb-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Campb-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Campb-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.**

NA_Campb-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Campb-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Charl

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

A. R. CHARLTON
(Name: Please Print)

416 GOLD MINE DRIVE
(Street Address)

SAN FRANCISCO, CA 94131
(Town) (Zip Code)

VACATION HOME - MILLE RIVER

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Charl-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and BOATING. NA_Charl-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Charl-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Charl-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Charl-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Charl-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Charl-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Charl-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Charl-9

Sincerely,

Allen R Charlton January 12 2011
(Signature) (Date)

Allen Charlton, January 19, 2011

NA_Charl-1 Commenter's name and address added to distribution list.

NA_Charl-2 Commenter is identifying individual uses of the Russian River.

NA_Charl-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Charl-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Charl-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Charl-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

John J. Chyle
(Name: Please Print)
10705 Hwy #1
(Street Address)
Jenner, 95450
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Chyle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Chyle-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Chyle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Chyle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Chyle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Chyle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Chyle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Chyle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Chyle-9

Sincerely,

1-12-2011

(Signature) (Date)

John Chyle, January 19, 2011

NA_Chyle-1 Commenter's name and address added to distribution list.

NA_Chyle-2 Commenter is identifying individual uses of the Russian River.

NA_Chyle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Chyle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Chyle-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Chyle-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Chyle-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Chyle-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Chyle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

Rick Coates
(Name: Please Print)
P.O. Box 195
(Street Address)
CAZADERO CA 95421
(Town) (Zip Code)

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Coate-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, ~~fishing~~, swimming, and Kayaking. NA_Coate-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Coate-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Coate-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Coate-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Coate-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Coate-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Coate-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Coate-9

Sincerely,

Rick Coates 1-19-11
(Signature) (Date)

Rick Coates, January 19, 2011

NA_Coate-1 Commenter's name and address added to distribution list.

NA_Coate-2 Commenter is identifying individual uses of the Russian River.

NA_Coate-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Coate-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Coate-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Coate-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Coate-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.**

NA_Coate-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Coate-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Pamela Conley
(Name: Please Print)
59 Silvia Dr.
(Street Address)
Cazadero, CA 95421
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Conle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Bird Watching. NA_Conle-2

I am concerned about the bifurcation (separation) of the Estuary Project ~~from~~ the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Conle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Conle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Conle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Conle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Conle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Conle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Conle-9

Sincerely,

Pamela Conley 16 JAN 2011
(Signature) (Date)

Pamela Conley, January 16, 2011

NA_Conle-1 Commenter's name and address added to distribution list.

NA_Conle-2 Commenter is identifying individual uses of the Russian River.

NA_Conle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Conle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Conle-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Conle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 3 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Edward + Eileen Copeland
(Name: Please Print)

14969 Melody Ave
(Street Address)

Guerneville, Ca 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Copel-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Copel-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Copel-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Copel-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Copel-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Copel-6
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- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Copel-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Copel-9

Sincerely,

Edward R Copeland Eileen Copeland Feb 1, 2011
(Signature) (Date)

Edward & Eileen Copeland, February 1, 2011

NA_Copel-1 Commenter's name and address added to distribution list.

NA_Copel-2 Commenter is identifying individual uses of the Russian River.

NA_Copel-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Copel-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Copel-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Copel-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

From: Vesta Copestakes [vesta@sonic.net]
Sent: Thursday, February 10, 2011 10:14 PM
To: estuaryproject
Cc: Jessica.Martini.Lamb@scwa.ca.gov; governor@governor.ca.gov
Subject: Russian River Estuary Project

Dear Decision-makers,

The Russian River area has provided home for me for many decades. I've watch the river rise and fall with the seasons and known it's waters to go from so polluted no one could swim in it, to watching fish return with cleaner water. I'm proud of what everyone has done to make the river healthier for every living being that depends upon its life-force.

I'm also impressed that government agencies are paying attention to our river down to the most minute detail and statistic. I believe that's what it will take to keep making the river healthy for people, plants, animals and fish. We still have more to do.

Although I applaud the **Biological Opinion** for its intent, I still have concerns that the aspect of the BO that includes the **Russian River Estuary Project at Jenner**, is too focused on lowering river flow to mimic ancient history, believing that will solve problems for our fish. It is early February and Ludwegia blooms are already crowding the Laguna de Santa Rosa to the extent that a morning kayak trip sponsored by the Laguna Foundation had to be canceled because the waterways are choked with this invasive plant. We were hoping winter cold had killed enough plants to clear our path, but not so. This plant is our Canary in the Coal Mine. NA_Copes-1 NA_Copes-2

If I am correct, there are two reasons to lower the flow of the Russian River:

1 - to allow the mouth of the river at Jenner to close and create an fresh-water condition that provides a nursery for young fish.

2 - to keep the estuary from rising high enough to flood adjacent properties.

I'm OK with #1 and not OK with #2. If homes and buildings are too close to the water, they can be moved, raised or demolished. We have been doing this for many years along the flood zone of the Russian River. These property owners should not have more privilege than others along the river. NA_Copes-3

There is no way to return our river to its pre-human influence state. Therefore we must work with what we have - pollution from roads, homes, vineyards, etc. that enter the Russian River all year long. Pollutants need to be diluted with sufficient river flow to keep the water clean for life. At this point, there is no other option. That means monitoring river flow to maintain a level of clean water that sustains life...not just at a few locations, but all along the river from headwaters to sea. NA_Copes-4

There is one condition I would like to see returned to its original state, because it can be. The artificial jetty buried in the sand at Jenner needs to be removed so that river/ocean conditions can return to whatever they will create on their own. Once the expense and disturbance of removing the jetty is accomplished, these two water entities will find a natural balance. Once they do, there will be no more need for heavy machinery at the mouth. NA_Copes-5

I understand that the river flow is not natural. But I refer, again, to a flow that is sufficient to keep the water clean for life. As far as I'm concerned - that's the top priority - keep this river clean for life, and all else will fall into place. NA_Copes-6

It sounds so simple, yet I know it is complicated. But I believe in setting goals, as all these agencies have done. I just want to see the goals include the entire river system - including tributaries, so that this system is taken care of in its entirety, not just pieces and sections. NA_Copes-7

Our Russian River Watershed is a whole body - not just parts. It requires the skills of a General Practitioner to oversee the entire system, not just specialists concentrating on sections. We can tell by algae blooms, Ludwegia and other indicators, that the system is suffering. Please pay attention to all these indicators and monitor this water system to maintain its health. It's not just the fish who will benefit. NA_Copes-8

Thank you for your attention and consideration,
--
Vesta Copestakes, Publisher, etc.
Sonoma County Gazette
Written by Readers - Connecting Sonoma County Communities
http://www.sonomacountygazette.com/
http://sonomacountynurseries.com/
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Forestville, CA 95436
707-887-0253
FAX 707-887-0249
EM: vesta@sonic.net
27,000 copies distributed! The Sonoma County Gazette is FREE for readers seeking Local Community News, Issues, Opinion & Calendars. MAILED to Forestville, Graton, Sebastopol, Occidental, Guerneville, Monte Rio, Villa Grande and Rio Nido, and distributed to 420 NEWSSTAND LOCATIONS from from Petaluma to Cloverdale and Santa Rosa to Bodega Bay, including Healdsburg, Geyserville, Windsor, Santa Rosa, Sebastopol & Graton - the Russian River towns of Forestville, Rio Nido, Guerneville, Monte Rio, Duncans Mills, Cazadero & Jenner - and to Bodega Bay, Bodega, Freestone & Valley Ford - most of Sonoma County! The Gazette is also published on the web at http://www.sonomacountygazette.com/ with our comprehensive on-line Sonoma County Calendar all-month-long: CLICK on ***SCG EXTRA!*** *for new updates* http://www.sonomacountygazette.com/blog/index.html

Vesta Copestakes Publishers, January 18, 2011

NA_Copes-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Copes-2 The Draft EIR considers potential impacts to recreation and water quality in Sections 4.7, Recreation, and 4.3, Water Quality, respectively. Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses** for discussion regarding *Ludwigia*.

NA_Copes-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Copes-4 The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. The Estuary Management Project would not create or contribute to new or more severe sources of pollution; additionally, the Water Agency does not have the authority to control input from other dischargers. Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Copes-5 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a jetty study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Copes-6 For a discussion of Draft EIR analysis of potential water quality impacts associated with the Estuary Management Project, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Copes-7 No response or revision of text is necessary.

NA_Copes-8 The Estuary Management Project is proposed to meet the project objectives of enhancing juvenile salmonid habitat within the Russian River Estuary. For a discussion of Draft EIR analysis of potential water quality impacts associated with the Estuary Management Project, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

SHARON COTTRELL
(Name: Please Print)
19585 CRESCENT AVE
(Street Address)
MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Cottr-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, ~~fishing, swimming,~~ and Kayaking. NA_Cottr-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Cottr-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Cottr-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Cottr-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Cottr-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Cottr-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Cottr-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Cottr-9

Sincerely,

(Signature) 1/18/11 (Date)

mailing address is P.O. Box 973
Sausalito CA 94966
(no mailbox at home)

Sharon Cottrell, January 18, 2011

NA_Cottr-1 Commenter's name and address added to distribution list.

NA_Cottr-2 Commenter is identifying individual uses of the Russian River.

NA_Cottr-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Cottr-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Cottr-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Cottr-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Cottr-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Cottr-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Cottr-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Cough

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

BEVERLY COUGHLIN
(Name: Please Print)

828 El Camino Del Mar
(Street Address)

San Francisco Ca 94121
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Cough-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and family get-togethers. NA_Coug-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Coug-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Coug-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Coug-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Coug-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Coug-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Coug-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Coug-9

Sincerely,

Beverly C. Coughlin 1/15/11
(Signature) (Date)

Russian River address:
15960 Riverlands Rd
Jenner Beach, Ca 95446

Beverly Coughlin, January 15, 2011

NA_Cough-1 Commenter's name and address added to distribution list.

NA_Cough-2 Commenter is identifying individual uses of the Russian River.

NA_Cough-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Cough-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Cough-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Cough-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Curtis Cournale
(Name: Please Print)

18110 Old Monte Rio Rd
(Street Address)

Guerneville, CA 95466
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Courn-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Canoeing! NA_Courn-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Courn-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Courn-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Courn-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Courn-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Courn-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Courn-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Courn-9

Sincerely,

Curt Cournale 1/18/11
(Signature) (Date)

Curtis Cournale, January 18, 2011

NA_Courn-1 Commenter's name and address added to distribution list.

NA_Courn-2 Commenter is identifying individual uses of the Russian River.

NA_Courn-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Courn-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Courn-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Courn-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Courn-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Courn-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Courn-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 3 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Thomas F. Culp
(Name: Please Print)
15837 Wright Dr.
(Street Address)
Guerneville CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. ~~Please put my name and address on your notification list for all meetings and documents related to this project.~~ NA_Culp-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Culp-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Culp-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Culp-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Culp-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Culp-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Culp-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Culp-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Culp-9

Sincerely,

Thomas F. Culp 1/28/2010
(Signature) (Date)

Thomas Culp, January 28, 2011

NA_Culp-1 Commenter's name and address added to distribution list.

NA_Culp-2 Commenter is identifying individual uses of the Russian River.

NA_Culp-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Culp-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Culp-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Culp-6 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Culp-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Culp-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Culp-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane. Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Dr. Frank Dane (P.H.D)
(Name: Please Print)

8796 Vila Rd.
(Street Address)

Forestville, 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Dane-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Meditation. NA_Dane-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Dane-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Dane-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Dane-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Dane-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Dane-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Dane-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Dane-9

Sincerely,

Dr Frank Dane 1/13/2011
(Signature) (Date)

Frank Dane, January 13, 2011

NA_Dane-1 Commenter's name and address added to distribution list.

NA_Dane-2 Commenter is identifying individual uses of the Russian River.

NA_Dane-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dane-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dane-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Dane-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Dane-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dane-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Dane-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COMMENTS ON DRAFT EIR FOR THE RUSSIAN RIVER ESTUARY PROJECT

I have lived in Forestville for 28 years. I am a homeowner and taxpayer. I've been an admirer and supporter of the river for a long time. I go for long swims in the river, mostly between Steelhead Beach and Sunset Beach in Forestville. (Near the Hacienda Bridge) Our family moved here in 1983. My kids have grown up and moved away, but they come back in the summer to go to the river. It has always been a favorite family activity. I have been following River issues since 1986, when hearings were held at the Luther Burbank Center following Santa Rosa's sewage spill into the river. My son was in kindergarten at the time. I went to the hearings in the morning by myself, got my son at school and let him play with toys on the floor of the LBC balcony while I listened to the hearings in the afternoon. My son is 29 years old now, pursuing a PhD in math at Berkeley. I help with river cleanups. Currently I'm volunteering on Wednesdays at the Riverkeeper Demonstration Stewardship Park in Guerneville. I am an artist and have several paintings of the river. I like to invite friends to come to the river to go swimming and picnic. It's one of the advantages of living here.

The item of greatest concern to me is that the Sonoma County Water Agency is proceeding with questionable policies without regard to consequences.

Questions about the Biological Opinion

The Water Agency says it must do what it is doing to comply with the Biological Opinion. The Water Agency has also said that the Biological Opinion is a narrowly focused document which does not take into account the well-being of other creatures besides the three listed salmon species, and does not consider human users of the river. The Biological Opinion completely leaves out any analysis of what would happen to the lower river (for fish or humans,) if the plan to change decision 1610 were carried out. Usually, when big changes are being considered, a comprehensive view of the whole situation is called for. But we have no comprehensive view. Yet we are told that the Water Agency is compelled to completely follow the recommendations of an incomplete non-comprehensive report. This does not make sense.

Has the Biological Opinion been reviewed or certified by any other agencies? NA_Delon-1

Of particular concern to me is the recommendation that the flow of the entire river be lowered by 44%. In the lower river, in Forestville, where I live, this would be a disaster. I like to go swimming. Because of drought emergencies in 2004, 2007 and 2009, I've seen for myself, what the proposed water flow level is like. It makes the river more like a creek. Many places are too shallow for swimming or rafting. In reading through the DEIR for the estuary project, I don't see the justification for lowering the flow of the entire river. In 2009 when flows were very low, the mouth of the river was open. In 2010, the Water Agency was permitted to cut river flow, but it didn't work out because there was too much water. So, evidently, the estuary project does not and cannot depend on low inflow from the river. Therefore, there is no justification for the damaging effects on recreation and water quality that low flow would bring. Please save everyone's time and energy and drop "low flow" from the equation. NA_Delon-2

This is from section 3.3 of the Draft EIR on the estuary project:

"During the lagoon management period, the outlet channel would be expected to perform over a range of flow conditions that could be experienced from May to October. As such, the Estuary Management Project is not reliant upon temporary or permanent changes to D1610 for its implementation."

This contradicts the assertion in the Biological Opinion that changes to decision 1610 are needed for the estuary project. While I'm glad that half of the reason for the request to lower river flow has now been removed, the Water Agency is still requesting low flow, so it is still relevant. NA_Delon-3

The "Reasonable and Prudent Alternative"

The Biological Opinion calls the idea to lower the flow of the entire river, part of the "Reasonable and Prudent Alternative." Who decided that this was "reasonable?" Who decided that this was "prudent?" Based on what? This idea is presented as part of the Biological Opinion, but it is truly someone's opinion, and is not based on NA_Delon-4

science or study of the situation. NA_Delon-4 cont.

I have lived near the Russian River for 28 years. There was swimming here for at least 70 years before I moved here. I feel that it is reasonable to expect to continue being able to go swimming at the river. It is therefore not "reasonable" to expect that the water necessary for swimming will be cut off by an act of the Water Agency. NA_Delon-5

Decision 1610 determined what would be the minimum river flow for recreation, allowing that some years may be drought years. After experiencing conditions in the river and checking the Internet for information on river flow, I feel that D1610 is a reasonable and prudent law. 125 cfs at Hacienda Bridge provides a low but adequate amount of water for recreation. The conditions for recreation have not changed. It still requires the same amount of water to go swimming. The radical change proposed by the Biological Opinion is therefore not "reasonable and prudent." NA_Delon-6

The people of the lower Russian River depend on the river for recreation, relaxation, family togetherness, and cooling off. The river is already a shallow, gently flowing river. Take away 44% of the flow and you have a pathetic, anemic body of water for thousands of people to swim in. How is this "reasonable" or "prudent?"

Many businesses along the river depend on the river for their success. There are canoe rentals, kayak rentals, sporting goods, vacation cottages, vacation homes, art galleries, craft stores and restaurants that depend on people coming out to the river. Would it be "reasonable" or "prudent" to eliminate the flow that has been determined to be necessary for recreation? NA_Delon-7

We have seen with the low flow experiments in recent years that low flow causes algae blooms and the growth of plants in the riverbed. Would it be "reasonable" or "prudent" to continue the conditions that cause this? NA_Delon-8

Low flow in the lower river makes for increased water temperatures, while salmon prefer cool water. Is it "reasonable" and "prudent" to lower the flow of the river and allow the water temperature to rise? NA_Delon-9

Low flow damages water quality. The lower river has had problems with high bacteria counts during low flow. Would it therefore be "reasonable" and "prudent" to continue with low flow permanently? NA_Delon-10

With low flow, there is less velocity refuge for fish. The way most of the lower river is, there is current on one side and a puddled-out place on the other side. The puddled-out place with no current is bigger when there is more water. Deep cool pools, and all kinds of habitat are more abundant when there is more water. With low flow, the river narrows, and there is less choice about where fish or people can swim. NA_Delon-11

From an observer's point of view, the shallow waters of low flow seem to favor predators of fish. Fish have fewer places to hide. One can see right through the shallow water. NA_Delon-12

Given all of these factors, it would seem more "reasonable" and "prudent" to keep flows as they are. NA_Delon-13

Here is the only place I found in the Biological Opinion that related to the effects that "low flow" would have on recreation: (P.246, 247)

During summer 2007 when stream flows were in the vicinity of 80 to 100 cfs, depths and velocities in shallow riffles were lower than when flows are between 140 and 180 cfs (more typical, recent summer flows in the lower Russian River). Nevertheless, during summer 2007, observations by NMFS staff indicate that recreational canoeing and kayaking was feasible and viable throughout the lower river (W. Hearn, NMFS, personal communication). Effects of the lowered minimum flows in 2007 on recreational boating were negligible in the several miles of river impounded by county summer dams (i.e., Vacation Beach dam, Johnson Beach dam, and the SCWA dam at Mirabel). Therefore, although recreational boating may be affected by reduced summer flows, the effect is likely minor and insufficient to cause SWRCB to reject a change in the minimum flow requirements currently stipulated by D1610. NA_Delon-14

There are a few things wrong with this analysis:

1. "Recreational boating" is not the only activity on the river that requires water. In the 367 pages of the Biological Opinion, I couldn't find any mention of people using the river for swimming. NA_Delon-15

2. Because there was still enough water to navigate in areas behind the dams does not mean that there were not problems navigating in many areas that are not behind dams. Most people in canoes and kayaks are going for a trip down the river - which would include all river conditions. When the water is too low, they will scrape bottom or need to carry the canoe. NA_Delon-16

3. Most of the river beaches are not behind dams. NA_Delon-17

4. Some areas that are behind dams are not suitable for swimming. (Like the dam at Mirabel.) NA_Delon-18

5. Just because there is still enough water behind the dams for swimming doesn't mean there is enough room on the beach or in the parking lots at those places. We need all of the areas currently used for recreation - not just some of them. NA_Delon-19

6. *"Therefore, although recreational boating may be affected by reduced summer flows, the effect is likely minor and insufficient to cause SWRCB to reject a change in the minimum flow requirements currently stipulated by D1610."*

The statement that "the effect is likely minor" is again, someone's offhand, unsubstantiated opinion, and seems to dismiss our whole recreation scene with a surprising lack of study or input from those affected. (Whose opinion is this?) NA_Delon-20

Other Questions

Does the Sonoma County Water Agency have a vested interest in lowering the flow of the Russian River?

Given that the Water Agency has been trying for the last 7 years to lower the flow of the river, I can't help but notice that the Biological Opinion conveniently mandates that the Water Agency do what it wanted to do anyway- lower the flow of the Russian River. The city of Santa Rosa wants more water from the river. There are thousands of acres of new irrigated vineyards that have been planted in recent years. If the Water Agency is NA_Delon-21 concerned about water supply, I can see why. However, I feel that the cultural resource, the recreation, and the chance to do something in nature, provided by the recreation scene at the river are too valuable to be simply NA_Delon-22 dismissed without a thought. To pretend that our communities do not exist, or will not be affected is insulting. The Sonoma County Water Agency petitioned the State to change the law without any regard for the human users, without any regard for the businesses and culture and housing that have grown up around the Russian River. It is not necessary for the estuary project to lower the flow of the entire river. If flows have been determined to be too high for good rearing habitat for salmon in the upper river and Dry Creek, why is the only solution mentioned the idea of lowering the flow of the entire river? Another solution would be to send some water through a pipeline to water users instead of sending all of the irrigation water down the river. Another solution would NA_Delon-23 be to provide less water to vineyards. I recently learned that my grandfather farmed grapes using dry farming in southern California. Most grapes in this area were dry-farmed until the 1960's. Yet, instead of citing all of the possible alternatives, the Biological Opinion chose to isolate this one idea (lower the flow of the whole river,) and promote it, along with the Water Agency. All of the sacrifice is expected to come from the users of the lower Russian River. We are expected to accept lower water levels because the water in the river was lower in the 1800's. Well, a lot of things have changed since the 1800's. And we're not going back to the 1800's for any other factor.

Why is gravel mining being permitted in the Russian River?

I was surprised to see that the Board of Supervisors has issued permission for a large-scale gravel-mining project. Given that conditions for salmon are so serious that the SCWA/Board of Supervisors is seeking to lower NA_Delon-24 the flow of the entire river, **damaging recreation for thousands of people,** why has the board approved a project

that, according to the Riverkeeper, will definitely cause harm to salmon habitat? Is the SCWA really concerned about endangered species, or are the Biological Opinion and Endangered Species Act just being used as an excuse to ask again for "low flow" in the Russian River? NA_Delon-24 cont.

The Estuary Plan

As far as the estuary plan itself, I'm not a scientist, but just as an observer, it doesn't seem very well researched. Are the river estuaries the scientists used as a model for this really enough like the Russian River to be meaningful? As someone who has raised animals, I am concerned that the breaching of the sandbar with a bulldozer is too disruptive to the seals and to the fish. It seems like too much of a sudden change of habitat for the fish. The Biological Opinion recommends a closed lagoon, with a freshwater stream running through it, not a lagoon that is breached with a bulldozer. NA_Delon-25 NA_Delon-26 NA_Delon-27 NA_Delon-28

Ideally, it seems like the estuary would be designed so that the overflow after a certain level would be conveyed to the ocean, making it mostly a freshwater lagoon with fresh water running through it, but ocean influence would still be allowed at times, allowing the fish to acclimate to salt water. NA_Delon-29

So far, moving sand at the mouth of the river has not been successful in creating a perched lagoon. Is there any reason to believe that this will be successful in the future? If the outflow channel is made of sand, and water is running over that sand, isn't it inevitable that the channel will erode away? NA_Delon-30

What about the other fish and creatures who share this area? Some people have mentioned that the Dungeness crab lives in the estuary and needs salt water. What about the seals? Some say they leave when the river mouth has closed. What about other species of fish? What about sea birds? Will the estuary plan harm the other creatures? What about the effect of backing up water in the river and holding it there for months? Will water quality be affected? So many things and creatures may be affected by closing the river mouth, that I see the possibility of spending a lot of resources studying these effects without helping salmon. NA_Delon-31 NA_Delon-32

I am also concerned with river beaches being inundated. If we are wiping out recreation areas, the plan may need some adjustment. How much of these beaches will be covered with water? The section on recreation in the DEIR has so little information; it looks like an outline waiting to be filled in. Is there more information coming? I don't see how decision makers can make a decision with so little information. For example, there is no feedback from local people who own businesses or use the recreation in the area of study. Also, there is the issue that the effects of trying to keep the river mouth closed will go upriver beyond the area being studied. NA_Delon-33 NA_Delon-34 NA_Delon-35

There seems to be some consensus on the following issues: NA_Delon-36

- It would be better to work toward zero bulldozer breaches.
- It would be okay to let the estuary go higher than now, up to 8', without breaching, to allow for a lagoon for fish and no bulldozer action on the beach for seals.
- It would be worth studying removal of the jetty to allow for a more natural interaction between river flow and ocean waves to see if that creates beneficial conditions for fish.

Conclusions

It seems that what environmentalists fear is that blocking the river's mouth may create a large stagnant lake, a water quality nightmare that would do more harm than good. I guess no one knows for sure what would happen. It seems highly experimental. I would be more comfortable with resources spent on things that we are more sure will benefit salmon- like restoration of tributaries, removing impediments to fish migration and making sure the tributaries have enough water. A recent article in the Bohemian (newspaper,) highlighted the case of Mark West Creek, which used to be a major spawning and rearing area. Apparently, it's been running dry in recent years in the summertime, probably because of a vineyard. Attention should also be given to the possibility of chemicals from the vineyards harming fish in the creeks. Things like this could turn out to be more important for fish than NA_Delon-37

the estuary management. I feel that a comprehensive view of what is causing problems for salmon would be valuable, so that priorities can be set. NA_Delon-37 cont.

Thank you for the opportunity to comment on the DEIR for the Russian River Estuary Project.

Sincerely,

Barbara DeIonno

8175 Park Av

Forestville CA 95436

707-887-9565

Barbara Delonno, February 14, 2011

NA_DeIon-1 Section 7 of the Endangered Species Act, 16 USC Section 1536(a)(2), requires agencies to consult with NMFS regarding impacts to marine and anadromous species[1] under NMFS jurisdiction if they are proposing an "action" that may affect listed species or their designated habitat. The Russian River Biological Opinion is a federal mandate to implement measures to reduce or avoid impacts to listed salmonids. A Biological Opinion is the written opinion of the National Marine Fisheries Service and summarizes the information used and a detailed discussion of the effects of the action on the species or its critical habitat. The Biological Opinion only addresses species within NMFS jurisdiction. It is not intended to serve as a comprehensive environmental review document. California Department of Fish and Game has reviewed issued a Consistency Determination under the California Endangered Species Act, and concurring with the Biological Opinion, as described in Draft EIR Chapter 1.0, Introduction, on page 1-2. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_DeIon-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Draft EIR Chapter 5.0, Cumulative Projects, analyzes potential cumulative impacts associated with implementation of the Estuary Management Plan and other future, reasonably foreseeable and non-Russian River Instream Flows and Restoration Program (RRIFR) Projects, including the Fish Habitat Flows and Water Rights Project EIR.

NA_DeIon-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_DeIon-4 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.The Biological Opinion recommends "reasonable and prudent alternatives" (RPAs) to the artificial breaching activities to avoid jeopardizing or adversely modifying critical habitat of the listed species. These reasonable and prudent alternatives are conditions of permit issuance.

[1] United States Fish and Wildlife Services is the federal agency for fresh-water and wildlife species.

NA_DeIon-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. As part of the Estuary Management Project, an analysis of potential direct impacts and cumulative impacts to recreational resources and opportunities are disclosed in Draft EIR Section 4.7, Recreation.

NA_DeIon-6 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. See response to NA_DeIon-5, above. Please also refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

NA_DeIon-7 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. See response to comment NA_DeIon-5, above. Please also refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

NA_DeIon-8 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion regarding the invasive aquatic plant species, *Ludwigia*, refer to **Master Response 2.4, Water Quality** in **Chapter 2, Master Responses**, for a discussion of potential secondary biological effects related to water quality impacts.

NA_DeIon-9 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Water quality parameters, including temperature, relative to the Estuary Management Plan are analyzed in Draft EIR Section 4.2, Impact 4.3.2 and project impacts related to temperature are determined to be less than significant. Potential water quality impacts of the Estuary Management Project on fisheries are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2. For additional discussion related to Draft EIR analysis of Estuary Management Project impacts to water quality, refer to **Master Response 2.4, Water Quality** in **Chapter 2, Master Responses**.

NA_DeIon-10 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Water quality constituents, including bacteria, relative to the Estuary

Management Plan are analyzed in Draft EIR Section 4.3, Water Quality, Impact 4.3.3 and project impacts related are determined to be potentially significant and unavoidable. For additional discussion related to Draft EIR analysis of Estuary Management Project impacts to water quality, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_DeIon-11 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project focuses on rearing habitat in the river's Estuary and does not impact availability of pool habitat upstream. Potential water quality impacts of the Estuary Management Project on fisheries habitat are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2.

NA_DeIon-12 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Estuary Management Project focuses on rearing habitat at the mouth of the river and does not impact availability of refuge habitat upstream. Potential water quality impacts of the Estuary Management Project on fisheries habitat are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2.

NA_DeIon-13 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_DeIon-14 See response to comment NA_DeIon-5.

NA_DeIon-15 See response to comment NA_DeIon-5.

NA_DeIon-16 See response to comment NA_DeIon-5.

NA_DeIon-17 See response to NA_DeIon-5. As discussed in Draft EIR Section 4.7, Recreation, the extent of river beaches (not restricted to those behind dams) that may be affected by the Estuary Management Project is quantified and determined to be significant and unavoidable.

NA_DeIon-18 The Draft EIR does not recommend specific areas for swimming.

NA_DeIon-19 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. See response to NA_DeIon-5. The Draft EIR does not recommend

specific areas for swimming. Changes in availability and location for swimming opportunities are not anticipated.

NA_DeIon-20 The comment quotes language from the Biological Opinion. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_DeIon-21 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_DeIon-22 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR includes environmental analyses for potential effects of the Estuary Management Project to cultural and recreational resources (Draft EIR Sections 4.8 and 4.7, respectively).

NA_DeIon-23 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_DeIon-24 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. The EIR for the Fish Habitat Flows and Water Rights Project will need to address the cumulative impact to recreation when considered with effects from gravel mining. This EIR does not analyze the Sonoma County Board of Supervisors' decision to approve gravel mining operations. As disclosed in Draft EIR Chapter 5.0, Cumulative Analysis, although the mining operations governed by the Aggregate Resources Mining Plan are located within the Russian River Watershed, the Estuary Management Project would not contribute to erosion/sedimentation, channel incision, or resource extraction impacts generally associated with mining operations, and therefore would not be cumulatively considerable when implemented in conjunction with gravel mining operations. The Estuary Management Project is intended to enhance fisheries habitat; it does not involve any mineral or aggregate mining. Therefore, the Estuary Management Project's contribution to these types of impacts would be less than cumulatively considerable. Since this comment does not affect the environmental analysis in the Draft EIR, no changes in the Final EIR are required.

NA_DeIon-25 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for discussion of adaptive management and project feasibility. The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion.

NA_DeIon-26 Potential short term impacts associated with disturbance to seals and fish from machinery used to manage the barrier beach and create the lagoon outlet channel are disclosed in Impact 4.4.1, in Draft EIR Section 4.4, Biological Resources, and determined to be less than significant due to requirements stipulated in the Marine Mammal Protection Act IHA.

NA_DeIon-27 Sudden water quality changes for fish are considered in the Draft EIR Section 4.5, Fisheries, Impact 4.5.2. In some years, with low freshwater inflow, natural lagoons have been documented to remain stratified throughout the summer and fall, with denser saltwater on the bottom forming high temperature, low dissolved oxygen saltwater lenses and reduced invertebrate abundance (Smith, 1990). Similarly, the Navarro River Estuary, which is more similar in size and configuration to the Russian River Estuary did not always fully convert to freshwater after it closed, but remained stratified in some years (NMFS, 2008). Steelhead productivity in the Navarro remained high despite prolonged stratification due to abundant food and a stable surface freshwater layer (NMFS, 2008). Please refer to Draft EIR Section 4.5, Fisheries, for further discussion of this topic.

The adaptive management plan developed for the proposed project requires monitoring of biological productivity, water quality, and physical processes in the Estuary in response to changes in water surface elevations in the estuary-lagoon system; and refinement of management actions to achieve desired water levels to support biological productivity. As stated in the Draft EIR, impacts potentially resulting from the proposed management of the Estuary relating to habitat critical water quality conditions becoming stressful for rearing listed juvenile salmonids, special status, and other native fish species inhabiting the Estuary are considered less than significant.

NA_DeIon-28 This comment characterizes target conditions identified in the Biological Opinion related to creation of perched freshwater lagoon conditions. No response or revision of text necessary.

NA_DeIon-29 See Draft EIR Chapter 2, Project Description, beginning on page 2-14, for information regarding the design and function of the outlet channel and transition of the Estuary from tidal and saline to brackish/freshwater.

NA_DeIon-30 For a discussion regarding project feasibility, please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**.

NA_DeIon-31 The focus of the Estuary Management Plan is federally listed salmonid species; however the Draft EIR recognizes a variety of aquatic and terrestrial species rely on estuarine habitat for some or all of their life phases. Draft EIR Section 4.5, Fisheries, includes analysis of other non-protected aquatic species, including Dungeness crab.

As described in the analysis discussion in Impact 4.5.2, impacts potentially resulting from the proposed management of the Estuary relating to habitat critical water quality conditions becoming stressful for special status and other native fish species inhabiting the Estuary are considered less than significant.

Draft EIR Section 4.4, Biological Resources, includes analysis of other common and special status amphibian, bird, and wildlife species, including harbor seals.

NA_DeIon-32 Refer to response to comment NA_Burge-4 for a discussion of estimated residence time of water in the Estuary. See Draft EIR Section 4.3, Water Quality, for a discussion of potential water quality impacts. For additional discussion related to Draft EIR analysis of Estuary Management Project impacts to water quality, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_DeIon-33 Draft EIR Section 4.7, Recreation provides existing settings of private and public beach access. Impacts 4.7.1, beginning on page 4.7-8, quantifies and characterizes potential impacts to riverfront beaches associated with the Estuary Management Project.

NA_DeIon-34 Please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility,** and **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_DeIon-35 Please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_DeIon-36 Draft EIR Chapter 6.0, Alternatives Analysis includes an alternative addressing the jetty removal study, as well as a Reduced Project Alternative (8-foot maximum). It should be noted that this alternative would still require creation of an outlet channel, and associated machinery on the beach during channel creation, to allow river outflow. The Estuary Management Plan was developed pursuant to the Russian River Biological Opinion, which determined the Water Agency's current management regime jeopardizes listed species. As described in Draft EIR Chapter 2.0, Project Description, bulldozers are still required for project implementation. Temporary effects of equipment on beaches are disclosed in Draft EIR Chapter 4.0 Environmental Setting, Impacts, and Mitigation Measures. Draft EIR Chapter 6.0, Alternative Analysis includes

consideration and evaluation of a Reduced Project Alternative (8-foot maximum) and study of jetty modification. Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses** for additional information regarding alternative selections and analysis.

NA_DeIon-37 As identified in Draft EIR Chapter 1.0, Introduction, the Estuary Management Project would be implemented in accordance with an adaptive management plan. Please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis, and Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Detailed analysis of non-point source pollutants affecting the Russian River and its tributaries are beyond the scope of analysis for this EIR.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 1 0 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Russian River Art Gallery

16200 First Street
on the Plaza
Guerneville, CA 95446

707-869-9099

Open
Winter/Spring:
Thurs-Mon: 11a-5p
Summer/Fall:
Mon-Sat: 10a-6p
Sundays: 11a-5p

www.russianriverartgallery.com

I strongly oppose the closed Estuary Plan and Low Flow on the Russian River. this will cause sele pollution and algae growth choke the River it will not be good for fish or people

Sheila Defoy
869-3552

to SCWA
Jessica Martini-Lamb
404 aviation Blvd.
Santa Rosa
Ca. 95403

NA_Defoy-1

NA_Defoy-2

S. Defoy, February 10, 2011

NA_Defoy-1 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Defoy-2 For a discussion regarding water quality relative to pollutant levels, health of fish and humans, and invasive plants, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

Comment Letter NA_Dent

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

DAVID & LISA DENT
(Name: Please Print)
21369 Monte Cristo Ave
(Street Address)
Monte Rio, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Dent-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Dent-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Dent-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Dent-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Dent-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Dent-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Dent-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Dent-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Dent-9

Sincerely,

(Signature) 1/13/11 (Date)

David & Lisa Dent, January 13, 2011

NA_Dent-1 Commenter's name and address added to distribution list.

NA_Dent-2 Commenter is identifying individual uses of the Russian River.

NA_Dent-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dent-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dent-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Dent-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Dent-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Dent-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Dent-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Eugene Donatelli
(Name: Please Print)

10225 1st
(Street Address)

Vella Cravedo
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Donat-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Donat-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Donat-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Donat-4
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Sincerely,

Eugene M Donatelli 2-2-11
(Signature) (Date)

Eugene Donatelli, February 2, 2011

NA_Donat-1 Commenter's name and address added to distribution list.

NA_Donat-2 Commenter is identifying individual uses of the Russian River.

NA_Donat-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Donat-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Donat-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Donat-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Donat-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Donat-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Donat-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 24 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

GARY L. DOUGAN
(Name: Please Print)

5278 MANILA AVE
(Street Address)

OAKLAND CA 94618
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Douga-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and canoeing, hiking. NA_Douga-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Douga-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Douga-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Douga-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Douga-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Douga-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Douga-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Douga-9

Sincerely,

Gary L. Dougan 1/18/11
(Signature) (Date)

Gary Dougan, January 18, 2011

NA_Douga-1 Commenter's name and address added to distribution list.

NA_Douga-2 Commenter is identifying individual uses of the Russian River.

NA_Douga-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Douga-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Douga-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Douga-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Douga-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Douga-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Douga-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Gilbert Ege
(Name: Please Print)

20196 River Blvd
(Street Address)

Monte Rio 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Ege-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Ege-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ege-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ege-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ege-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ege-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ege-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ege-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ege-9

Sincerely,

Gilbert Ege 1-12-11
(Signature) (Date)

Gilbert Ege, January 12, 2011

NA_Ege-1 Commenter's name and address added to distribution list.

NA_Ege-2 Commenter is identifying individual uses of the Russian River.

NA_Ege-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ege-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ege-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Ege-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ege-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ege-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ege-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

ANN EHRHARDT
(Name: Please Print)

14230 LAUREL
(Street Address)

GUERNEVILLE, 95546
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. ~~Please put my name and address on your notification list for all meetings and documents related to this project.~~ NA_Ehrha-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Weekend retreat. NA_Ehrha-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ehrha-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ehrha-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ehrha-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ehrha-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ehrha-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ehrha-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ehrha-9

Sincerely,

Ann Ehrhardt 1-12-11
(Signature) (Date)

Ann Ehrhardt, January 12, 2011

NA_Ehrha-1 Commenter's name and address added to distribution list.

NA_Ehrha-2 Commenter is identifying individual uses of the Russian River.

NA_Ehrha-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ehrha-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ehrha-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Ehrha-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ehrha-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ehrha-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ehrha-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 26 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Kathleen Elbe
(Name: Please Print)

① 6367 No Point Way
(Street Address) ② 9536 Goat Hill Rd

① Sacramento 95831
(Town) (Zip Code)

② Jenner

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Elbe-1

I utilize the Russian River in the following way(s): property owner, ~~business owner~~, recreationist and/~~or tourist~~, ~~for artistic expression~~, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Elbe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Elbe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Elbe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Elbe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Elbe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Elbe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Elbe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Elbe-9

Sincerely,

Kathleen Elbe — January 21, 2011
(Signature) (Date)

Kathleen Elbe, January 21, 2011

NA_Elbe-1 Commenter's name and address added to distribution list.

NA_Elbe-2 Commenter is identifying individual uses of the Russian River.

NA_Elbe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elbe-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elbe-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Elbe-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Elbe-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elbe-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Elbe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 25 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Richard Eliason
(Name: Please Print)

20395 Railroad Ave.
(Street Address)

Monte Rio, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Elias-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Elias-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Elias-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Elias-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Elias-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Elias-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Elias-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Elias-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Elias-9

Sincerely,

(Signature) 24 Jan 2011 (Date)

Richard Eliason, January 24, 2011

NA_Elias-1 Commenter's name and address added to distribution list.

NA_Elias-2 Commenter is identifying individual uses of the Russian River.

NA_Elias-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elias-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elias-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Elias-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Elias-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Elias-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Elias-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

Comment Letter NA_Eliza

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Margaret Elizares
(Name: Please Print)

14181 Woodland Dr.
(Street Address)

Guerneville 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Eliza-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Eliza-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Eliza-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Eliza-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Eliza-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Eliza-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Eliza-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Eliza-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Eliza-9

Sincerely,

Margaret Elizares 1/14/11
(Signature) (Date)

Margaret Elizares, January 14, 2011

NA_Eliza-1 Commenter's name and address added to distribution list.

NA_Eliza-2 Commenter is identifying individual uses of the Russian River.

NA_Eliza-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Eliza-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Eliza-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Eliza-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Eliza-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Eliza-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Eliza-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Enoch

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

MIKE ENOCHS
(Name: Please Print)

21541 STARRETT HILL DR (P.O. BOX 102)
(Street Address)

MONTE RIO, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Enoch-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and CANOEING. NA_Enoch-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Enoch-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Enoch-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Enoch-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Enoch-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Enoch-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Enoch-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Enoch-9

Sincerely,

Mike Enoch JAN 13, 2011
(Signature) (Date)

Mike Enochs, January 13, 2011

NA_Enoch-1 Commenter's name and address added to distribution list.

NA_Enoch-2 Commenter is identifying individual uses of the Russian River.

NA_Enoch-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Enoch-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Enoch-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Enoch-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Enoch-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Enoch-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Enoch-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter Fahle

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

NOELLE FAHLEN
(Name: Please Print)

15450 DRAKE RD.
(Street Address)

GUERNEVILLE 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Fahle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and KAYAKING. NA_Fahle-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Fahle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Fahle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Fahle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Fahle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Fahle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Fahle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Fahle-9

Sincerely,

Noelle Fahlen 1/12/11
(Signature) (Date)

Noelle Fahlen, January 12, 2011

NA_Fahle-1 Commenter's name and address added to distribution list.

NA_Fahle-2 Commenter is identifying individual uses of the Russian River.

NA_Fahle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fahle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fahle-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Fahle-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Fahle-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fahle-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Fahle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 6 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

(Name: Please Print)

(Str

ELEANOR M. FAULKNER
281 Gerry Ct.
Walnut Creek, CA 94596-5824

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Faulk-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Faulk-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Faulk-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Faulk-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Faulk-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Faulk-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Faulk-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Faulk-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Faulk-9

Sincerely,

Eleanor M. Faulkner 1-21-2011

(Signature) (Date)

Eleanor Faulkner, January 21, 2011

NA_Faulk-1 Commenter's name and address added to distribution list.

NA_Faulk-2 Commenter is identifying individual uses of the Russian River.

NA_Faulk-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Faulk-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Faulk-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Faulk-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Faulk-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Faulk-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Faulk-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Celeste Felciano
(Name: Please Print)

P.O. box 863 / 20D1 Adobe Canyon Rd.
(Street Address)

Glen Ellen Ca. 95442
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. ~~Please put my name and address on your notification list for all meetings and documents related to this project.~~ NA_Felci-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Felci-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Felci-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Felci-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Felci-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Felci-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Felci-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Felci-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Felci-9

Sincerely,

C. Felciano 1-15-11
(Signature) (Date)

Celeste Felciano, January 15, 2011

NA_Felici-1 The comment is consistent with other form letter comments, but strikes the request to include contact information in the project distribution list. Pursuant to CEQA procedures, as a commenter to the Draft EIR, participant will receive a copy of the Final EIR and Responses to Comments document.

NA_Felici-2 Commenter is identifying individual uses of the Russian River.

NA_Felici-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Felici-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Felici-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Felici-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Felici-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Felici-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Felici-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Fento1

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Kate Fenton
(Name: Please Print)

29001 Willow Creek Rd.
(Street Address)

Jenner 95450
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Fento1-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Fento1-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Fento1-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Fento1-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Fento1-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Fento1-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Fento1-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Fento1-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Fento1-9

Sincerely,

Kate Fenton 1/7/11
(Signature) (Date)

Kate Fenton, January 7, 2011

NA_Fento1-1 Commenter's name and address added to distribution list.

NA_Fento1-2 Commenter is identifying individual uses of the Russian River.

NA_Fento1-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2**, **Master Responses**.

NA_Fento1-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fento1-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Fento1-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Fento1-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fento1-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Fento1-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

RECEIVED
FEB 10 2011
By

Kate Fenton
P.O. Box 86
Jenner, CA 95450
kafenton@sonic.net

Lenny Weinstein
P.O. Box 526
Monte Rio, CA 95462
lweinsign@yahoo.com

February 8, 2011

Jessica Martini Lamb
Sonoma Count Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

Re: Estuary Project DEIR

Dear Ms Lamb:

Enclosed are our comments for the Board.

1. Have you considered and thoroughly examined the possibility of taking out the jetty at the River mouth now, rather than in the future, including the fact that it would be more cost-effective? Don Martin, who has surfed the River mouth for 30 years, has submitted his ideas with drawings. NA_Fento2-1
2. Why are Low Flow and the Estuary not being studied together? Is this not illegal piecemealing according to CEQA? NA_Fento2-2
3. If the quantity of water in the River is reduced, will it be enough to dilute the toxins that would kill migrating salmonids? NA_Fento2-3
4. When will the results of water quality studies be available to the public? NA_Fento2-4
5. Why is water quality only being studied as far upstream as Duncans Mills? NA_Fento2-5
6. Where can one view a graphic image of the planned outlet channel? NA_Fento2-6
7. Since the project is likely not to work for many reasons (difficulty of manipulating the River mouth, predation and the rest of the hazards that await the salmonids—toxics including sewage, algae, pesticides, herbicides, and pharmaceuticals, siltation in the pools, temperature that is too warm because of reduced flows), why destroy the lower River's economy by making fishing, boating and surfing all but impossible? NA_Fento2-7

Thank you for your consideration.

Sincerely yours,

Kate Fenton

Kate Fenton

Lenny Weinstein

Cc: ESA

Kate Fenton & Lenny Weinstein, February 8, 2011

NA_Fento2-1 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a jetty study plan to analyze the effects of the jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Fento2-2 For a detailed discussion on the relationship between the Estuary Management Project and the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fento2-3 For a discussion on the relationship between the Estuary Management Project and the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Potential water quality impacts of the Estuary Management Project on fisheries are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2.

NA_Fento2-4 Please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses** for discussion of availability of water quality data.

NA_Fento2-5 For a discussion regarding geographic extent of the project area analyzed under the Estuary Management Plan, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis,** in **Chapter 2, Master Responses**.

The Water Agency will continue its current Estuary water quality monitoring program, and will modify that program to gather appropriate water quality information required under the Russian River Biological Opinion, in consultation with regulatory agencies, as appropriate. For a discussion related to water quality and subsequent monitoring requirements, refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses.**

NA_Fento2-6 Photographs of the lagoon outlet channel, as implemented in July 2010, are included in the Draft EIR Chapter 2.0, Project Description, page 2-20.

NA_Fento2-7 For a discussion regarding project feasibility, please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. For a discussion regarding CEQA requirements related to socioeconomic impacts, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts, and Mitigation Feasibility,** in **Chapter 2, Master Responses**.

Megan Steer

From: Deborah Filipelli [dfilipelli@mcn.org]
Sent: Saturday, February 12, 2011 10:57 AM
To: estuaryproject
Subject: Russian River Estuary Management Project DEIR

To: Jessica Martini-Lamb

Re: Russian River Estuary Management Project DEIR

The health of the Russian River Estuary is important to me as it enhances the quality of my life.

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Filip-1

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Filip-2
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Filip-3
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Filip-4
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Filip-5
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Filip-6
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Filip-7

Sincerely,

Deborah Filipelli, Ph.D.

P.O. Box 341, The Sea Ranch, CA 95497

Deborah Filipelli, February 12, 2011

NA_Filip-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Filip-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Filip-3 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Filip-4 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Filip-5 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Filip-6 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Filip-7 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Fiore

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Richard A Fiore
(Name: Please Print)

510 Mission St.
(Street Address)

S F, CA 94105
(Town) (Zip Code)

Own 2022 c Breen CT
Monte Rio, CA

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Fiore-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Fiore-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Fiore-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Fiore-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Fiore-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Fiore-6
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- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Fiore-9

Sincerely,

Richard A. Fiore 1/11/11
(Signature) (Date)

Richard Fiore, January 11, 2011

NA_Fiore-1 Commenter's name and address added to distribution list.

NA_Fiore-2 Commenter is identifying individual uses of the Russian River.

NA_Fiore-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Fiore-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fiore-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Fiore-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Flynn

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Barbara Ann Flynn
(Name: Please Print)

8290 Appian Way
(Street Address)

Sebastopol 95472
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Flynn-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Flynn-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Flynn-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Flynn-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Flynn-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Flynn-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Flynn-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Flynn-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Flynn-9

Sincerely,

Barbara A. Flynn 1-10-2011
(Signature) (Date)

Having been part of the Amigos de Bolsa Chica in Orange County which has successfully restored fish + wildlife habitat in the estuary there, I was appalled to learn, when I moved here, that this area mistreats the Russian River so badly. NA_Flynn-10

Barbara Flynn, January 10, 2011

NA_Flynn-1 Commenter's name and address added to distribution list.

NA_Flynn-2 Commenter is identifying individual uses of the Russian River.

NA_Flynn-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Flynn-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Flynn-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Flynn-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Flynn-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Flynn-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Flynn-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Flynn-10 Refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion on other river and lagoon systems in California and the relationship to the Russian River.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 24 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Mary W Fox
(Name: Please Print)

1253 Glenn St.
(Street Address)

Santa Rosa CA 95401
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Fox-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Concerned county citizen. NA_Fox-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Fox-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Fox-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Fox-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Fox-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Fox-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Fox-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Fox-9

Sincerely,

Mary W Fox 1/21/11
(Signature) (Date)

Mary Fox, January 21, 2011

NA_Fox-1 Commenter's name and address added to distribution list.

NA_Fox-2 Commenter is identifying individual uses of the Russian River.

NA_Fox-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fox-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Fox-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Fox-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Fox-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.**

NA_Fox-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Fox-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 4 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Caren Franci
(Name: Please Print)
6026 Fredricks Rd
(Street Address)
Sebastopol, Ca
(Town) (Zip Code)
95472

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Franc-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Franc-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Franc-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Franc-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Franc-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Franc-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Franc-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Franc-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Franc-9

Sincerely,

Caren Franci 2-2-2011
(Signature) (Date)

Caren Franci, February 2, 2011

NA_Franci-1 Commenter's name and address added to distribution list.

NA_Franci-2 Commenter is identifying individual uses of the Russian River.

NA_Franci-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Franci-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Franci-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Franci-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Franci-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Franci-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Franci-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane. Martini-Lamb

CF/45-5.1-2 1 Russian River Estuary Management Project - Correspondence

GARY W. GALLOWAY
(Name: Please Print)

38 LUCKY DR
(Street Address)

GREENBRAE, CA. 94904
(Town) (Zip Code)

January, 2011

RR ADDRESS
19467 REDWOOD DR
MONTE RIO, CA

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Gallo-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and TUBING. NA_Gallo-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Gallo-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Gallo-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Gallo-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Gallo-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Gallo-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Gallo-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Gallo-9

Sincerely Gary W Galloway 1-11-11
(Signature) (Date)

Gary Galloway, January 11, 2011

NA_Gallo-1 Commenter's name and address added to distribution list.

NA_Gallo-2 Commenter is identifying individual uses of the Russian River.

NA_Gallo-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Gallo-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Gallo-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Gallo-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Gallo-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Gallo-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Gallo-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Getch

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 3 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Gary Getchell
(Name: Please Print)
21301 Monte Cristo Ave PO Box 159
(Street Address)
Monte Rio 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Getch-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and domestic water supply. NA_Getch-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Getch-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Getch-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Getch-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Getch-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Getch-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Getch-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Getch-9

Sincerely,

Gary Getchell 2-1-11
(Signature) (Date)

Gary Getchell, February 1, 2011

NA_Getch-1 Commenter's name and address added to distribution list.

NA_Getch-2 Commenter is identifying individual uses of the Russian River.

NA_Getch-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Getch-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Getch-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Getch-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Getch-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Getch-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Getch-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CARLA D. GRADY
(Name: Please Print)

8166 Park Ave.
(Street Address)

Forestville, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Grady-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well-being, for exercise and personal health, fishing, swimming, and _____. NA_Grady-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Grady-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Grady-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Grady-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Grady-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Grady-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Grady-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Grady-9

Sincerely,

Carla D. Grady 1/13/2011
(Signature) (Date)

Carla Grady, January 13, 2011

NA_Grady-1 Commenter's name and address added to distribution list.

NA_Grady-2 Commenter is identifying individual uses of the Russian River.

NA_Grady-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Grady-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Grady-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Grady-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Grady-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Grady-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Grady-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CARLA D. GRADY
(Name: Please Print)

8166 Park Ave.
(Street Address)

Forestville, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Grady-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well-being, for exercise and personal health, fishing, swimming, and _____. NA_Grady-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Grady-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Grady-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Grady-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Grady-6
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- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Grady-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Grady-9

Sincerely,

Carla D. Grady 1/13/2011
(Signature) (Date)

Barbara Greco Stephens, January 15, 2011

NA_Greco-1 Commenter's name and address added to distribution list.

NA_Greco-2 Commenter is identifying individual uses of the Russian River.

NA_Greco-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Greco-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Greco-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Greco-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Greco-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Greco-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Greco-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Eleanor Greig
(Name: Please Print)

2441 Carriage Place
(Street Address)

Napa, CA 94558
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Greig-1

I utilize the Russian River in the following way(s): property owner, ~~business owner~~, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, ~~fishing~~, swimming, and grandchildren recreation NA_Greig-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Greig-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Greig-4
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- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Greig-6
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- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Greig-9

Sincerely,

Eleanor Greig 1/12/11
(Signature) (Date)

Eleanor Greig, January 12, 2011

NA_Greig-1 Commenter's name and address added to distribution list.

NA_Greig-2 Commenter is identifying individual uses of the Russian River.

NA_Greig-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Greig-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Greig-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Greig-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Greig-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Greig-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Greig-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Robert C. Guastucci
(Name: Please Print)

14837 Cayan 7 Rd
(Street Address)

Rio Nido CA 95471
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Guast-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Guast-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Guast-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Guast-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Guast-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Guast-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Guast-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Guast-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Guast-9

Sincerely,

Robert Camillo Guastucci 1-11-11
(Signature) (Date)

Robert Guastucci, January 11, 2011

NA_Guast-1 Commenter's name and address added to distribution list.

NA_Guast-2 Commenter is identifying individual uses of the Russian River.

NA_Guast-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Guast-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Guast-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Guast-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Guast-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Guast-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Guast-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Guido

TELEPHONE 869-2770

PHILIP E. GUIDOTTI

(Name: Please Print)

P.O. BOX 256

(Street Address)

GUERNEVILLE, CA 95446-0256

(Town) (Zip Code)

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

13. January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Guido-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and RETIRED WATER UTILITY OWNER NA_Guido-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Guido-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Guido-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Guido-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Guido-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Enoch-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Guido-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Guido-9

Sincerely,

(Signature) 1/13/11 (Date)

27 yrs. FORMER CHAIRMAN OF RUSSIAN RIVER REC. DISTRICT

5 yrs FORMER MEMBER OF BOARD OF DIRECTORS SWEETWATER SPRINGS WATER DIST.

Phillip Guidotti, January 13, 2011

NA_Guido-1 Commenter's name and address added to distribution list.

NA_Guido-2 Commenter is identifying individual uses of the Russian River.

NA_Guido-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Guido-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Guido-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Guido-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Guido-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Guido-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Guido-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Susan J. Hale
(Name: Please Print)
168 Golden Hind
(Street Address)
Corte Madera 94925
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Hale-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Hale-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Hale-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Hale-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Hale-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Hale-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Hale-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Hale-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Hale-9

Sincerely,

Susan J Hale 1-11-11
(Signature) (Date)

Susan Hale, January 11, 2011

NA_Hale-1 Commenter's name and address added to distribution list.

NA_Hale-2 Commenter is identifying individual uses of the Russian River.

NA_Hale-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hale-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hale-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Hale-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Hale-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hale-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Hale-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Hales

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 1 0 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Martha S. Hales
29133 Willow Creek Road
Bridgehaven (Jenner), CA 95450

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Hales-1

As a property owner near Jenner, I love Russian River and kayak regularly on the river between Duncans Mills and the coast. My primary concern is with changing the minimum flow during normal years from 125 cubic feet per second (cfs) to 70 cfs in the lower Russian River. Flow reduction will seriously impede my enjoyment of the river . I am concerned not only for my recreational use of the river, but also for the overall health of the watershed, including impacts to other species such as amphibians, sea birds, seals, unlisted fish, etc. As we have seen in recent years, invasive species, including grasses and blue-green algae, flourish in times of low flow. I would like to see a broad range of water quality issues addressed that would result from diminished flows. NA_Hales-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Hales-3

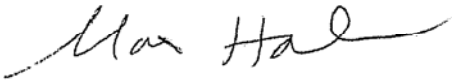
I would like to see continued environmental monitoring and analysis, including recreational, public health, and economic impacts of the project. Please assure me that this EIR will mitigate all potential impacts from this project. NA_Hales-4

Please address the following issues:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Hales-5
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Hales-6
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Hales-7
- When flows are lowered in dry years, the river mouth often stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Hales-8

- The preferred project maintains estuary levels at 8′. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Hales-9
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Hales-10

Sincerely,



Martha S. Hales

Mailing address:
1512 Willard Street
San Francisco, CA 94117

Martha Hales, February 11, 2011

NA_Hales-1 Commenter's name and address added to distribution list.

NA_Hales-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. As part of the environmental analyses for the proposed Estuary Management Project, the Draft EIR includes individual analysis of potential impacts to recreational resources and opportunities (Section 4.7, Recreation), biological resources including amphibians and seals (Section 4.4, Biological Resources), and Endangered Species Act-listed and unlisted fish species (Section 4.5, Fisheries). For additional discussion regarding water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses.**

NA_Hales-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hales-4 For a discussion regarding mitigation and compliance with a mitigation program, please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility,** in **Chapter 2, Master Responses. A**nalysis of public health issues is discussed in **Master Response 2.4 Water Quality**, in **Chapter 2, Master Responses**.

NA_Hales-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hales-6 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Hales-7 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Hales-8 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hales-9 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Hales-10 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Hall

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CAROL M. HALL
(Name: Please Print)
~~11796~~ 11796 Summer Home Park Rd
(Street Address)
Forestville, Ca 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. ~~Please put my name and address on your notification list for all meetings and documents related to this project.~~ NA_Hall-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and boating. NA_Hall-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Hall-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Hall-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Hall-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Hall-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Hall-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Hall-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Hall-9

Sincerely,

Carol M. Hall 1-12-11
(Signature) (Date)

Please do all that you can to protect our beautiful river. My family has been on the river since 1927

NA_Hall-1

Carol Hall, January 12, 2011

NA_Hall-1 The comment is consistent with other form letter comments, but strikes the request to include contact information in the Project distribution list. Pursuant to CEQA procedures, as a commenter to the Draft EIR, participant will receive a copy of the Final EIR and Responses to Comments document.

NA_Hall-2 Commenter is identifying individual uses of the Russian River.

NA_Hall-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hall-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hall-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Hall-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Hall-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hall-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Hall-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 21 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

EARL T. HEMMING
(Name: Please Print)
14488 OLD CAZ ROAD
(Street Address)
GUERNEVILLE CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Hemmi-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and ACCEP CONTAMINATION. NA_Hemmi-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Hemmi-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Hemmi-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Hemmi-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Hemmi-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Hemmi-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Hemmi-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Hemmi-9

Sincerely, Earl T. Hemming 01-20-11

(Signature) (Date)

Earl Hemming, January 10, 2011

NA_Hemmi-1 Commenter's name and address added to distribution list.

NA_Hemmi-2 Commenter is identifying individual uses of the Russian River.

NA_Hemmi-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hemmi-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hemmi-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Hemmi-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Hemmi-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Hemmi-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Hemmi-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Henri

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

ROY HENRICHS
(Name: Please Print)
P.O. BOX 2824 (16356 - 3RD STREET)
(Street Address)
GUERNEVILLE, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Henri-1

I utilize the Russian River in the following way(s): property owner, ~~business owner,~~ recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, ~~and~~ _____. NA_Henri-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Henri-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Henri-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Henri-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Henri-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Henri-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Henri-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Henri-9

Sincerely,

(Signature) 1/14/2011 (Date)

Roy Henrichs, January 11, 2011

NA_Henri-1 Commenter's name and address added to distribution list.

NA_Henri-2 Commenter is identifying individual uses of the Russian River.

NA_Henri-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Henri-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Henri-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Henri-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Henri-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Henri-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Henri-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Herr

Katie Blank

From: David Herr [dherr10@gmail.com]
Sent: Saturday, February 05, 2011 6:44 PM
To: estuaryproject
Subject: Estuary Project. Attention Jessica Martini-Lamb

2/5/11

The mouth of the Russian River should not be artificially and mechanically opened. This project and study should also be in conjunction with the low flow proposals and the two should be considered together. NA_Herr-1 NA_Herr-2

The mouth is impeded from functioning naturally due to a cement barrier which keeps the River and Estuary from opening and closing as it should.
As it did in the past when the Russian River was a world class fishery. NA_Herr-3

Artificially opening the mouth to prevent two or three structures from flooding in perpetuity makes no sense! Raise the structures which will allow the Estuary to function in a natural manner as do other natural River estuaries further North. It will also allow the estuary to be deeper which will protect fish from an already temperature impaired habitat. Mechanically opening the mouth is also destructive to bird and wildlife, particularly the Harbor Seals. NA_Herr-4 NA_Herr-5

As I previously mentioned this project should be considered with the low flow proposal as there is no purpose for one without the other. NA_Herr-6

I've lived on the Russian River since 1987. Every project the Water Agency has considered to "protect the fish" as well as state agencies has failed. The low flow proposal is the granddaddy of them all and one can't listen to the ridiculousness of it without getting a headache and giving up! Low flow will produce a further temperature impaired river and will result in the River being choked with invasive plants and harmful bacteria. NA_Herr-7 NA_Herr-8

If the purpose is to protect the fish why not focus on something that matters. How about condemning the recently approved gravel mining project in the Alexander Valley? (350,000 tons per year) Another project to provide "fish habitat". Give us a break! How about educating home owners that live on the river and enforcing rules that prohibit cutting down trees in the riparian corridor to have a view of the river. How about vineyard conversions in the watershed and construction that increases sediment in an already sediment impaired river. NA_Herr-9

Do something that matters for the fish. Use common sense and stop manipulating projects "for the fish" when in reality they're for the purpose of greater storage and increased water sales. Go ahead and push the sand around at the mouth it's meaningless. NA_Herr-10

Sincerely, David Herr

David Herr, February 5, 2011

NA_Herr-1 The resource analyses in Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures, include a discussion of impacts associated with channel creation. The proposed Estuary Management Project is intended to relieve some of the impacts associated with artificial breaching.

NA_Herr-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Herr-3 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Herr-4 The Estuary Management Project is intended to achieve primary objectives related to fisheries habitat and flood management. An Alternative Flood Management Alternative is presented in Draft EIR Chapter 6.0, Alternatives Analysis. For a discussion of the range of alternatives, refer to **Master Response, 2.5, Alternatives**, in **Chapter 2, Master Responses**.

NA_Herr-5 The “Setting” Section 4.4.2 and Table 4.4-3 (Draft EIR Section 4.4, Biological Resources, Pages 4.4-29 – 33) discuss the special-status wildlife species, including birds and harbor seals, with potential to occur within the study area. Potential short term impacts associated with disturbance to special-status fish and wildlife, including birds and harbor seals, and fish from machinery used to breach the barrier beach and create the lagoon outlet channel are disclosed in Impact 4.4.1, in Draft EIR Section 4.4, Biological Resources, and determined to be less than significant due to requirements stipulated in the Marine Mammal Protection Act IHA. Additionally, incorporation of Mitigation Measure 4.4.1a and 4.4.1b would minimize impacts to nesting birds. Please refer to Draft EIR Section 4.4, for analysis of potential impacts to birds.

NA_Herr-6 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Herr-7 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**, for discussion regarding the adaptive management process.

NA_Herr-8 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For additional discussion related to Draft EIR analysis of Estuary Management Project impacts to water quality including invasive plant and bacteria, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. Reduced minimum instream flow is addressed in the Draft EIR Chapter 5.0, Cumulative Analysis which concludes that recreational and water quality impacts associated with the Estuary Management Project, considered in conjunction with foreseeable effects associated with lowering flows, could result in cumulatively considerable impacts.

NA_Herr-9 The Draft EIR provides analysis and disclosure of potential physical environmental impacts associated with the proposed project. Analysis of other issues within the Russian River watershed, including those listed by the commenter, is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

NA_Herr-10 The project objectives driving the proposed Estuary Management Project are established in Draft EIR Chapter 1.0, Introduction, and are specific to provide enhanced rearing habitat for juvenile salmonids within the Russian River Estuary. The project objectives driving the proposed Estuary Management Project are established in Draft EIR Chapter 1.0, Introduction. For additional discussion, refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**.

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JOAN HOLZHAUSEN
(Name: Please Print)

11733 OAK RD
(Street Address)

FORESTVILLE, CA, 97530
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Holzh-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and family time together in beauty. NA_Holzh-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Holzh-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Holzh-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Holzh-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Holzh-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Holzh-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Holzh-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Holzh-9

Sincerely,

Joan Holzhausen 1-27-11
(Signature) (Date)

Joan Holzhausen, January 27, 2011

NA_Holzh-1 Commenter's name and address added to distribution list.

NA_Holzh-2 Commenter is identifying individual uses of the Russian River.

NA_Holzh-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Holzh-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Holzh-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Holzh-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Holzh-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Holzh-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Holzh-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Carol Irvine
(Name: Please Print)

11250 Vellutini Rd.
(Street Address)

Forestville 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Irvin-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and R. R. County Water District has wells @ Steelhead Beac NA_Irvin-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Irvin-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Irvin-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Irvin-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Irvin-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Irvin-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Irvin-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Irvin-9

Sincerely,

(Signature) 1-12-11 (Date)

Carol Irvine, January 12, 2011

NA_Irvin-1 Commenter's name and address added to distribution list.

NA_Irvin-2 Commenter is identifying individual uses of the Russian River.

NA_Irvin-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Irvin-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Irvin-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Irvin-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Irvin-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Irvin-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Irvin-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NORMA JELLISON
PO BOX 1636
BODEGA BAY CA 94923
(707) 875-3799
NJELLISON@SONIC.NET

January 14, 2011

Jessica Martini-Lamb
Sonoma County Water Agency
404 Aviation Blvd
Santa Rosa CA 95403
by email: Jessica.Martini.Lamb@scwa.ca.gov
and: estuaryproject@esassoc.com

Below are my comments on the Russian River Estuary Management Plan Draft EIR.

The DEIR inadequately assesses several impacts of the proposed Estuary Management Plan (EMP). By topical area my comments to that effect are:

Recreation Impacts:

Impacts on Recreation are inadequately assessed.

The criteria for assessing impacts in this section of the EIR is:
Restrict access to or the beneficial use of existing recreational sites or facilities.
Eliminate or modify an existing recreational resource so that it no longer satisfies the recreational use for a significant number of the users.

The document fails to acknowledge the existence of and assess the impacts of the EMP on Goat Rock State Beach, specifically the river side beach area. This riverside beach area is heavily used especially by families with children. NA_Jelli-1

Isn't it true that higher water levels, up to 9' in some locations, as posited in the EIR will inundate riverside beaches for the long periods of time that the lagoon is in place – up to 5 months? NA_Jelli-2

How is the loss of river side wading/swimming opportunities at Goat Rock State Beach not a significant impact to the many families with children who use the riverside beach area at Goat Rock State Beach exclusively due to the dangers of the ocean side area? NA_Jelli-3

Further, the document fails to identify the existence of and assess the impacts of loss of the beach below Rivers End used by Inn guests and residents of the houses on Burke Avenue. How is this loss not significantly impacted by the EMP? NA_Jelli-4

Doesn't inundation of these two riverside beach areas, prime areas right in the center of the lower lagoon management area, "restrict access to or the beneficial use of recreational sites or facilities; eliminate or modify an existing recreational resource so that it no longer satisfies the recreational use NA_Jelli-5

for a significant number of users?" Recall that over 4Million park visitors annually use the Sonoma Coast State Beaches – it is one of the most heavily used state parks in the system. NA_Jelli-5 cont.

The loss of Goat Rock State Beach riverside beach areas is even more significant loss than the EIR acknowledged private beach area loses because it is a PUBLIC access beach area. This river side beach area is arguably the only State Beach that is safe for children to wade and swim along the entire 10 mile length of the Sonoma Coast State Beach. All other State Beaches have only ocean side beach areas. Wouldn't this loss be a major and significant impact of this project for the duration of the project period May to October each year, which coincides with prime vacation periods? NA_Jelli-6

All of the above comments are applicable to these two areas as take outs for boaters and kayakers as inundation and changes to the beach contours will make these two areas, heavily used by the boating community to take out for picnics, to rest and to walk across the beach to the ocean side. Why aren't the impacts to recreation associated with boats/kayaks use of these 2 river side areas identified as significant unavoidable impacts of the project? NA_Jelli-7

Biological Resources

Pinnipeds, Specifically Harbor Seals

Impacts on the Harbor Seal colony are inadequately assessed. The conclusion that the impacts are reduced to less than significant by virtue of the Incidental Harassment Authorization (IHA) permit and its protocols is disputed.

Among the criteria for assessing impacts of this sections is:
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFG, USFWS, or NMFS; NA_Jelli-8

The Jenner Harbor Seal colony has been established on Goat Rock Beach at the mouth of the Russian River since 1974 - 34 years.

Of the 21+ Sonoma Coast Harbor Seal haul outs that constitute the Sonoma County Harbor Seal Census, the Jenner/Goat Rock haul out is the most significant. The Jenner colony is the largest and most significant Harbor Seal colony in Sonoma County and from Drakes Beach in Marin County to the mouth of the Eel River in Mendocino County. (Mortenson data)

Harbor Seals are colonial and have a large degree of site fidelity. Being diurnal, they haul out during the day. The haulout period is critical for metabolic processes (e.g. reoxygenation) that allow them to dive in cold ocean waters when they feed at nite, for bonding with pups, nursing pups and generally resting in a colony where there is safety in numbers. NA_Jelli-9

Harbor Seals are easily disturbed. Disturbances, whether natural by birds flushing or man induced harassment whatever the source – boats, beach walkers approaching too close, mechanical equipment associated with the project - interfere with the needed biological processes, rest and restoration.

The EIR documents the short time frame after a harassment incident that the Harbor Seals will return to the haul out site. However, what has been observed over time is short term incidences of harassment for

short periods of time. At no time over the years that breaching activities have been implemented has the river mouth been closed for more than one month maximum. NA_Jelli-9 cont.

The protocols of the IHA permit are intended to mitigate the impacts of harassment associated with the individual times mechanical breaching of the river and construction associated with creating the lagoon occurs.

These protocols CAN NOT and DO NOT mitigate the impacts of 1) the up to 15 times/year the colony can/will be disrupted by these actions nor 2) the up to 5 month closure of the river mouth.

Long term, chronic disturbances result in 1) reduced use of a site, 2) a shift to nocturnal rather than diurnal feeding, 3) reduced pup production and 4) site abandonment. (Allen lecture) NA_Jelli-10

Given the lack of assessment of the multiple times the colony will be harassed and disrupted in any given year, year after year of the project life (undefined as to length anywhere in the EIR document), in other words the long term impacts of the continual disturbances, how can the EIR claim protocols for individual harassment incidents reduce the long term impacts of the project to less than significant? NA_Jelli-11

Moreover, given the lack of assessment of the long term impacts of a 5 month closed mouth, how can the IHA Permit protocols be used to find the impacts of the project are less than significant based on the protocols? NA_Jelli-12

Isn't creating a closed mouth for 5 months and the associated long barrier beach which will result in multiple ongoing disturbances/harassment associated with beach walkers approaching the colony – ignoring the signs warning them to maintain the statutory distance and when no Seal Watch volunteers are present to interpret and maintain the statutory distance - "having a substantial adverse effect, either directly or through habitat modifications?" NA_Jelli-13

How can the protocols of the IHA Permit, intended for individual incidents of construction equipment and associated staff presence on the beach, be used as the basis for declaring these substantial adverse effects which were not assessed can be reduced to less than significant?

How can harassment protocols for short term impacts be suggested as mitigating the long term potential for loss of the colony associated with ongoing, continual, chronic disturbance/harassment of the colony and the likely resulting abandonment of the site? NA_Jelli-14

Birds

Impacts on birds are inadequately assessed.

The beach at Goat Rock State Beach is a colonial site. Not only does it provide a resting place for Harbor Seals, it provides a resting place for birds. At any one time, hundreds of gulls, terns, Brown Pelicans and/or cormorants rest on this beach. This is a community haulout! There are few places like this along the coast – large sandy beach area with access to both the river and the ocean. As such it is a very important site for birds to rest and preen, giving them access to the river and to the ocean to swim and to feed. Gulls nest on Haystack Rock, cormorants congregate on it and on the smaller rocks disbursed in the river. NA_Jelli-15

As with Harbor Seals, birds are easily disturbed. The major disturbance for birds is beach walkers whose approach results in flushing the birds. NA_Jelli-15 cont.

Why was no assessment made of the impacts of prolonged closure of the river mouth on the flushing of birds which rest on the beach as a necessary part of their metabolic processes? NA_Jelli-16

Regardless of whether flushing the birds is considered a take under the Federal Migratory Bird Treaty Act, isn't the fact that both equipment operation and beach alteration will increase flushing an impact of the project on species that inhabit/use the beach and are a part of the biological community of the beach? NA_Jelli-17

Water Quality

Impacts on Water Quality are inadequately assessed. NA_Jelli-18

An overarching criticism of the EIR is that it is not comprehensive as to assessing the impacts of modifying Decision 1610 and the EMP. Segmenting is illegal under CEQA and this bifurcating of the analysis of the two projects, which are intrinsically linked, is flawed. Lowered flows are necessary for successful sustained mouth closure. The BO does not and cannot supersede sate law and allow segmenting of the EIRs. A more robust comprehensive EIR should fully examine impacts to Water Quality from changes in inflows as well as from the EMP. NA_Jelli-19 NA_Jelli-20

The EIR concludes that since the Russian River is not listed under Clean Water Act as impaired for nutrients, current levels can serve as baseline for project as serving beneficial uses identified such as aquatic habitat and recreation.

In fact, nutrient levels can be too high for fish even though the River is not yet listed as impaired. NA_Jelli-21

Isn't it true that a Basin Plan standard is that nutrients must not exist that cause biostimulation of nuisance substances (algal blooms) and that there is more than enough evidence of algal blooms in recent years? NA_Jelli-22

Moreover, isn't the fact that the monitoring requirements associated with the Temporary Order that SCWA did not meet result in the North Coast State Water Resources Board Board arranging for their own nutrient testing this upcoming (2011) summer? NA_Jelli-23

The environmental costs of "low flow" must be balanced with the EMP. During low flow, water quality in the lower river deteriorates extensively with high bacteria readings, excessive nutrients and associated algal blooms and Ludwegia mats. This is another reason why the two should be studied in a single EIR. NA_Jelli-24

A comment in the EIR scoping session statements in the appendices: Dick Butler (NMFS) June 22, 2010 letter "*We believe that it is reasonable that the EIR for the Estuary Project consider the effects of flow changes associated with interim flow changes (associated with the TUC petitions) and use existing information to address the effects of these interim changes on the environment and resources such as recreation boating*." seems to argue further for a comprehensive EIR that addresses the proposed changes to Dec 1610 and the EMP. NA_Jelli-25

The lack of analysis of the impacts of the EMP created lagoon and associated water quality impacts on body contact sports (boating, swimming, wading) is troublesome. To the extent that these recreation uses remain viable in the lower river, given the EMP and the lowered flows, how will increased bacteria levels and nutrients impair these uses? NA_Jelli-26

Please advise how adverse water quality impacts such as increased temperature, increased bacteria counts, increased nutrients impact the many other fish species, invertebrates and vertebrates that use the lower river and for that matter the salmon that will be captive and supposedly benefiting from the other lagoon characteristics? NA_Jelli-27

Other Impacts Not Addressed. Inadvertent Impacts of the Project.

The EIR fails to assess the creation of a prey environment. A prolonged closed river mouth and the associated lagoon creates an attractive site for birds (osprey, gulls, cormorants, pelicans, terns) and river and marine mammals (river otters, Harbor Seals, Sea Lions) to prey on the salmon confined in the lagoon. NA_Jelli-28

What impact is likely to result from the broadcasting among the birds and mammals the source of readily accessible food – the salmon?

Sea Lions specifically are quick learners and able to telegraph the availability of prey. Sea Lions are voracious feeders, able to quickly decimate salmon, as exhibited at the Ballard Locks for example. We already see examples of feeding frenzies in the river by the above listed birds, often joined by pinnipeds. NA_Jelli-29

Wouldn't this “corral” exacerbate this situation and negate the entire project? What is the plan when this happens? Would we then be looking at takes to protect the salmon? NA_Jelli-30

What is the time horizon for this project? What is the time frame that will be used to determine if this is a successful project or a failure? How long will this effort be continued before alternatives not pursued are investigated and implemented – for example removal of the jetty, raising the housing/structures threatened by flooding, other alternatives not pursued? NA_Jelli-31

Unfortunately, no consideration is given to irreversible commitments of resources and the long term irreversible impacts of the project. A major concern is the long term impacts of this project on the entire estuary ecosystem and the potential irreversible nature of those impacts. This is especially of concern when taken into consideration with the still emerging understanding of the impacts of climate change and sea level rise. NA_Jelli-32

In closing, for the regulators and policy makers it must be asked how it is possible to reconcile that it is acceptable to take and alter a public resource – Goat Rock State Beach – a part of the commons owned by the citizens of California, to alter a State owned Beach, interfere with multiple state owned and state protected resources, alter the river and its recreational uses as well as access to the river for so many users who have few safe alternatives to enjoy the coast side environment. The loss of the Harbor Seal colony of 34 years duration at the mouth of the river, the loss of the inaugural volunteer program, Seal Watch, that was the genesis for Stewards of Slavianka now Stewards of the Coast and Redwoods are other collateral damage associated with this project. Again, in the face of the questionnable success of this effort, the question must be asked is it worth it? NA_Jelli-33 NA_Jelli-34

I submit these are all unacceptable in the face of the high likelihood the goals of this project will fail to be realized for a host of reasons. Unfortunately, many of the impacts are irreconcilable commitments of resources as well as irreversible.

Thank you for the opportunity to comment.

Norma Jellison

Norma Jellison, January 14, 2011

NA_Jelli-1 Recreational impacts, including access at Goat Rock State Beach during lagoon outlet channel creation and maintenance, is addressed in Draft EIR Section 4.7, Recreation, Impact 4.7.1, on page 4.7-8. The impact analysis is applicable to the entire Goat Rock State Beach area, and addresses the entire beach area.

NA_Jelli-2 Recreational impacts, including inundation of portions of riverfront beaches during the Lagoon Management Period, is addressed in Draft EIR Section 4.7, Recreation, Impact 4.7.1, on page 4.7-8.

NA_Jelli-3 It is not anticipated that wading or swimming opportunities at Goat Rock State Beach will be lost, and there is no substantial evidence presented in the comment to suggest recreation will be eliminated at this location.

NA_Jelli-4 The Draft EIR identifies expected water surface levels along the Estuary Study Area. Figure 3-4a shows the area along Burke Avenue as being inundated at the 9-foot water level. This area is included in the quantification of river front beach impacts in Impact 4.7.1, even though the specific location name is not explicitly listed.

NA_Jelli-5 Recreational impacts, including restricted access at Goat Rock State Beach during lagoon outlet channel creation and maintenance, is addressed in Draft EIR Section 4.7, Recreation, Impact 4.7.1. This response recognizes that Sonoma Coast State Beach is a heavily used state park. The Water Agency is required to comply with conditions stipulated in the Use Permit issued by California Department of State Parks, which limits the days that the Water Agency may conduct work on the beach. Weekends, holidays, and consecutive days on the beach are not allowed.

NA_Jelli-6 See response to comment NA_Jelli-5, above.

NA_Jelli-7 Refer to response to comment NA_Jelli-2 above. The Draft EIR Section 4.7, Recreation, specifically acknowledges that kayak and picnic stopover areas may be inundated during the lagoon management period (page 4.7-9).

NA_Jelli-8 Water Agency activities conform to the conditions and monitoring measures established in the NMFS IHA to avoid and minimize impacts on pinnipeds at the Jenner haulout. These measures are listed on Draft EIR pages 4.4-69 through 4.4-71 in Impact 4.4.1. The Estuary Management Project will require an IHA from NMFS and will incorporate the same conditions and monitoring measures. Mitigation Measure 4.4.8 details an adaptive monitoring plan that will be implemented in compliance with the NMFS IHA. Conditions are established in the IHA to avoid and minimize effects to harbor seals and their haulout, and all

activities associated with Estuary management are subject to these conditions. The Draft EIR considered the IHA, drafted by government scientists and regulators with the responsibility of species protection, which represents a reasonable approach for mitigating impacts and its provisions, were consequently adopted. Under this adaptive monitoring plan, seal counts will continue to be conducted at the Jenner haulout and nearby coastal and river haulouts. If monitoring indicates decreases in overall use at the Jenner haulout are correlated with increases in use at the three closest haulouts, the Water Agency will consult with NMFS and CDFG to alter the Estuary Management Plan such that the haulout site is maintained as a resource. The IHA does not allow long-term harassment or alteration of habitat conditions that would contribute to abandonment of the Jenner haulout. The IHA, drafted by government scientists and regulators with the responsibility of species protection, represents a reasonable approach for mitigating impacts and its provisions were consequently adopted, recognizing the criteria listed by the comment.

NA_Jelli-9 The Estuary Management Project proposes implementation of a lagoon outlet channel following formation of a barrier beach and closure of the river mouth. The potential long-term impacts of the Estuary management, including implementing the lagoon outlet adaptive management plan, on the harbor seal haulout at Jenner are disclosed in Draft EIR Section 4.4, Biological Resources, Impact 4.4.8. Disturbance phenomena to harbor seals can be complex. The best information available to the Draft EIR (page 4.4-71), where five years of monitoring supporting the conclusion were reviewed) allowed the Draft EIR to conclude that impacts would be less than significant.

NA_Jelli-10 See also response to comment NA_Jelli-8 above.

NA_Jelli-11 Refer to responses to comments NA_Jelli-8 and NA_Jelli-9 for a discussion of potential impacts that are disclosed in the Draft EIR relevant to the harbor seal colony and applicability of IHA measures.

NA_Jelli-12 Refer to responses to comments NA_Jelli-8 and NA_Jelli-9 for a discussion of potential impacts that are disclosed in the Draft EIR relevant to the harbor seal colony and applicability of IHA measures.

NA_Jelli-13 Refer to response to comments NA_Jelli-8 and NA_Jelli-9. The Estuary Management Project proposes implementation of a lagoon outlet channel following formation of a barrier beach and closure of the river mouth.

NA_Jelli-14 Please refer to responses to comments NA_Jelli-8 and NA_Jelli-9, and NA_Jelli-13.

NA_Jelli-15 Please refer to Draft EIR Section 4.4 Biological Resources, Impact 4.4.1 on page 4.4-68 for a discussion of the effects of the project on birds using haulout

areas. As stated on page 4.4-68: "Although flushing may increase the birds' energy demands, it is not expected to result in a substantial adverse effect on any special-status birds potentially present. The CEQA baseline for the proposed project includes frequent human-related disturbances within the outlet channel management area and access route."

NA_Jelli-16 Please refer to response to comment NA_Jelli-15.

NA_Jelli-17 Please refer to response to comment NA_Jelli-15. Please refer to Draft EIR Section 4.4, Biological Resources, page 4.4-59 for a discussion of the Migratory Bird Treaty Act and its consideration under CEQA.

NA_Jelli-18 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses,** for a discussion of water quality impacts and demonstration of range of impacts included in Draft EIR Section 4.3.

NA_Jelli-19 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jelli-20 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jelli-21 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding water quality impacts associated with the Estuary Management Project. Under CEQA, baseline conditions are considered the physical conditions at the time of the Notice of Preparation.

NA_Jelli-22 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding water quality impacts associated with the Estuary Management Project. Under CEQA, baseline conditions are considered the physical conditions at the time of the Notice of Preparation.

NA_Jelli-23 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding water quality impacts associated with the Estuary Management Project. The RWQCB is implementing water quality sampling on the mainstem Russian River irrespective of the Temporary Change Order. The Water Agency is sampling nutrients in the Estuary as part of the Temporary Urgency Change Order in 2011. The sampling plan was coordinated with NCRWQCB staff.

NA_Jelli-24 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jelli-25 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Refer to responses to comments G_DOW-6 and G_RRWPC-25 regarding the scoping letter from National Marine Fisheries Service.

NA_Jelli-26 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion regarding water quality impacts associated with the Estuary Management Project.

NA_Jelli-27 Draft EIR Section 4.5, Fisheries, includes a description of the common and special status aquatic species found in the Estuary, and characterizes the type of habitat provided by the Estuary. The Estuary provides habitat for a variety of fish species including salmonids and other important recreational fish species such as American shad and smallmouth bass. In terms of conservation, much attention is given to three Endangered Species Act-listed salmonid species that are known to occur in the Russian River watershed. These are Central California Coast steelhead (*Oncorhynchus mykiss*), California Coastal Chinook salmon (*O. tshawytscha*), and Central California Coast coho salmon (*O. kisutch*; NMFS, 2010). The Estuary is important for adult and juvenile passage for the three ESA-listed salmonids (NMFS, 2008). The Estuary provides an opportunity for smolts to acclimate to ocean conditions before migrating to the ocean, as well as potentially providing rearing habitat for steelhead and Chinook salmon. Draft EIR Section 4.5, Fisheries, quantifies that anticipated increase in potential available rearing habitat that would be created through lagoon conditions. It is expected that the Estuary Management Project will have a discernable environmental benefit and would further the goal of environmental protection through provision of 6,357 acre feet of potential rearing habitat in the Estuary from the mouth to Vacation Beach (Draft EIR page 4-21). Draft EIR Section 4.5, Impact 4.5.1, Habitat Availability, quantifies the expected increase in potential rearing habitat that would be made available through implementation of the Estuary Management Project. Impact 4.5.2, Habitat Quality, describes expected habitat conditions that would be made available through implementation of the Estuary Management Project.

NA_Jelli-28 For a discussion regarding CEQA analysis of the predator/prey relationship, refer to responses to comments G_NCRW-6 and G_RRWPC-45.

NA_Jelli-29 Please refer to responses to comments G_NCRW-6 and G_RRWPC-45.

NA_Jelli-30 Please refer to responses to comments G_NCRW-6 and G_RRWPC-45.

NA_Jelli-31 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. The Estuary Management Project is anticipated to occur through 2023, as specified in the Biological Opinion. Results of implementation will be recorded and reviewed to determine the appropriate adaptive management action that should be taken. Results of implementation will determine the timeframe for evaluating success or failure, or implementing other alternatives. The Water Agency is required to implement changes to its Estuary management practices. The Biological Opinion also required the Water Agency to prepare a Work Plan to study the potential effects of the jetty on natural processes, and consider other approaches to meet habitat objectives in the event that the Estuary Management Plan does not meet criteria established in the Biological Opinion, and identified in Draft EIR Chapter 2.0, Project Description.

NA_Jelli-32 Chapter 7.0, Other Topics Required by CEQA, includes a discussion of potentially irreversible and irretrievable commitments. The project would not have an effect on sea level rise. Sea level rise is addressed in Draft EIR Section 4.2, Hydrology and Flooding and Chapter 5.0, Cumulative Analysis, page 5-2.

NA_Jelli-33 Please refer to response to comment NA_Jelli-5.

NA_Jelli-34 No response or text revisions to the Draft EIR are necessary.

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Comment Letter NA_Jenni

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

MARA JENNINGS
(Name: Please Print)

9491 Champs Elysees
(Street Address)

Forestville 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Jenni-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and relaxing. NA_Jenni-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Jenni-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Jenni-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Jenni-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Jenni-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Jenni-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Jenni-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Jenni-9

Sincerely,

Mara Jennings 1-18-11
(Signature) (Date)

Mara Jennings, January 18, 2011

NA_Jenni-1 Commenter's name and address added to distribution list.

NA_Jenni-2 Commenter is identifying individual uses of the Russian River.

NA_Jenni-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jenni-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jenni-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**.

NA_Jenni-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Jenni-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jenni-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Jenni-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

June Jobin
(Name: Please Print)

8420 Park Ave
(Street Address)

Forestville, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Jobin-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Jobin-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Jobin-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Jobin-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Jobin-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Jobin-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Jobin-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Jobin-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Jobin-9

Sincerely,

June Jobin 1/17/11
(Signature) (Date)

June Jobin, January 24, 2011

NA_Jobin-1 Commenter's name and address added to distribution list.

NA_Jobin-2 Commenter is identifying individual uses of the Russian River.

NA_Jobin-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jobin-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jobin-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Jobin-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Jobin-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jobin-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Jobin-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 27 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

January 24 2011

Sonoma County Water Agency
c/o Ms Martini Lamb
404 Aviation Blvd
Santa Rosa CA 95403

RE Draft EIR on Estuary Project

Dear Ms Martini-Lamb

I am a 72 year old who has used the Russian River at Summer Home Park (SHP) near Healdsburg for all of those years. I was first "dipped" in the River, which is our tradition at the age of 2 weeks in June 1938. The River was in good shape back then.

Your Draft EIR does not study the effects on the river at SHP where I, my children and grandchildren swim and canoe. Why Not! NA_Johnc-1

Your draft ignores the fact that you could/or would not have any problem with an 8 foot depth in the Estuary. Why Not! NA_Johnc-2

You should redo or ammend the draft to include SHP river frontage and an 8 ft depth of the Estuary NA_Johnc-3

JOHN J JOHNCK
11941 HILLSIDE DR
FORRESTVILLE CA 95436

John Johnck, January 24, 2011

NA_Johnc-1 As described in the Draft EIR Chapter 2.0, Project Description, the geographic scope of the EIR includes the Estuary Study Area and maximum backwater area (upstream to Vacation Beach). Summerhome Park is located approximately 20 river miles upstream and direct environmental effects resulting from the Estuary Management Project are not expected to occur at this location. For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2 Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses.**

NA_Johnc-2 The Draft EIR considers a Reduced Project Alternative (8 foot maximum water level) in Chapter 6.0, Alternatives Analysis. As discussed in Section 4.2, Hydrology, of the Draft EIR, approximately 76 properties, 9 of which have structures or infrastructure, would be affected with water level maintained at 9 feet maximum. The Reduced Project Alternative (8 foot maximum water level) would achieve the primary project objectives of enhancing rearing habitat for juvenile salmonids, particularly steelhead, and managing Estuary water levels to minimize flood hazard.

NA_Johnc-3 Since the Draft EIR includes an explanation of geographic scope of analysis and considers an 8-foot water level alternative (Reduced Project Alternative), the Draft EIR complies with CEQA, and does not need to be amended or redone. **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**, for addition information.

DIANE JOHNSON
(Name: Please Print)

2503 Woodlake DR.
(Street Address)

Santa Rosa, CA 95405
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Johns-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and as part of a Pioneer (1852) family. NA_Johns-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Johns-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Johns-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Johns-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Johns-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Johns-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Johns-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Johns-9

Sincerely,

Diane Johnson — January 11, 2011
(Signature) (Date)

Diane Johnson, January 11, 2011

NA_Johns-1 Commenter's name and address added to distribution list.

NA_Johns-2 Commenter is identifying individual uses of the Russian River.

NA_Johns-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Johns-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Johns-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Johns-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Johns-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Johns-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Johns-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Jones

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Arline H. Jones
(Name: Please Print)

15935 Birkhofer Ct.
(Street Address)

Guerneville, CA. 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Jones-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Jones-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Jones-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Jones-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Jones-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Jones-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Jones-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Jones-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Jones-9

Sincerely,

Arline H. Jones 1/12/11
(Signature) (Date)

Arline Jones, January 12, 2011

NA_Jones-1 Commenter's name and address added to distribution list.

NA_Jones-2 Commenter is identifying individual uses of the Russian River.

NA_Jones-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jones-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jones-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Jones-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Jones-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Jones-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Jones-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 10 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Russian River Art Gallery
16200 First Street
on the Plaza
Guerneville, CA 95446
707-869-9099
Open
Winter/Spring:
Thurs-Mon: 11a-5p
Summer/Fall:
Mon-Sat: 10a-6p
Sundays: 11a-5p
www.russianriverartgallery.com

Please do not go for this closed Estuary Plan! Get the kid another job!! It will choke the river with algae and pollution. The fish the towns the people will all suffer!

andrew Karcie
869-5615

to SCWA
Jessica
Martini
Lamb
404 aviation
Blvd.
Santa Rosa
ca.
95403

NA_KarciA-1

Andrew Karcie, February 10, 2011

NA_KarciA-1 For a discussion regarding water quality relative to pollutant levels, health of fish and humans, and invasive plants, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 1 0 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Russian River Art Gallery

16200 First Street
on the Plaza
Guerneville, CA 95446

707-869-9099

Open
Winter/Spring:
Thurs-Mon: 11a-5p

Summer/Fall:
Mon-Sat: 10a-6p
Sundays: 11a-5p

www.russianriverartgallery.com

I strongly oppose the closed Estuary plan and Low Flow on the Russian River! It will cause severe algae growth, choke this River and make it very unhealthy for Fish & People. P.Karcie yahoo.com

to Jessica Martini-Lamb 404 aviation Blvd Santa Rosa ca 95403

NA_KarciP-1

NA_KarciP-2

P. Karcie, February 10, 2011

NA_KarciP-1 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_KarciP-2 For a discussion regarding water quality relative to pollutant levels, health of fish and humans, and invasive plants, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

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To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Russian River Art Gallery
16200 First Street
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707-869-[illegible]

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I strongly oppose the closed Estuary Plan and low flow on the Russian River. This will cause sevele algae growth and pollution - it will be bad for fish and people. [illegible] Karci
[illegible] 3552

to
Jessica Martini-Lamb
404 aviation Blvd
Santa Rosa
Ca. 95403

NA_KarciZ-1

NA_KarciZ-2

Karcie, February 10, 2011

NA_KarciZ-1 For a discussion of the relationship of the Estuary Management Project to river flows, see **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_KarciZ-2 For a discussion regarding water quality relative to pollutant levels, health of fish and humans, and invasive plants, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Kaufm

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Andrea Kaufman
(Name: Please Print)

14529 Redwood Lane
(Street Address)

Guerneville CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Kaufm-1

I utilize the Russian River in the following way(s): property owner, ~~business owner,~~ recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and spending time with my grand children NA_Kaufm-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Kaufm-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Kaufm-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Kaufm-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Kaufm-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Kaufm-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Kaufm-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Kaufm-9

Sincerely,

(Signature) 1/13/11 (Date)

Andrea Kaufman, January 13, 2011

NA_Kaufm-1 Commenter's name and address added to distribution list.

NA_Kaufm-2 Commenter is identifying individual uses of the Russian River.

NA_Kaufm-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Kaufm-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Kaufm-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Kaufm-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Kaufm-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Kaufm-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Kaufm-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

VIRGINIA KELLEY
(Name: Please Print)

19515 REDWOOD DRIVE
(Street Address)

MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Kelle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Kelle-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Kelle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Kelle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Kelle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Kelle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Kelle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Kelle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Kelle-9

Sincerely,

TIM SCHWARZER, POA'S TRUSTEE FOR VIRGINIA KELLEY

(Signature)

(Date)
18 JAN 2011

Virgina Kelley, January 12, 2011

NA_Kelle-1 Commenter's name and address added to distribution list.

NA_Kelle-2 Commenter is identifying individual uses of the Russian River.

NA_Kelle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Kelle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Kelle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Megan Steer

From: Jay K. [jayskennedy@live.com]
Sent: Monday, February 14, 2011 9:17 PM
To: estuaryproject; mannesob@gmail.com
Subject: No on bio project/cespool

Attention:

After reading a number of these documents it is obvious that they all say the same thing and were prepared by educated fools. The river is close to dead as is and why would poking at it like a science expirement help when it has been proven by Northern Counties, Oregon and Washington what actions it takes to restore a damaged river system. NA_Kenne-1

For the russian to recover it is simple and doesn't cost a billion dollars. There are organizatios like Wild Steelhead and Trout Unlimited that do this work for free or non-profit funded NA_Kenne-2

If we REMOVE THE CONCRETE WALL AT THE MOUTH and let the river return to a natural state of its own on its own and restore all major and small creeks that have been full of crap for over 30 years now. Then wild and hatchery fish would actually have a chance.

This plan you guys are proposing will do nothing but help invasive species thrive in a slow water crap lagoon, All the hatchery smolts will be eaten by birds and carp before the ever get close to the ocean. This is ridiculous and embarrising that someone would actually think this is a good idea. This is a waste of time and money and will do nothing but cause more damage. NA_Kenne-3

Compare the science of this plan to the restoration plans of the Klamath, Trinity, Smith, Chetco, Eel, Mad, Elk, Sixes, Rouque,Umpqua, Trask, Kilchis, Tillamook, Nehalem, and Nestucca Rivers etc. All coastal rivers that have a had thriving returns of fish just from cleaning out the creek beds that were damaged from development or logging. The examples are right in your face, whats the problem!!! NA_Kenne-4

This is a waste of time and money and will do nothing but cause more damage.
This is a waste of time and money and will do nothing but cause more damage.
This is a waste of time and money and will do nothing but cause more damage.
This is a waste of time and money and will do nothing but cause more damage.

Sicerely,
Jay S. Kennedy
Resident of Cazadero Ca. and Austin Creek

Jay Kennedy, February 14, 2011

NA_Kenne-1 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**. The Draft EIR includes the Russian River Biological Opinion by reference; the other estuary studies and examples are presented in research as part of the Biological Opinion.

NA_Kenne-2 No response or text revision necessary.

NA_Kenne-3 Study of jetty removal is considered as an alternative to the Estuary Management Project, as discussed in Draft EIR Chapter 6.0, The Draft EIR includes a comparison of alternatives to the proposed Estuary Management Project, as discussed in Draft EIR Chapter 6.0, Alternatives Analysis. It should be noted that the Water Agency is currently implementing a series of fish passage and habitat enhancement projects in several tributaries, as identified in Draft EIR Chapter 5.0, Cumulative Analysis in Table 5-2, page 5-21. It is determined that the beneficial effects to fisheries associated with the Estuary Management Project, considered in conjunction with beneficial effects to fisheries resulting from the fish passage and restoration projects, would be cumulatively beneficial effect to fisheries habitat.

NA_Kenne-4 Refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion on management of other river and lagoon systems in California.

From: Scott Kersnar [wskersnar@gmail.com]
Sent: Friday, February 11, 2011 9:53 AM
To: Jessica.Martini.Lamb@scwa.ca.gov
Cc: estuaryproject

Subject: QUESTIONS RE: PROPOSED RUSSIAN RIVER ESTUARY PROJECT

estuaryproject@esassoc.com

Jessica.Martini.Lamb@scwa.ca.gov

Sonoma County Water Agency

Attention; Jessica Martin-Lamb

PROPOSED RUSSIAN RIVER ESTUARY PROJECT

To Whom It May Concern,

I am concerned about the effect of the proposed Estuary Project mandated by the Biological Opinion (BO) issued by the National Marine Fisheries Service (NMFS). Because the resulting draft EIR for the project focuses only on the mouth of the River and not on the overall health of the stream, I question whether the project will have much success in attaining the beneficial affects envisioned by the BO. By narrowing the focus down to three fish species and drawing on experience with estuaries in streams that don't have the same physical conditions and water quality challenges, as the Russian River, the premises of the project are open to serious challenge. Below are some of my questions: NA_Kersn-1

1. Do the other streams cited as examples of successful estuary enhancement contain the significant upstream wastewater discharges released into the Russian River? If so, to what level is the wastewater in those cited streams treated? To what extent has the "fresh" water in the estuaries of those streams been impacted by insiltation and upstream damming? What tests have shown that the water in those estuaries provide a beneficial environment for juvenile salmonids that will can be replicated in a stream with significant upstream insiltation and wastewater discharges? What verification has been made that the proposed Russian River estuary can be expected to have a similarly beneficial environment at 70 cfs? Where toxicity from upstream sourced are anticipated from lower flows, how can the objectives of the BO be reconciled with that increased toxicity? NA_Kersn-2

2. Many questions have been raised about the engineering for the project, specifically as to the integrity of the proposed uncompacted sand barrier tasked with sustaining the estuary at the target depth while preventing flooding of low-lying Jenner dwellings. What NA_Kersn-3

assurances do you have that the proposed barrier will maintain sufficient integrity to maintain the desired salinity and water temperature to support juvenile salmonids? NA_Kersn-3 cont.

3. Why does the project not require removal of the existing jetty in order to reestablish the natural course of the river and thus of the natural structure of the estuary in a manner consistent with the stated rationale for the BO? NA_Kersn-4

4. Why does the project not consider raising flood-threatened Jenner dwellings? How does the project justify saving the unpermitted portions of those dwellings built on the lower portions of the river bank from flooding? NA_Kersn-5

5. Where the proposed project is in conflict with California Coastal Commission regulations -- as with the expected negative influence on recreational activities such as surfing -- what mitigation does the project envision to avoid flagrant violation of Coastal Commission protections? NA_Kersn-6

6. What is the justification for placing the welfare of juvenile salmonids in direct conflict with the preservation of the Jenner Harbor Seal haul-outs? NA_Kersn-7

7. Why does the project not require the Sonoma County Water Agency to actively cooperate with efforts to restore the Russian River tributaries that serve as the spawning grounds for salmonids? NA_Kersn-8

8. Why does the project do nothing to address negative impacts such as flooding, increased algae and health hazards on upstream beaches, -- Vacation Beach , for example? What studies have been done to verify that upstream degradation due to flow reduction will not undermine the project itself by ultimately reducing water quality in the proposed estuary? NA_Kersn-9

9. Where does NMFS show that its biological opinion was not shaped, driven and possibly invalidated by its own jurisdictional constraints and those of the SCWA? In other words, where do you demonstrate that the estuary project with all its "significant and unavoidable" negative impacts will have a net positive effect on juvenile salmonid survival absent also addressing such key issues as upstream insiltation and tributary restoration that require enlisting the active and complementary participation of other agencies and jurisdictions? NA_Kersn-10

It is a mistake to enact a project that ignores the overall health of the Russian River in pursuit of an estuary solution that fails to encompass all the contributing upstream issues that must be addressed if the project's objectives are to be sustained over time. Simply labeling likely negative outcomes "significant and unavoidable" does not excuse dismissing them when they point to flaws that invalidate key premises of the proposed project. NA_Kersn-11

Sincerely,

Scott Kersnar

17300 Watson Road

Guerneville CA 95446

Scott Kersnar, February 11, 2011

NA_Kersn-1 The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion. Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**, for a discussion on management of other river and lagoon systems in California.

NA_Kersn-2 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**, for a discussion on management of other river and lagoon systems in California. The Draft EIR Section 4.5, Impact 4.5.1, Habitat Availability, quantifies the expected increase in potential rearing habitat that would be made available through implementation of the Estuary Management Project. Impact 4.5.2, Habitat Quality, describes expected habitat conditions that would be made available through implementation of the Estuary Management Project. Discharge of treated wastewater is a component of almost every major tributary in California. For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Kersn-3 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses**, for a discussion of project design and the adaptive management process.

NA_Kersn-4 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a jetty study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Kersn-5 An Alternative Flood Management Alternative is presented and evaluated in Draft EIR Chapter 6.0 (Section 6.4.6), Alternatives Analysis. Additional analysis would be required if this alternative is pursued to determine the permit status of the structures, as well as potential physical environmental effects associated with raising or modifying the structures. For additional discussion regarding feasibility and uncertainty of outcomes of this alternative, refer **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Kersn-6 Please refer **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**, for a discussion of Coastal Act consistency and potential mitigation scenarios for recreational impacts.

NA_Kersn-7 Draft EIR Chapter 1.0, Introduction, provides a summary of the Russian River Biological Opinion and its requirements for the Water Agency to modify its estuary management activities to avoid jeopardizing salmon and steelhead listed under the Endangered Species Act. Harbor seals are protected under the Marine Mammal Protection Act, although they are not listed under the Endangered Species Act. Refer to responses to comments NA_Jelli-8 for a discussion of potential impacts that are disclosed in the Draft EIR relevant to the harbor seal colony and applicability of IHA measures.

NA_Kersn-8 Comment does not indicate specific efforts the Draft EIR should consider. The project presented in the Draft EIR is based on requirements in the Biological Opinion, which specifically address juvenile salmonid rearing habitat in the Estuary. The Estuary Management Project is proposed in parallel to a series of other restoration projects that collectively address issues challenging various life cycle phases of salmonids. It should be noted that the Water Agency is currently implementing a series of fish passage projects in several tributaries, as identified in Draft EIR Chapter 5.0, Cumulative Analysis in Table 5-2, page 5-21. It is determined that the beneficial effects to fisheries associated with the Estuary Management Project, considered in conjunction with beneficial effects to fisheries resulting from the fish passage and restoration projects, would be cumulatively beneficial effect to fisheries habitat.

NA_Kersn-9 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion regarding water quality, please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**. For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Kersn-10 The Draft EIR examines impacts related to the Estuary Management Project. It does not analyze the Russian River Biological Opinion. The Draft EIR Section 4.5, Impact 4.5.1, Habitat Availability, quantifies the expected increase in potential rearing habitat that would be made available through implementation of the Estuary Management Project. Impact 4.5.2, Habitat Quality, describes expected habitat conditions through implementation of the Estuary Management Project.

The Draft EIR Chapter 5.0, Cumulative Analysis, addresses upstream tributary restoration projects. It should be noted that the Water Agency is currently implementing a series of fish passage projects in several tributaries, as identified in Draft EIR Chapter 5.0, Cumulative Analysis in Table 5-2, page 5-21. It is determined that the beneficial effects to fisheries associated with the Estuary Management Project, considered in conjunction with beneficial effects to fisheries resulting from the fish passage and restoration projects, would be cumulatively beneficial effect to fisheries habitat. The Estuary Management Project is proposed in parallel to a series of other restoration projects that collectively address issues challenging various life cycle phases of salmonids.

The Draft EIR considers water quality within the Estuary, and the project's potential contribution to water quality degradation. The Estuary Management Project would not result in increased siltation upstream. The Draft EIR recognizes that siltation and sedimentation impair the Russian River. Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**.

NA_Kersn-11 Draft EIR Chapter 5.0, Cumulative Analysis evaluates the potential impacts associated with the Estuary Management Project in conjunction with impacts from other projects in the watershed that were recently completed or will occur in the foreseeable future. The purpose of the Draft EIR is to identify significant effects on the environment to enable decision makers to consider impacts in the decision-making process.

Comment Letter NA_Kolka

Carolyn Kolka
(Name: Please Print)
2331 Derby
(Street Address)
Berkeley 94705
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Kolka-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and a wonderful area to relax in. NA_Kolka-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Kolka-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Kolka-4
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Sincerely,

Carolyn Kolka Jan. 31, 2011
(Signature) (Date)

Carolyn Kolka, January 31, 2011

NA_Kolka-1 Commenter's name and address added to distribution list.

NA_Kolka-2 Commenter is identifying individual uses of the Russian River.

NA_Kolka-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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Comment Letter NA_Krame

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 21 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

JOHN F. KRAMER
(Name: Please Print)

1256 RIM OF THE REDWOODS RD
(Street Address)

SEBASTOPOL 95472
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Krame-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and icon of Sonoma County. NA_Krame-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Krame-3

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- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Krame-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Krame-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Krame-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Krame-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Krame-9

Sincerely,

John F. Kramer 1/11/2011
(Signature) (Date)

John Kramer, January 11, 2011

NA_Krame-1 Commenter's name and address added to distribution list.

NA_Krame-2 Commenter is identifying individual uses of the Russian River.

NA_Krame-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krame-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krame-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Krame-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Krame-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**.

NA_Krame-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Krame-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Steven Kriske
(Name: Please Print)
25 West Summit Drive
Emerald Hills, CA 94062
(Street Address)

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Krisk-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and canoeing. NA_Krisk-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Krisk-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Krisk-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Krisk-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Krisk-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Krisk-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Krisk-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Krisk-9

Sincerely,

(Signature) 1-14-11 (Date)

Steven Kriske, January 14, 2011

NA_Krisk-1 Commenter's name and address added to distribution list.

NA_Krisk-2 Commenter is identifying individual uses of the Russian River.

NA_Krisk-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krisk-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krisk-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Krisk-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Krisk-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krisk-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Krisk-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Krueg

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 14 2011

Cary Krueger
16200 Rio Nido Rd
Guerneville, CA 95446

Feb 11, 2011

Sonoma County Water Agency
Attn:Jessica Martini-Lamb
404 Aviation Blvd.
Santa Rosa, CA 95403

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Dear Ms. Martini-Lamb:

I wish to express my concern about the "Russian River Estuary Management Project: Draft Environmental Impact Report" released on Dec 15, 2010.Please put my name and address on your notification list for all meetings and documents related to this project. NA_Krueg-1

I utilize the Russian River as a property owner, recreationist, for spiritual well being, for exercise and personel health, and for swimming and fishing. NA_Krueg-2

I am concerned about the separation of the Estuary project from the "Fish Habitat flows and Water Rights Project". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threantened fish. NA_Krueg-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document."Low flow" is inexorably linked to the Estuary Project through the BO. Don't you think it tis wrong to devide the process? NA_Krueg-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects the river as far upstream as Vacation Beach. NA_Krueg-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through Sept.This project is only viable during drought years when water quality impacts would be greatest. Don't you think this should be analyzed in light of BO requirements? NA_Krueg-6
- The dungeous crab start their life in the estuary. Wouldn't the closing of the river mouth devastate this important resource & industry? NA_Krueg-7
- Isn't there a contradiction in trying to do something for the steelhead & coho in the Jenner estuary and allowing gravel mining in the middle reach Russian River, which impairs the fishes spawning grounds? NA_Krueg-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that dat for 2010 has not been made available to the Water Quality Control Board or the public.The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5yrs. Don't you think this is unacceptable. NA_Krueg-9

Sincerely,

Cary Krueger 2-11-'11

Cary Krueger, February 11, 2011

NA_Krueg-1 Commenter's name and address added to distribution list.

NA_Krueg-2 Commenter is identifying individual uses of the Russian River.

NA_Krueg-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krueg-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krueg-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Krueg-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Krueg-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Krueg-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Krueg-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 25 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Pat LaGrave
(Name: Please Print)
10849 Buena Vista Lane
(Street Address)
Forestville, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_LaGra-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_LaGra-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_LaGra-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_LaGra-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_LaGra-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_LaGra-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_LaGra-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_LaGra-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_LaGra-9

Sincerely, P.M. LaGrave 1/22/11
(Signature) (Date)

Pat LaGrave, January 22, 2011

NA_LaGra-1 Commenter's name and address added to distribution list.

NA_LaGra-2 Commenter is identifying individual uses of the Russian River.

NA_LaGra-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_LaGra-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_LaGra-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_LaGra-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_LaGra-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_LaGra-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_LaGra-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ROBERT E. LARSON
(Name: Please Print)

5623 DUPONT DRIVE
(Street Address)

SANTA ROSA, CA. 95409
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Larso-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Larso-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Larso-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Larso-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Larso-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Larso-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Larso-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Larso-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Larso-9

Sincerely,

Robert E. Larson 1/11/11
(Signature) (Date)

Robert Larson, January 11, 2011

NA_Larso-1 Commenter's name and address added to distribution list.

NA_Larso-2 Commenter is identifying individual uses of the Russian River.

NA_Larso-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Larso-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Larso-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Larso-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Larso-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Larso-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Larso-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Daniel J. Leer
(Name: Please Print)

201 Ridgevale Lane
(Street Address)

Pleasant Hill CA 94523
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Leer-1

I utilize the Russian River in the following way(s): ~~property owner~~, ~~business owner,~~ recreationist and/or tourist, ~~for artistic expression~~, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Leer-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Leer-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Leer-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Leer-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Leer-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Leer-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Leer-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Leer-9

Sincerely,

Daniel J. Leer — Jan 14 2011
(Signature) (Date)

Daniel Leer, January 14, 2011

NA_Leer-1 Commenter's name and address added to distribution list.

NA_Leer-2 Commenter is identifying individual uses of the Russian River.

NA_Leer-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Leer-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Leer-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Leer-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Leer-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Leer-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Leer-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 7 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Jack Long V.M.D.
(Name: Please Print)
5953 Russell Lane
(Street Address)
Forestville 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Long1-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Biking. NA_Long1-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Long1-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Long1-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Long1-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Long1-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Long1-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Long1-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Long1-9

Sincerely,

(Signature) 2/1/11 (Date)

Jack Long, February 1, 2011

NA_Long1-1 Commenter's name and address added to distribution list.

NA_Long1-2 Commenter is identifying individual uses of the Russian River.

NA_Long1-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long1-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long1-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2 Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Long1-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Long1-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long1-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Long1-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Long2

Joseph Long
PO Box 334
Monte Rio, CA 95462

(Name: Please Print)

20355 FOOTHILL DR.
(Street Address)

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Long2-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Canoeing. NA_Long2-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Long2-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Long2-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Long2-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Long2-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Long2-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Long2-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Long2-9

Sincerely,

Joseph J. Long Jr. 1-17-11
(Signature) (Date)

Joseph Long, January 17, 2011

NA_Long2-1 Commenter's name and address added to distribution list.

NA_Long2-2 Commenter is identifying individual uses of the Russian River.

NA_Long2-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long2-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long2-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Long2-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Long2-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Long2-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Long2-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

I own 2 properties:
14555 Canyon One
Rio Nido
+
15550 Canyon Three
Rio Nido

Lori & Stephen Lowe
(Name: Please Print)
P.O. Box 444
(Street Address)
NEWARK, CA 94560
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Lowe-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Lowe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Lowe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Lowe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Lowe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Lowe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Lowe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Lowe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Lowe-9

Sincerely, L. Lowe 1/12/2011
(Signature) (Date)

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

Lori & Stephen Lowe, January 19, 2011

NA_Lowe-1 Commenter's name and address added to distribution list.

NA_Lowe-2 Commenter is identifying individual uses of the Russian River.

NA_Lowe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Lowe-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Lowe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Lubbe

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Floyd and Joanne Lubbers
(Name: Please Print)
54 Rio Vista Way
(Street Address)
Petaluma CA 94952
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Lubbe-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and just enjoying the area (since 1927) NA_Lubbe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Lubbe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Lubbe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Lubbe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Lubbe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Lubbe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Lubbe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Lubbe-9

Sincerely,

Floyd and Joanne Lubbers
(Signature) (Date)

4th generation at the cottage
We are really concerned (there last years)
about the Russian River cutting the

Floyd & Joanne Lubbers, January 18, 2011

NA_Lubbe-1 Commenter's name and address added to distribution list.

NA_Lubbe-2 Commenter is identifying individual uses of the Russian River.

NA_Lubbe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Lubbe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Douglas Lumgair
(Name: Please Print)

17569 Orchard Ave
(Street Address)

Guerneville 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Lumga-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Lumga-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Lumga-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Lumga-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Lumga-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Lumga-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Lumga-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Lumga-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Lumga-9

Sincerely,

(Signature) 1/8/11 (Date)

Douglas Lumgair, January 8, 2011

NA_Lumga-1 Commenter's name and address added to distribution list.

NA_Lumga-2 Commenter is identifying individual uses of the Russian River.

NA_Lumga-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Lumga-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Lumga-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Lumga-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Lundq

Stella Lundquist
(Name: Please Print)
17455 Orchard Ave
(Street Address)
Guerneville CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Lundq-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and relaxing on my airmattress - it's the best! NA_Lundq-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Lundq-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Lundq-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Lundq-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Lundq-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Lundq-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Lundq-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Lundq-9

Sincerely,

Stella Lundquist 1-12-11
(Signature) (Date)

Stella Lundquist, January 12, 2011

NA_Lundq -1 Commenter's name and address added to distribution list.

NA_Lundq -2 Commenter is identifying individual uses of the Russian River.

NA_Lundq -3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Lundq -7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Lundq -8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Lundq-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

(Name: Please Print) JAMES L. MANCINI
2554 McAllister Street
San Francisco, CA 94118
(Street Address)

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Manci-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and general recreation. NA_Manci-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Manci-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Manci-4
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Sincerely,

James L Mancini 1/12/11

(Signature) (Date)

James Mancini, January 12, 2011

NA_Manci-1 Commenter's name and address added to distribution list.

NA_Manci-2 Commenter is identifying individual uses of the Russian River.

NA_Manci-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Manci-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Mr. Donald Martin
PO Box 125
Duncans Mills, CA 95430

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Marti-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and SURFING. NA_Marti-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Marti-3

Please address the issues below:

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- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Marti-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Marti-6
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Sincerely,

Donald Martin 2/10/11

(Signature) (Date)

COMMENT CARD

PUBLIC HEARING
DRAFT ENVIRONMENTAL IMPACT REPORT OF RUSSIAN RIVER ESTUARY MANAGEMENT PROJECT

The Jenner Community Center
10398 Highway 1 Jenner, CA
Tuesday, January 18th, 2011 6:00pm- 9:00 p.m.
(Please write legibly)

NAME	ADDRESS/EMAIL/PHONE NUMBER	ORGANIZATION	CHECK TO ADD TO MAILING LIST
	Mr. Donald Martin PO Box 125 Duncans Mills, CA 95430	SURFRIDER MEMBER RIVERKEEPER SUPPORTER. RIVER RESIDENT FOR 34 YEARS	

COMMENT:

SURFING, BEACHCOMBING & TRASH COLLECTING THIS STRETCH OF BEACH FOR 40 YEARS!

(1) AT THE FIRST JENNER PUBLIC HEARING I DISTINCTLY HEARD THE SPOKESMAN FROM NMFS ADMIT THAT THE PROPOSED PROJECT WOULD MOST LIKELY FAIL AND THAT THE BEST OPTION IS TO EITHER REMOVE MOST OF THE JETTY OR DO NOTHING. WHY DON'T YOU EXPOSE THE JETTY AND ALLOW THE RIVER TO FLUSH OUT A WIDER AND MORE SHALLOW MOUTH? AND SEE WHAT HAPPENS!! NA_Marti-10

(2) HOW WILL YOU "MITIGATE" THE LOSS OF THIS AREA AS ONE OF THE FINEST SURF BREAKS IN SONOMA COUNTY/CALIFORNIA? NA_Marti-11

(3) WHY AREN'T YOU CONSIDERING ALL THE TOTAL CUMULATIVE IMPACTS TAKING PLACE UPSTREAM, IE GRAVEL MINING, ILLEGAL DIVERSIONS, AGRICULTURAL BY-PRODUCTS, ETC.? NA_Marti-12

(4) HAS SUPERVISOR CARRILLO SHARED MY PLAN FOR JETTY REMOVAL THAT I DESCRIBED TO HIM IN PERSON? NA_Marti-13

I DON'T BELIEVE THAT THIS PROJECT WILL ACCOMPLISH ITS GOAL W/OUT CAREFUL CONSIDERATION OF THESE QUESTIONS. PLEASE LISTEN TO THE NUMEROUS VOICES OF EXPERIENCE THAT ARE WEIGHING IN ON THIS ISSUE.

THANK YOU,
Don Martin
DON MARTIN
2/10/11

Please return to a staff member of the Sonoma County Water Agency or mail to 404 Aviation Blvd. Santa Rosa, CA 94503 Attn: Jessica Martini-Lamb. Deadline for submitting comments is 5:00 p.m. February 14th, 2011.

Donald Martin, February 10, 2011

NA_Marti-1 Commenter's name and address added to distribution list.

NA_Marti-2 Commenter is identifying individual uses of the Russian River.

NA_Marti-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Marti-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Marti-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Marti-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Marti-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Marti-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Marti-10 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels.

This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Marti-11 Please refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

NA_Marti-12 Draft EIR Chapter 5.0, Cumulative Analysis, includes a cumulative analysis of some environmental effects of the Estuary Management Project that would be "cumulatively considerable", indicating that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The scope of the analysis includes other projects in the watershed that were recently implemented or could occur in the foreseeable future, including gravel mining and water quality impacts. Illegal diversions are known to occur on the Russian River, but are not well documented such that a substantial analysis could be performed.

NA_Marti-13 Please refer to response to comment NA_Marti-10.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

MAR 29 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2 Russian River Estuary Management Project

Art McNulty
(Name: Please Print)
15871 River Rd / P.O. B. 1734
(Street Address)
Guerneville, Ca. 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_McNul-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_McNul-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_McNul-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_McNul-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_McNul-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_McNul-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_McNul-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_McNul-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_McNul-9

Sincerely,

_____
(Signature) (Date)

Art McNulty, March 29, 2011

NA_McNul-1 Commenter's name and address added to distribution list.

NA_ McNul-2 Commenter is identifying individual uses of the Russian River.

NA_McNul-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_McNul-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_McNul-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_McNul-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_McNul-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_McNul-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_McNul-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Meade

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

EUGENE L. MEADE
(Name: Please Print)

8872 WINDSOR ROAD
(Street Address)

WINDSOR, CA. 95492-9227
(Town) (Zip Code)

13 January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Meade-1

I utilize the Russian River in the following way(s): ~~property owner, business owner~~, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Meade-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Meade-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Meade-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Meade-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Meade-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Meade-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Meade-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Meade-9

Sincerely,

EMeade 13 JAN 2011
(Signature) (Date)

Eugene Meade, January 13, 2011

NA_Meade-1 Commenter's name and address added to distribution list.

NA_Meade-2 Commenter is identifying individual uses of the Russian River.

NA_Meade-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Meade-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Meade-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Meade-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Meade-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Susan Meyer
(Name: Please Print)

155 Laidley St
(Street Address)

San Francisco CA 94131
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Meyer-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Meyer-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Meyer-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Meyer-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Meyer-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Meyer-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Meyer-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Meyer-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Meyer-9

Sincerely, S Meyer 1/18/11
(Signature) (Date)

Susan Meyer, January 18, 2011

NA_Meyer-1 Commenter's name and address added to distribution list.

NA_Meyer-2 Commenter is identifying individual uses of the Russian River.

NA_Meyer-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Meyer-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Meyer-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Meyer-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Meyer-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Meyer-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Meyer-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

GENEVIEVE MOLLER-DUCK
(Name: Please Print)
14520 REDWOOD LN
(Street Address)
GUERNEVILLE, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Molle-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Molle-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Molle-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Molle-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Molle-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Molle-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Molle-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Molle-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Molle-9

Sincerely,

Genevieve Moller-Duck 1-20-11
(Signature) (Date)

Genevieve Moller-Duck, January 20, 2011

NA_Molle-1 Commenter's name and address added to distribution list.

NA_Molle-2 Commenter is identifying individual uses of the Russian River.

NA_Molle-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Molle-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Molle-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Molle-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Molle-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Molle-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Molle-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_MurphC1

(Name: Please Print)
Charles J. Murphy
1321 Crown Dr.
(Street Address) Alameda, CA 94501

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_MurphC1-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_MurphC1-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_MurphC1-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_MurphC1-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_MurphC1-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_MurphC1-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_MurphC1-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_MurphC1-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_MurphC1-9

Sincerely,

Charles J. Murphy 25 JAN 11
(Signature) (Date)

Charles Murphy, January 8, 2011

NA_MurphC1-1 Commenter's name and address added to distribution list.

NA_MurphC1-2 Commenter is identifying individual uses of the Russian River.

NA_MurphC1-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphC1-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphC1-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_MurphC1-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_MurphC1-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphC1-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_MurphC1-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

SONOMA CO. WATER AGENCY 1-8-11
404 AVIATION BLVD 95403
JESSIA MARTINI-LAMB

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY
JAN 12 2011
To: Jeane; Martini-Lamb
CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

DEAR JESSICA:

I AM IN FAVOR OF CLOSING THE RIVER MOUTH TO BENEFIT THE YOUNG FISH. NA_MurphC2-1

FLOODING • AS FOR FLOODING BLDGS IN JENNER, WITH ALL THE MONEY SPENT DISCUSSING THE ISSUE, THOSE BLDINGS ARE A TRIVIAL CONCERN. RAISE THEM UP, TEAR THEM DOWN OR OTHERWISE DISPOSE OF THEM. THEY SHOULD NOT BE PART OF THE EQUATION. THE VISITORS CENTER NEEDS REPLACED ANYWAY. NA_MurphC2-2

DAM • THE IDEA OF MAKING A PATH THRU THE SAND WON'T WORK, ITS A DUMB IDEA. BUILD A PERMANENT DAM WITH REMOVABLE SECTION, ON OCT 15 REMOVE THE BLOCKAGE LET THE SALMON & STEELHEAD COME IN. PUT THE BLOCKING SECTION BACK THE FOLLOWING MAY 15. NA_MurphC2-3

~~SEALS~~ SEALS • SEALS ~~[illegible]~~ LEAVE WHEN THE SAND BARRIER FORMS THEY GO ELSEWHERE. THERE'S OF NO CONCERN. NA_MurphC2-4

COPY

LOW FLOWS

- THERE SHOULD BE NO REASON FOR LOW FLOWS, IF WE FORGET ABOUT THE DUMB BUILDINGS IN JENNER. LOW FLOWS AFFECT RECREATION, INCREASE CONTAMINATION OF BEACHES, INCREASE WEED GROWTH, AND ARE DETRIMENTAL TO THE ECONOMY OF THE ~~[illegible]~~ REGION, WHICH DEPENDS ON RECREATION. NA_MurphC2-5

- THE ABOVE IS FOR YOUR CONSIDERATION, ON MANAGING THE ESTUARY.

SINCERELY,

Charles J. Murphy

P.E. LICENSE # E6527

Charles J. Murphy
22731 Sylvan Way
Monte Rio, CA 95462-9742
PH 707 520 3025

Charles Murphy, January 25, 2011

NA_MurphC2-1 Commenter is in favor of closing the river mouth to benefit the fish. It should be noted that the proposed lagoon outlet channel will only be implemented following barrier beach closure and that mechanical closure of the barrier beach is not included as a project component. Please refer to Draft EIR Chapter 2.0, Project Description.

NA_MurphC2-2 Refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses.** Additional analysis would be required, if this alternative is pursued, to determine the permit status of the structures, as well as potential physical environmental effects associated with raising or modifying the structures. For additional discussion regarding feasibility and uncertainty of outcomes of this alternative, refer **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_MurphC2-3 For additional discussion regarding feasibility and uncertainty of outcomes of this alternative, refer **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**. Implementation of this type of a permanent dam with removable sections as an alternative is limited by substantial engineering, environmental, permitting, and other constraints. Without formal engineering feasibility and design review, it is speculative to determine whether a structure would function as intended, and with less environmental impacts than those identified for the proposed project. Please refer to Draft EIR Chapter 6.0, Alternatives Analysis, for alternatives considered.

NA_MurphC2-4 Comment asserts that there is no need for consideration to seals since they move locations when the barrier beach forms. The comment states that the seals are not impacted by the project and should not be considered in the Draft EIR. Please see Impact 4.4.1 and 4.4.8, beginning on pages 4.4-67 and 4.4-79, respectively, for a discussion on the potential project impacts to special status marine mammal, including seals.

Draft EIR Section 4.5, Biological Resources, includes analysis of short-term effects to harbor seals during creation of the lagoon outlet channel, as well as long-term effects of maintaining barrier beach conditions during the Lagoon Management Period. The general assertion of the comment concurs with the conclusions in the Draft EIR that there will be no significant impacts associated with lagoon outlet channel creation; however consideration of alteration of river conditions that could restrict interior river harbor seal haulout locations is considered significant.

NA_MurphC2-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

James A Murphy
(Name: Please Print)

168 Golden Hind Passage
(Street Address)

Corte Madera Ca 94925
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_MurphJ-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_MurphJ-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_MurphJ-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_MurphJ-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_MurphJ-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_MurphJ-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_MurphJ-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_MurphJ-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_MurphJ-9

Sincerely,

James A Murphy 1/11/11
(Signature) (Date)

James Murphy, January 11, 2011

NA_MurphJ-1 Commenter's name and address added to distribution list.

NA_MurphJ-2 Commenter is identifying individual uses of the Russian River.

NA_MurphJ-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphJ-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_MurphJ-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_MurphJ-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphJ-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_MurphJ-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

MICHAEL E. MURPHY
(Name: Please Print)

20564 Hwy 116
(Street Address)

MONTE RIO CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_MurphM-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and KAYAK + CANOEING. NA_MurphM-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_MurphM-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_MurphM-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_MurphM-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_MurphM-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_MurphM-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_MurphM-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_MurphM-9

Sincerely,

M. E. Murphy 1-11-2011
(Signature) (Date)

Michael Murphy, January 11, 2011

NA_MurphM-1 Commenter's name and address added to distribution list.

NA_MurphM-2 Commenter is identifying individual uses of the Russian River.

NA_MurphM-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphM-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphM-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_MurphM-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**

NA_MurphM-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_MurphM-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_MurphM-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

MAR - 3 2011

COPY

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Kenneth R. Myers
(Name: Please Print)

339 Cedar St
(Street Address)

Millbrae, CA. 94030
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Myers-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Myers-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Myers-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Myers-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Myers-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Myers-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Myers-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Myers-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Myers-9

Sincerely,

Kenneth R. Myers
(Signature)

February 28, 2011
(Date)

Kenneth Myers, February 28, 2011

NA_Myers-1 Commenter's name and address added to distribution list.

NA_Myers-2 Commenter is identifying individual uses of the Russian River.

NA_Myers-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Myers-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Myers-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Myers-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Myers-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Myers-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Myers-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Elizabeth Naegle
(Name: Please Print)
7365 Covey Rd
(Street Address)
Forestville, Ca 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Naegl-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and beauty. NA_Naegl-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Naegl-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Naegl-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Naegl-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Naegl-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Naegl-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Naegl-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Naegl-9

Sincerely,

Elizabeth Naegle 1-12-11
(Signature) (Date)

Elizabeth Naegle, January 12, 2011

NA_Naegl-1 Commenter's name and address added to distribution list.

NA_Naegl-2 Commenter is identifying individual uses of the Russian River.

NA_Naegl-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Naegl-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Naegl-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Naegl-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Naegl-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Naegl-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Naegl-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Narbu

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Anna Narbutovskih
(Name: Please Print)

14288 Woodland Dr.
(Street Address)

Guerneville 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Narbu-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Narbu-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Narbu-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Narbu-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Narbu-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Narbu-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Narbu-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Narbu-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Narbu-9

Sincerely,

Anna Narbutovskih 1/15/2011
(Signature) (Date)

Anna Narbutovskih, January 15, 2011

NA_Narbu-1 Commenter's name and address added to distribution list.

NA_Narbu-2 Commenter is identifying individual uses of the Russian River.

NA_Narbu-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Narbu-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Narbu-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Narbu-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Narbu-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Narbu-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Narbu-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Pete & Sandy Nesteroke
(Name: Please Print)
20290 River Blvd.
(Street Address)
Monte Rio, 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Neste-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and visual relaxation. NA_Neste-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Neste-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Neste-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Neste-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Neste-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Nestea-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Nestea-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Neste-9

Sincerely,

Pete Nesteroke 1/13/11
(Signature) (Date)

Sandra Nesteroke 1/13/2011

Pete & Sandy Nesteroke, January 13, 2011

NA_Neste-1 Commenter's name and address added to distribution list.

NA_Neste-2 Commenter is identifying individual uses of the Russian River.

NA_Neste-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Neste-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Neste-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Neste-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Neste-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Neste-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Neste-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

ROLAND NIEMCEWICZ
BESS NIEMCEWICZ
(Name: Please Print)
* 120 REDWOOD ROAD
17640 ORCHARD AVE., ~~GUERNEVILLE, CA~~
(Street Address)
* SAN ANSELMO, CA 94960
GUERNEVILLE, CA 95446
(Town) (Zip Code)
* = HOME
* = SUMMER

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Niemc-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and good neighbors. NA_Niemc-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Niemc-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process.!!! NA_Niemc-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. my neighborhood! NA_Niemc-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. ALREADY BAD NA_Niemc-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Niemc-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. to small NA_Niemc-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. + A DISSERVICE to the people of CALIFORNIA AND the lower RIVER in particular!! NA_Niemc-9

Sincerely,

Roland Niemcewicz
Bess Niemcewicz
(Signature)

1/11/2011
(Date)

Roland and Bess Niemcewicz, January 11, 2011

NA_Niemc-1 Commenter's name and address added to distribution list.

NA_Niemc-2 Commenter is identifying individual uses of the Russian River.

NA_Niemc -3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Niemc -4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Niemc -5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Niemc -6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Nienc-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Niemc -8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_ Niemc -9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

SPENCER NILSON
(Name: Please Print)

2011 LEAFGREEN DR.
(Street Address)

SANTA ROSA, CA 95405
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Nilso-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Nilso-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Nilso-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Nilso-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Nilso-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Nilso-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Nilso-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Nilso-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Nilso-9

Sincerely,

Spencer Nilson 1/17/11
(Signature) (Date)

Spencer Nilson, January 17, 2011

NA_Nilso-1 Commenter's name and address added to distribution list.

NA_Nilso-2 Commenter is identifying individual uses of the Russian River.

NA_Nilso-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Nilso-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Nilso-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Nilso-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Nilso-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Nilso-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Nilso-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

THOMAS J. O' CALLAGHAN
(Name: Please Print)
10801 OGBURN LN.
(Street Address)
FORESTVILLE, CA. 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_OCall-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and PROPERTY OWNER - SPIRITUAL well Being. NA_OCall-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_OCall-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_OCall-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_OCall-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_OCall-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_OCall-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_OCall-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_OCall-9

Sincerely,

Thomas J O'Callaghan JAN. 13, 11
(Signature) (Date)

Thomas O'Callaghan, January 13, 2011

NA_OCall-1 Commenter's name and address added to distribution list.

NA_OCall-2 Commenter is identifying individual uses of the Russian River.

NA_OCall-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_OCall-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_OCall-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_OCall-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_OCall-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_OCall-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_OCall-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Megan Steer

From: mcranch [mcranch@sonic.net]
Sent: Monday, February 14, 2011 4:22 PM
To: estuaryproject
Cc: Jessica.Martin.Lamb@scwa.ca.gov; Brenda S. Adelman
Subject: Comments of DEIR

Dennis O'Leary (Name: Please Print)

P.O.Box 251, (Street Address) 15800 Old Cazadero Rd.

Guerneville, CA 95446
(Town) (Zip Code)

February 14, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_OLear-1

QUESTIONS:

1. Why is the Sonoma County Water Agency (SCWA) the lead agency for this project?

SCWA appears to have an obvious conflict of interest here. Page 57 of the Biological Opinion (BO) identifies SCWA practices as likely causing part of the problem – (*The Water Agency stream channel maintenance, estuary maintenance and dam operations are likely to jeopardize and adversely modify critical habitat for endangered coho salmon and steelhead.*) This alone should bring into question whether SCWA can serve as a non partial lead agency. But furthermore, considering the fact that SCWA is in the business of supplying (selling) Russian River water to approximately 700,000 customers emphasizes the question; can the general public expect SCWA to over look it's own special interest and act as lead agency for this project? I think the State Water Resources Control Board should be the lead agency on this project. NA_OLear-2

2. Why wasn't Project Alternative "No Future Estuary Management" given serious consideration?

DEIR, 6.3.3 (page 482) "Project Alternatives", identifies this alternative and goes into several brief statements, supposedly explaining why this alternative was not considered. The reasons listed seem contrived and hardly justify dismissal of this alternative. The DEIR(page 582) says that breaches might occur that are uncontrolled, unpredictable and unsupervised… To that I say, so what, that is the nature of "nature".

As to the issue of flood management, there is no flooding problem around the estuary. I find no record of inhabited structures flooding in the estuary area, even during the highest winter floods. River front property owners should expect shoreline fluctuations throughout the year. It is unavoidable. Most likely all efforts to manage the estuary level will have limited success or fail (as in July, 2010). NA_OLear-3

Therefore:

Stop all mechanical and artificial breaching. Allow the estuary water surface level to rise and backup.

Historically, we know the river breaches the ocean sandbar at approximately 11 feet. Allowing this natural sequence of events will most likely provide the desired lagoon conditions more predictably and for longer durations than the proposed project described in the DEIR. NA_OLear-3 cont.

3. HB 885 – Effect of this Legislation on Jenner river front properties?

This legislation, passed in 2004, could have onerous implications for properties with septic systems within 600 feet of the river. I bring this up in the context that it makes no sense to protect estuary area septic systems from flooding if, in fact, the systems are in violation of current laws and face future compliance or abatement actions. Why wasn't this mentioned in the DEIR? NA_OLear-4

Thank You for the opportunity to comment on this DEIR.

Sincerely,

Dennis O'Leary

Dennis O'Leary, February 14, 2011

NA_OLear-1 Commenter's name and address added to distribution list.

NA_OLear-2 As established in CEQA Section 21067, "lead agency" means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. Similarly, if a project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency [CEQA Section 15051(a)]. Therefore, Water Agency is the correct Lead Agency under CEQA because the Estuary Management Project will be carried out by the Water Agency staff, funding, and direction.

NA_OLear-3 As noted by the commenter, the Draft EIR includes a discussion regarding the No Future Estuary Management Alternative. As discussed in Section 6.2 (page 6-4), according to CEQA Section 15126.6(f)(3), an EIR need not consider alternatives for which the effects cannot be reasonably determined and for which implementation is remote and speculative. The No Future Estuary Management Alternative is a potential alternative to the proposed Estuary Management Project; however based on preliminary review, was found infeasible, would not achieve the project objectives, would not substantially reduce impacts, or could incur new or more severe impacts than those associated with the proposed project. Therefore, it is not considered further. Refer to Draft EIR Chapter 6.0, Alternatives Analysis, and **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for additional discussion.

NA_OLear-4 The reference in the comment letter HB 885 refers to Assembly Bill 885, adopted in 2000 and codified in California Water Code Section 13290-13291.7, Chapter 4.5 Division directs the State Water Resources Control Board to adopt regulations for onsite wastewater treatment systems (septic systems). The regulations require septic tank owners to pay for inspections every five years, have a state certified laboratory analyst analyze well water for constituents every five years, and provide compliance documentation. For owners of systems within 600 feet of a surface water body that does not meet water quality standards, special requirements apply. Where existing septic systems have been identified by the NCRWQCB to be contributing to the water quality impairment (pollution) of specific surface water bodies, owners of septic systems within 600 feet of the impaired surface water body will be required to have a qualified professional determine whether the septic system is contributing to the impairment; and if so, retrofit the septic system with supplemental treatment[1].

1 State Water Resources Control Board (SWRCB), Proposed Regulations and Proposed Statewide Waiver for Onsite Wastewater Treatment Systems (OWTS) (Septic Systems), February 18, 2009.

SWRCB, with delegation to the NCRWQCB, is the implementing and enforcing agency for these regulations; the Water Agency does not have enforcement authority to regulate septic system owners along the Russian River.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

RIO OLESKY
(Name: Please Print)
6357 VAN KEPPEL RD
(Street Address)
FORESTVILLE 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Olesk-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Olesk-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Olesk-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Olesk-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Olesk-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Olesk-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Olesk-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Olesk-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Olesk-9

Sincerely,

Rio Olesky 1/14/11
(Signature) (Date)

Rio Olesky, January 14, 2011

NA_Olesk-1 Commenter's name and address added to distribution list.

NA_Olesk-2 Commenter is identifying individual uses of the Russian River.

NA_Olesk-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Olesk-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Olesk-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Olesk-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Olesk-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Olesk-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Olesk-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

JOHN & MARGARET OLDHAM
(Name: Please Print)

22945 CONIFER DR.
(Street Address)

MONTE RIO, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Oldha-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and enjoying wildlife. NA_Oldha-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Oldha-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document.. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Oldha-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Oldha-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Oldha-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Oldha-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Oldha-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Oldha-9

Sincerely,

John & Margaret Oldham Jan. 13, 2011
(Signature) (Date)

John & Mary Ann Oldham, January 13, 2011

NA_Oldha-1 Commenter's name and address added to distribution list.

NA_Oldha-2 Commenter is identifying individual uses of the Russian River.

NA_Oldha-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Oldha-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Oldha-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Oldha-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

HAROLD L. OLSON
(Name: Please Print)
P.O. BOX 2721
(Street Address)
GUERNEVILLE, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Olson-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Olson-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Olson-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Olson-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Olson-5
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- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Olson-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Olson-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Olson-9

Sincerely,

Harold L. Olson 1/19/11
(Signature) (Date)

Harold Olson, January 17, 2011

NA_Olson-1 Commenter's name and address added to distribution list.

NA_Olson-2 Commenter is identifying individual uses of the Russian River.

NA_Olson-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Olson-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

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NA_Olson-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 1 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

DENNIS O'RONKE
(Name: Please Print)

20580 RIVER BLVD.
(Street Address)

MONTE RIO, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_ORork-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_ORork-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_ORork-3

Please address the issues below:

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Sincerely,

Dennis O'Ronke 1-14-11
(Signature) (Date)

Dennis O'Rorke, January 14, 2011

NA_ORork-1 Commenter's name and address added to distribution list.

NA_ORork-2 Commenter is identifying individual uses of the Russian River.

NA_ORork-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_ORork-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 7 2011

Susan Packer
17340 Watson Rd_
Guerneville CA 95446

29 January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Packe-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and am an avid kayaker. NA_Packe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Packe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. I have personally witnessed algae grows increasing in the Lower Russian River due to low flow and am concerned about the health of the Lower River. NA_Packe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. The Ludwiggia and algae grows and lack of reportable testing of the quality of the water indicate that this is really a sham and not a project to save any fish. Low flows in the Klamath River resulted in the death of many fish- is this where we are heading? NA_Packe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Packe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Packe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Packe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Packe-9

Sincerely,

Susan J. Packer 29 Jan. 2011
(Signature) (Date)

Daniel Cirulli

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Susan Packer, January 29, 2011

NA_Packe-1 Commenter's name and address added to distribution list.

NA_Packe-2 Commenter is identifying individual uses of the Russian River.

NA_Packe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Packe-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Packe-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Packe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane. Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

MRS. SUSAN R. PAPPAN
(Name: Please Print)
16707 GUERNEWOOD RD
(Street Address)
GUERNEVILLE, CA. 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Pappa-1

I utilize the Russian River in the following way(s): property owner, ~~business owner~~, recreationist ~~and/or tourist~~, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and ~~to~~ KAYAKING—CANOEING. NA_Pappa-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Pappa-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Pappa-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Pappa-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Pappa-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Pappa-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Pappa-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Pappa-9

Sincerely,

Mrs. Susan R. Pappan Jan 12, 2011
(Signature) (Date)

Susan Pappan, January 12, 2011

NA_Pappa-1 Commenter's name and address added to distribution list.

NA_Pappa-2 Commenter is identifying individual uses of the Russian River.

NA_Pappa-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pappa-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pappa-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Pappa-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Pappa-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pappa-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Pappa-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

Jennell Parr
(Name: Please Print)
14675 Orchard Lane
(Street Address)
Guerneville, CA 95446
(Town) (Zip Code)

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Parr-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and living in a beautiful area. NA_Parr-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Parr-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Parr-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Parr-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Parr-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Parr-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Parr-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Parr-9

Sincerely,

Jennell Parr 1/13/11
(Signature) (Date)

Jannell Parr, January 13, 2011

NA_Parr-1 Commenter's name and address added to distribution list.

NA_Parr-2 Commenter is identifying individual uses of the Russian River.

NA_Parr-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Parr-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Parr-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Parr-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Parr-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Parr-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Mrs. R. L. Pedrazzini
(Name: Please Print)
15 Partridge Dr.
(Street Address)
San Rafael, Ca 94901
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Pedra-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and entertaining guests! NA_Pedra-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Pedra-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Pedra-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Pedra-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Pedra-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Pedra-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Pedra-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Pedra-9

Sincerely,

Mrs. Robert L. Pedrazzini 1-12-11
(Signature) (Date)

11330 Westside Avenue
Forestville, Ca. 95436
2nd Home

R.L. Pedrazzini, January 12, 2011

NA_Pedra-1 Commenter's name and address added to distribution list.

NA_Pedra-2 Commenter is identifying individual uses of the Russian River.

NA_Pedra-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pedra-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pedra-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Pedra-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Pedra-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Pedra-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Pedra-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 25 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project Correspondence

Raymond H Peterson
(Name: Please Print)
636 Gossage Ave
(Street Address)
Petaluma Ca 94952
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Peter-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Water Study. NA_Peter-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Peter-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Peter-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Peter-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Peter-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Peter-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Peter-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Peter-9

Sincerely,

1/21/11

(Signature) (Date)

Raymond Peterson, January 11, 2011

NA_Peter-1 Commenter's name and address added to distribution list.

NA_Peter-2 Commenter is identifying individual uses of the Russian River.

NA_Peter-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Peter-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Peter-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Peter-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Peter-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Peter-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Peter-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Petru

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 4 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

(Name: Please Print)

(Str

Ms. Linda Petrulias
23 Silvia Dr
Cazadero, CA 95421-9690

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Petru-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Petru-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Petru-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Petru-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Petru-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Petru-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Petru-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Petru-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Petru-9

Sincerely,

Linda Petrulias 2-3-11

(Signature) (Date)

Linda Petrulias, February 3, 2011

NA_Petru-1 Commenter's name and address added to distribution list.

NA_Petru-2 Commenter is identifying individual uses of the Russian River.

NA_Petru-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Petru-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Petru-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Petru-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 3 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Christine Philpitt
(Name: Please Print)

12510 Mays Cny Rd
(Street Address)

Guerneville, Ca 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Philp-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and visual beauty. NA_Philp-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Philp-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Philp-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Philp-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Philp-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Philp-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Philp-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Philp-9

Sincerely,

Christine Philpitt 1/26/11
(Signature) (Date)

Christine Philpitt, January 26, 2011

NA_Philp-1 Commenter's name and address added to distribution list.

NA_Philp-2 Commenter is identifying individual uses of the Russian River.

NA_Philp-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Philp-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Philp-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Philp-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

GLORIA POTTER
(Name: Please Print)

227 CENTER ST
(Street Address)

SAN RAFAEL CA 94901
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Potte-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and to visit friends. NA_Potte-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Potte-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Potte-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Potte-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Potte-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Potte-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Potte-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Potte-9

Sincerely,

Gloria Potter 1/12/11
(Signature) (Date)

Gloria Potter, January 12, 2011

NA_Potte-1 Commenter's name and address added to distribution list.

NA_Potte-2 Commenter is identifying individual uses of the Russian River.

NA_Potte-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Potte-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Potte-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Potte-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Potte-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Potte-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Potte-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Praeg

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

DOROTHY PRAEGER
(Name: Please Print)

21303 MONTE CRISTO AVE
(Street Address)

MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Praeg-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Praeg-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Praeg-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Praeg-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Praeg-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Praeg-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Praega-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Praeg-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Praeg-9

Sincerely,

Dorothy A. Praeger
(Signature) (Date)

Dorothy Praeger, January 18, 2011

NA_Praeg-1 Commenter's name and address added to distribution list.

NA_Praeg-2 Commenter is identifying individual uses of the Russian River.

NA_Praeg-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Praeg-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Praeg-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Praeg-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Praeg-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Praeg-8 Commenter is expressing preference for the Reduced Project Alternative.

NA_Praeg-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Puig

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CHERI K. PUIG
(Name: Please Print)

21541 STARRETT HILL DR., P.O. BOX 448
(Street Address)

MONTE RIO, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Puig-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and general enjoyment. NA_Puig-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Puig-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Puig-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Puig-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Puig-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Puig-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Puig-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Puig-9

Sincerely,

Cheri K. Puig 1-13-11
(Signature) (Date)

Cheri Puig, January 13, 2011

NA_Puig-1 Commenter's name and address added to distribution list.

NA_Puig-2 Commenter is identifying individual uses of the Russian River.

NA_Puig-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Puig-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Puig-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Puig-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Puig-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Puig-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Puig-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Mark Randall
(Name: Please Print)

172 Museum Way
(Street Address)

San Francisco, CA 94114
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Randa-1

I utilize the Russian River in the following way(s): property owner, ~~business owner~~, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Canoeing and Kayaking. NA_Randa-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Randa-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Randa-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Randa-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Randa-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Randa-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Randa-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Randa-9

Sincerely,

(Signature)

1·12·11
(Date)

Mark Randall, January 12, 2011

NA_Randa-1 Commenter's name and address added to distribution list.

NA_Randa-2 Commenter is identifying individual uses of the Russian River.

NA_Randa-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Randa-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Randa-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Randa-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Randa-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Randa-8 Refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Randa-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Elizabeth Reyna
(Name: Please Print)

7572 Blair Ave.
(Street Address)

Rohnert Park 94928
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Reyna-1

I utilize the Russian River in the following way(s): property owner (cabin), business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and connection to my "roots" NA_Reyna-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Reyna-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Reyna-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Reyna-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Reyna-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Reyna-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Reyna-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Reyna-9

Sincerely,

Elizabeth Reyna 1-19-11
(Signature) (Date)

Elizabeth Reyna, January 19, 2011

NA_Reyna-1 Commenter's name and address added to distribution list.

NA_Reyna-2 Commenter is identifying individual uses of the Russian River.

NA_Reyna-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Reyna-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Reyna-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Reyna-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Reyna-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Reyna-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Reyna-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Dr. Peter Riaboff
(Name: Please Print)

99 Keats Dr.
(Street Address)

Mill Valley CA 94941
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Riabo-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Riabo-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Riabo-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Riabo-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Riabo-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Riabo-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Riabo-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Riabo-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Riabo-9

Sincerely,

(Signature) 2/3/11 (Date)

Peter Riaboff, February 3, 2011

NA_Riabo-1 Commenter's name and address added to distribution list.

NA_Riabo-2 Commenter is identifying individual uses of the Russian River.

NA_Riabo-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Riabo-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Riabo-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Riabo-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Riabo-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Riabo-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Riabo-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Rose

SHARLENE ROSE
(Name: Please Print)

20196 ALDER RD
(Street Address)

MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Rose-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Rose-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Rose-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Rose-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Rose-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Rose-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Rose-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Rose-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Rose-9

Sincerely,

(Signature) 1/16/11 (Date)

Sharlene Rose, January 16, 2011

NA_Rose-1 Commenter's name and address added to distribution list.

NA_Rose-2 Commenter is identifying individual uses of the Russian River.

NA_Rose-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Rose-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Rose-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Rose-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Rose-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Rose-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Rose-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

BEV ROWE
(Name: Please Print)

19104 CHURCH ST
(Street Address)

MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Rowe-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Rowe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Rowe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Rowe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Rowe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Rowe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Rowe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Rowe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Rowe-9

Sincerely,

Bev Rowe 1/14/11
(Signature) (Date)

Bev Rowe, January 14, 2011

NA_Rowe-1 Commenter's name and address added to distribution list.

NA_Rowe-2 Commenter is identifying individual uses of the Russian River.

NA_Rowe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Rowe-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Rowe-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Rowe-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Rowe-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Rowe-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Rowe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

DOROTHY RUPPERT
WILLIAM RUPPERT
(Name: Please Print)

16024 FIFE CT
(Street Address)

GUERNEVILLE, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Ruppe-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Ruppe-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Ruppe-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Ruppe-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Ruppe-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Ruppe-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Ruppe-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Ruppe-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Ruppe-9

Sincerely,

Dorothy A. Ruppert 01-17-11
(Signature) (Date)

William E. Ruppert 01-17-2011

Dorothy & William Ruppert, January 17, 2011

NA_Ruppe-1 Commenter's name and address added to distribution list.

NA_Ruppe-2 Commenter is identifying individual uses of the Russian River.

NA_Ruppe-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ruppe-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Ruppe-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Ruppe-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Ruppe-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Ruppe-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Ruppe-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

George Rush
(Name: Please Print)
16046 Riverlands Rd.
(Street Address)
Guerneville, Ca.
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Rush-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and THE ENJOYMENT OF NATURE. NA_Rush-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Rush-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Rush-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Rush-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Rush-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Rush-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Rush-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Rush-9

Sincerely,

(Signature) 1-12-11 (Date)

George Rush, January 12, 2011

NA_Rush-1 Commenter's name and address added to distribution list.

NA_Rush-2 Commenter is identifying individual uses of the Russian River.

NA_Rush-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Rush-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Rush-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Rush-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Rush-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Rush-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 1 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

(N

The Nature Conservancy
Protecting nature. Preserving life.

Luann Schend
10507 Chalk Hill Rd
Healdsburg, CA 95448-9501

(St

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Schen-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Schen-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Schen-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Schen-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Schen-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010, when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Schen-6
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- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Schen-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Schen-9

Sincerely,

Luann Schend 1/30/11

(Signature) (Date)

Luann Schend, January 30, 2011

NA_Schen-1 Commenter's name and address added to distribution list.

NA_Schen-2 Commenter is identifying individual uses of the Russian River.

NA_Schen-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schen-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schen-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Schen-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Schen-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Schen-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Schen-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Schmi

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Linda Schmidt
(Name: Please Print)
P.O. Box 384
22936 Conifer
(Street Address)
Monte Rio, CA 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Schmi-1

I utilize the Russian River in the following way(s): property owner, ~~business owner~~, recreationist and/~~or tourist~~, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Schmi-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Schmi-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Schmi-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Schmi-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Schmi-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Schmi-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Schmi-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Schmi-9

Sincerely,

Linda Schmidt 1/12/11
(Signature) (Date)

Linda Schmidt, January 12, 2011

NA_Schmi-1 Commenter's name and address added to distribution list.

NA_Schmi-2 Commenter is identifying individual uses of the Russian River.

NA_Schmi-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schmi-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schmi-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Schmi-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Schmi-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Schmi-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Schmi-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Schub

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 27 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

JOHN C. SCHUBERT
(Name: Please Print)

P.O. BOX 2037
(Street Address)

GUERNEVILLE CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Schub-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and HISTORICAL RESOURCE. NA_Schub-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Schub-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Schub-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Schub-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Schub-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Schub-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Schub-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Schub-9

Sincerely,

John C Schubert 25 Jan 2011
(Signature) (Date)

John Schubert, January 25, 2011

NA_Schub-1 Commenter's name and address added to distribution list.

NA_Schub-2 Commenter is identifying individual uses of the Russian River.

NA_Schub-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schub-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Schub-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Schub-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Schub-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Schub-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Schub-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 1 0 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

E. Shen
(Name: Please Print)

21859 Russian River Dr.
(Street Address)

Villa Grande
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Shen-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Shen-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Shen-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Shen-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Shen-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Shen-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Shen-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Shen-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Shen-9

Sincerely,

(Signature) 2/5/2011 (Date)

E. Shen, February 5, 2011

NA_Shen-1 Commenter's name and address added to distribution list.

NA_Shen-2 Commenter is identifying individual uses of the Russian River.

NA_Shen-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Shen-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Shen-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

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NA_Shen-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Shen-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Shen-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Charles & Lindsey Shere
(Name: Please Print)

7500 Eastside Rd.
(Street Address)

Healdsburg 95448
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Shere-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and boating. NA_Shere-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Shere-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Shere-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Shere-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Shere-6
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- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Shere-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Shere-9

Sincerely,

Lindsey & Charles Shere 1/12/11
(Signature) (Date)

Charles & Lindsey Shere, January 12, 2011

NA_Shere-1 Commenter's name and address added to distribution list.

NA_Shere-2 Commenter is identifying individual uses of the Russian River.

NA_Shere-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

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NA_Shere-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Shere-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Sidbu

MERCY SIDBURY
(Name: Please Print)
4998 Vine Hill Rd
(Street Address)
Sebastopol CA 95472
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Sidbu-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Sidbu-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Sidbu-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Sidbu-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Sidbu-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Sidbu-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Sidbu-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Sidbu-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Sidbu-9

Sincerely, Mercy Sidbury 1/13/11
(Signature) (Date)

Mercy Sidbury, January 13, 2011

NA_Sidbu-1 Commenter's name and address added to distribution list.

NA_Sidbu-2 Commenter is identifying individual uses of the Russian River.

NA_Sidbu-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sidbu-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sidbu-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Sidbu-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Sidbu-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Sidbu-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Sidbu-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Megan Steer

From:	Carol Sklenicka [sklenicka.carol@gmail.com]
Sent:	Friday, February 11, 2011 4:31 PM
To:	estuaryproject
Cc:	Jessica
Subject:	Comment on Estuary Project DEIR
Importance:	High
Follow Up Flag:	Follow up
Flag Status:	Green
Attachments:	Comment on Estuary Project DEIR; ATT1570522.htm

Subject: Comment on Estuary Project addressed to:

To: estuaryproject@esassoc.com

Jessica.Martini.Lamb@scwa.ca.gov

From: Carol Sklenicka, PO Box 21, Duncans Mills, CA 95430

Sklenicka.carol@gmail.com

Please let me know you have received this comment.

Date: February 11, 2011

I am writing to comment on the Draft EIR recently issued by the Sonoma County Water Agency. As a resident of the lower river, I have watched with great curiosity as SCWA has attempted to manage the river mouth and estuary for the past several summers. What I have seen so far has every appearance of being nothing more than a trial-and-error experiment, with emphasis on the error. I believe the goal of creating a semi-fresh water estuary for the rearing of salmonids is and will be severely compromised by the failure of SCWA and other agencies and the general population to deal with the myriad other factors that have already harmed the health of the Russian River watershed. NA_Sklen-1

I am particularly concerned that the DEIR for the Estuary Project does not consider the impact of temporarily or permanently lowering river flows (D1610). There are several problems here. The need for low-flow to protect buildings in Jenner is not proven: the Estuary EIR states that water will not rise above 8 feet, which is not high enough to affect the lowest building in Jenner. (It is in fact absolutely absurd to think that the entire flow of a river might be adjusted to protect a handful of buildings in Jenner, but that is a side issue). The separation of the Estuary modification EIR from the low-flow EIR ignores abundant evidence that lowered river flow is destructive to the river's habitat for fish and other species as well as for recreation. The Regional Water Board has recently noted that there is inadequate data about water quality in the lower river; the EPA has also recently commented on the need for more NA_Sklen-2 NA_Sklen-3 NA_Sklen-4 NA_Sklen-5

specific water-quality data regarding the impact of urban run-off on California rivers in the delta watershed. NA_Sklen-5 cont.

To draft an EIR for modifications of the mouth of the river without considering the overall impact of raising the estuary level and of lowering flows in the middle river above Vacation Beach is a completely futile effort, potentially a harmful one. NA_Sklen-6 I urge you to start over from scratch with a full evaluation of all factors in the Russian River Watershed – including urban pollution, agriculture runoff and water use, silt, sediment, and stream alterations – that may have led to the demise of the salmon population. This expensive piecemeal effort -- could be far worse than doing nothing. It's unlikely to save salmon and it will have a negative impact on many other species as well as human enjoyment of the river above the estuary. NA_Sklen-7

Sincerely,

Carol Sklenicka

Carol Sklenicka, February 11, 2011

NA_Sklen-1 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Reponse**s for a discussion regarding the adaptive management process.

NA_Sklen-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sklen-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sklen-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Potential water quality impacts of the Estuary Management Project on fisheries are analyzed in Draft EIR Section 4.5, Fisheries, Impact 4.5.2. (beginning on page 4.5-22).

NA_Sklen-5 The comment states that the Regional Water Quality Control Board and Environmental Protection Agency have commented on the need for more water quality data for the lower Russian River and the impact of urban run-off on California rivers in the delta watershed, respectively. These comments are not directed to the Draft EIR for the Estuary Management Project. The letter from the Regional Water Quality Control Board, dated November 15, 2011, as letter referenced in the comment is directed toward the Fish Habitat Flows and Water Rights Project, not the Draft EIR for the Estuary Management Project. The Draft EIR does not include an analysis of potential violation of water quality objectives associated with the Fish Habitat Flows and Water Rights Project because it is a separate project. For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. As noted in Draft EIR Chapter 3.0, Project Background and Environmental Setting, the Water Agency implements biological and water quality monitoring as required by the Biological Opinion, and will continue to make this information available.

NA_Sklen-6 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sklen-7 The Draft EIR analyzes the effects of the proposed Estuary Management Project as required by CEQA. Analysis of all factors affecting fisheries within the watershed is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5 1-2 1 Russian River Estuary Management Project - Correspondence

Maryanne Sobieraj
(Name: Please Print)
90 Sequoia Ridge
(Street Address)
Cazadero 95421
(Town) (Zip Code)

11 January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Sobie1-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Sobie1-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Sobie1-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Sobie1-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Sobie1-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Sobie1-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Sobie1-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Sobie1-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Sobie1-9

Sincerely,

Maryanne Sobieraj — Jan 11, 2011
(Signature) (Date)

Austin Creek Alliance

Mary Anne Sobieraj, January 11, 2011

NA_Sobie1-1 Commenter's name and address added to distribution list.

NA_Sobie1-2 Commenter is identifying individual uses of the Russian River.

NA_Sobie1-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sobie1-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sobie1-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Sobie1-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Sobie1-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Sobie1-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Sobie1-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Mary Anne Sobieraj
90 Sequoia Ridge
Cazadero, CA 95421
February 5, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb,

This is regarding the Russian River Estuary Management Project: Draft Environmental Impact Report released on December 15, 2010.

The National Marine Fisheries Service's (NMFS) Russian River Biological Opinion (BO) mandated that the Water Agency should change its management of the estuary. Underlying, the BO are assumptions based on studies that indicate that coastal freshwater lagoons are optimal habitat for juvenile salmonids. "According to NMFS, fresh or brackish water lagoons at the mouths of many streams in central and southern California often provide depths and water quality that are highly favorable to the survival of rearing salmon and steelhead." The DEIR specifically cites studies by J. J. Smith on lagoons in Soquel, Pescadero, Pomponio, and Wadell Creeks. All of these have watersheds very unlike that of the Russian: They are much shorter and do not have the extensive agricultural and urban influence characteristic of the Russian. The DEIR then cites a NMFS study done on the Navarro River in 1998 that showed favorable estuary conditions for juvenile salmonids and mentions that both the Russian and Navarro estuaries are similar in size. Nowhere does it mention that the Navarro River has a very different watershed than that of the Russian: It is one fourth the length of the Russian; it does not have the urban influence nor the extensive agricultural influence and it does not have the influence of artificial management that is characteristic of the Russian. NA_Sobie2-1

Please answer the following questions:

- How can the SCWA justify a DEIR that is based on a faulty premise, i.e.. that the SCWA can create a freshwater lagoon at the mouth of the Russian similar to that of other freshwater lagoons on the California coast? NA_Sobie2-2
- What metrics will the SCWA use to determine the success or failure of this proposed management system? Or will this system be continued in perpetuity? NA_Sobie2-3
- The DEIR indicates an expected increase of bacteria and pathogen levels. Beach closures on the lower Russian during the low flows in 2009 indicate a positive correlation between elevated levels of *E. coli* and *Enterrococcus* and low flows. Shouldn't the SCWA determine what the effect of expected high levels of bacteria and pathogens will be on the juvenile salmonids that are expected to thrive in the proposed lagoon before they attempt this extensive project? NA_Sobie2-4
- The DEIR states that surface temperatures above 20^0C were measured in the lagoon in 2009 during the 29 day closure. Barnhart, in his article referenced in the DEIR (Barnhart, R.A., Species profiles: life histories and environmental requirements of coastal fishes and invertebrates (Pacific Southwest) - steelhead., U.S. Fish Wildl. Serv., Biol. Rep.82(11.60)), cites a study that indicates " a productive steelhead stream should have summer temperatures in the range of 10 to 15^0C and an upper limit of 20^0C." Another of his citations indicates an "upper lethal limit of 23.9^0C." In light of these studies, how can the SCWA justify listing an expected increased temperature in the proposed lagoon as a "less than Significant" impact? NA_Sobie2-5

- In the DEIR, page. 5-39: "Long-term implementation and increased duration of the freshwater lagoon may have significant adverse effects that, considered concurrently with other projects in the Russian River Watershed, may be cumulatively considerable." What are the possible cumulative effects referred to in the DEIR? Why aren't these cumulative effects discussed and evaluated? Why is this estuary management project being studied separately from other proposed projects upstream? NA_Sobie2-6 NA_Sobie2-7

Sincerely,

Mary Anne Sobieraj
Austin Creek Alliance

Mary Anne Sobieraj, February 5, 2011

NA_Sobie2-1 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Reponses** for a discussion on management of other river and lagoon systems in California. The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion.

NA_Sobie2-2 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses,** for a discussion on management of other river and lagoon systems in California. The Draft EIR includes the Russian River Biological Opinion by reference; other estuary studies and examples are presented in research as part of the Biological Opinion.

NA_Sobie2-3 Please refer to **Master Response 2.3, Project Feasibility,** in **Chapter 2, Master Responses** for a discussion regarding the adaptive management process as it relates to success criteria**.** Draft EIR Chapter 2, Project Description, describes the project purpose and objectives, including the Estuary water level management targets identified in the Russian River Biological Opinion.

NA_Sobie2-4 Please refer to **Master Response 2.4, Water Quality, in Chapter 2, Master Responses** for discussion on the effects of bacteria on fish health.

NA_Sobie2-5 Please refer to the discussion of water quality parameters, including temperature, considered for fish habitat in Draft EIR Section 4.5, Fisheries, Impact 4.5.2. (beginning on page 4.5-22).

NA_Sobie2-6 Comment cites statement on Draft EIR page 5-39, "Long-term implementation and increased duration of the freshwater lagoon may have significant adverse effects that, considered concurrently with other projects in the Russian River Watershed, may be cumulatively considerable." This statement appears under the Impact 5.2.7 heading as part of an analysis of the cumulative long-term impacts to biological resources and is intended as an introductory statement leading into a more detailed discussion of cumulatively considerable impacts related to natural vegetative communities, plants, amphibians, reptiles, marine mammals, jurisdictional waters and wetland habitat, and nursery sites and migratory corridors (Draft EIR pages 3-40 through 3-42).

NA_Sobie2-7 The cumulative analysis in Draft EIR Chapter 5.0 analyzed potential contribution of Estuary Management Project impacts considered cumulatively with other related projects. The projects considered are presented in Draft EIR Chapter 5.0 Cumulative Analysis, Table 5.1, page 5-5, and include other Russian River Instream Flow and Restoration Program elements and other projects within the watershed. For additional discussion of the relationship of the Estuary

Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Stephen Sobieraj
(Name: Please Print)

90 SEQUOIA Ridge Rd.
(Street Address)

CAZADERO 95421
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_SobieS-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and boating, dog walking. NA_SobieS-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_SobieS-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_SobieS-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_SobieS-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_SobieS-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_SobieS-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_SobieS-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_SobieS-9

Sincerely,

Stephen Sobieraj Jan. 17, 2011
(Signature) (Date)

Stephen Sobieraj, January 17, 2011

NA_SobieS-1 Commenter's name and address added to distribution list.

NA_SobieS-2 Commenter is identifying individual uses of the Russian River.

NA_SobieS-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_SobieS-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_SobieS-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_SobieS-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_SobieS-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_SobieS-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_SobieS-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 2 1 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

SORACCO
(Name: Please Print)
PO 127
(Street Address)
VILLA GRANDE 95486
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Sorac-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Sorac-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Sorac-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Sorac-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Sorac-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Sorac-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Sorac-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Sorac-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Sorac-9

Sincerely,

SORACCO 20 JAN 2011
(Signature) (Date)

Soracco, January 20, 2011

NA_Sorac-1 Commenter's name and address added to distribution list.

NA_Sorac-2 Commenter is identifying individual uses of the Russian River.

NA_Sorac-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sorac-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sorac-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Sorac-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Sorac-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Sorac-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Sorac-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

RECEIVED
FEB 11 2011
By

The Tree Climber
Darrell B. Sukovitzen
P.O. Box 849
Guerneville, CA 95446
(707) 887-1017
www.thetreeclimber.net—CCL #909691

February 8, 2011

Jessica Martini Lamb
Sonoma Count Water Agency
404 Aviation Blvd.
Santa Rosa, CA 95403

Re: Estuary Project DEIR

Dear Ms Lamb:

Enclosed are my comments for the Board.

1. Who will be responsible for monitoring any changes to the wave action at the mouth of the Russian River as a result of this project? NA_Sukov-1
2. What actions will be taken to avoid changes to the configuration of submerged sand and subsurface gravel, leading to changes in wave action? NA_Sukov-2
3. How frequent is the presence of surfers, human as well as in marine mammal form? NA_Sukov-3
4. Why has the pinniped monitoring done by Agency staff or by contract with Stewards of the Coast and Redwoods, including during the presence of sand-moving equipment, not been made available for public review prior to the close of public comment on the DEIR? NA_Sukov-4
5. Under contract, Joseph Mortenson, Ph.D. will be developing data on the pinniped population. Why will his data not be available for public review prior to the close of public comment on the DEIR? NA_Sukov-5
6. What studies have been done and what will be the effect on all sea life and bird populations as a result of this project? NA_Sukov-6
7. What studies have been done and what will be the effect on all land and aquatic plant life as a result of this project? NA_Sukov-7
8. What effects will this project have on the migratory cetacean population at the mouth of the River? NA_Sukov-8
9. Were the seals at the River mouth chased into the River by the equipment going past them? NA_Sukov-9
10. What studies have been done and what will be the effect on ebb and flow around Penny Island and on its full spectrum of habitat as a result of this project? NA_Sukov-10

11. What studies have been done and what will be the effect on salmonids and all sea populations migrating up Jenner Creek, Sheephouse Creek, Slaughterhouse Creek, Austin Creek, Willow Creek and Dutch Bill Creek as a result of this project? NA_Sukov-11
12. There are several islands in the River upstream from the mouth. What studies have been done and what will be the effect on these islands as a result of this project? NA_Sukov-12
13. Have you provided a complete list of all plant, bird and aquatic life in and around Jenner Marsh? What will be the effect on them as a result of this project? NA_Sukov-13
14. What is the current effect of intrusive predation on salmonid and other sea life in the estuary and upstream? What will the level of predation be as a result of this project, now and in the future? NA_Sukov-14
15. Silt runoff from vineyard production, and from other developments such as logging roads, over time makes its way to the estuary. Why has this not been included as part of the scenario addressed in this EIR? NA_Sukov-15
16. Many of the fertilizers and chemicals used by the public and the agriculture industry state on their material data sheets and risk assessment labels that they are harmful to aquatic life when they enter any stream. Why has this fact not been addressed in this EIR? What are the effects of these substances on salmonids? Why have you not, and will you, list all such chemicals in this EIR? NA_Sukov-16
17. If the jetty at the River mouth is removed or altered, how will this alter the proposed project? NA_Sukov-17
18. What will be the effect on red tides as a result of this project? How will the project be affected by red tides? NA_Sukov-18
19. What will be the effect on fluorescent algae as a result of this project? NA_Sukov-19
20. Has analysis been done of still water as part of the "mill pond" effect vs. cooler, rippling water and the effect on salmonids in the estuary and all the way to Vacation Beach? NA_Sukov-20
21. Has the effect of this project on summer dams and fish ladders been studied? NA_Sukov-21
22. What will be the effect of this project on proliferating invasive aquatic plant species? NA_Sukov-22
23. Why has the EIR not addressed the Alternatives Analysis regarding the introduction of fungicides, herbicides, and pesticides into the Russian River? NA_Sukov-23
24. In the 1980s. cinnabar tailings from the Sweetwater Springs mercury mine were used as backfill in the Russian River sewer project pipeline. Have there been any studies on the level of mercury possibly accumulating in the estuary? NA_Sukov-24
25. Has there been an analysis of the potential effect on this project of a chemical spill into the River? NA_Sukov-25
26. Has County/SCWA Counsel advised you that to do two separate EIRs on the River flow is called "piecemealing" and is illegal under CEQA? NA_Sukov-26

Thank you very much.

Sincerely,

Darrell B. Sukovitzen, Consulting Arborist
DS:kf

Darrell B. Sukovitzen
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FEB 11 2011
By

Estuary Project
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Sonoma West 5/4/2010

CTED REPRESENTATIVES

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ERS POLICY

's to the editor, but reserves the right to not exceed 300 words in length and type-referred. Letters must include the author's ber. Send letters to: Editor, Sonoma West bastopol, CA 95473. The e-mail address is elephone number is 823-7845, fax: 823-

chemicals used ... clearly state in their risk assessment labels and material safety data that they are toxic to fish and should not be used where drift and/or runoff would cause them to enter any stream. Sewage releases include pharmaceuticals and hazardous chemicals. Generations of improper logging operations have caused massive siltation issues; and there has been inflated development adjacent to these streams and tributaries, which in any case are currently too impaired to become salmon runs again. To focus on restoration of these waterways would be a better approach to bringing back to salmon.

At a recent scoping session in Jenner sponsored by SCWA, 5th District Supervisor Efren Carrillo seemed reluctant to discuss the question of what happens to the water that will not be going down the Russian River during the summer once the permanent low flow is established. The answer, of course, is that SCWA has oversold its contractual allotments for water to the cities and northern Marin. In turn the cities have issued building permits based on these assumptions.

One could extrapolate that endangering the harbor seals and their pups is good for business for SCWA, allowing them to sell yet more water.

Darrell B. Sukovitzen is a Forestville resident and award-winning environmentalist. To find out more, go to thetreeclimber.net.

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are a global village
orld economy. We
space, cyberspace
other's bad days.

It still takes almost a day to get from Sebastopol to France and I look forward to that delightful moment after flying all night when you push up the window shade and the sun is coming up over what must be Ireland and then England and then there's the English Channel and a swath of green farmland and brown and white cows and stone farmhouses with blue shutters.

I'm still in love with foreign travel. I know people whose long careers had them flying so much that once they retire they are thrilled to hang out in their own home. Not me. I get giddy just thinking about going to another part of the world. We're traveling with another couple and we've been playing at going to France since winter, munching on brie and poring over maps. If you only have two weeks to actually be there, you want to stretch it out with a long countdown. We have French radio streaming from our laptops, Paris weather on the Google map. ... by Gertrude Stein, MFK Fisher and Julia Child.

The world has shrunk since those Americans discovered France as a second home. Travel was more exotic and distancing then. Now we are a global village with a world economy. We share airspace, cyberspace and each other's bad days. Each of us is only a ripple away from another part of the world's failed economy, earthquake, oil spills, violence, corruption, wars and retaliatory attacks.

We may be separated by culture and language – my French, as they say, (heh, heh) est pathetique – but we know each other. The storybook farmers we will pass in the Dordogne worry about holding on to their fields just like California farmers. The chic people we will ogle on the Right Bank likely fret over cutbacks at work and how to keep their apartment.

To them we will bring our tourist dollars, affection and empathy.

Susan Swartz is an author and journalist in Sebastopol. You can also read her at www.juicytomatoes.com and hear her Another Voice commentary on KRCB-FM radio on Fridays. Email is susan@juicytomatoes.com.

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may 27, 2010

Sonoma West Times & News

TO THE EDITOR

Rosa POA, Santa Rosa PMA, Rohnert Park POA, Petaluma POA, Cotati PMA, Cotati POA and the Latino Peace Officers Association in supporting Jill Ravitch for D.A. We are the "cops" that provide law enforcement services to the citizens of Sonoma County. We are the law enforcement officers who have a solid understanding of what we need in a District Attorney to keep our county safe. We see that is Jill Ravitch.

Please join me and the other "cops" of Sonoma County in voting for Jill Ravitch for District Attorney on June 8.

Bill Focha
President
Sonoma County Deputy Sheriffs' Association

Crtical D.A.

EDITOR: I am a retired Deputy District Attorney. During my 20 year career, I was honored for winning cases involving sex crimes, domestic violence and homicides against women and children. I have worked with both D.A. candidates. They are both my friends.

It is critically important that the District Attorney have the support and respect of the law enforcement agencies. Jill Ravitch has that respect. A good D.A. can inspire police officers to do their best work for vulnerable victims. Jill knows that the search for truth and justice does not end when a case is filed. She can also tell the sheep from the goats, which is important in an era of crashing budgets.

I have supported Stephan Passalacqua in the last two elections. He is an amiable public servant and he has always treated me with respect, But the D.A. cannot be a mere politician. Jill Ravitch has the courage, wisdom, intelligence and experience needed to face the future challenges. It is time for a change.

Donna Lee Ryan
Santa Rosa

Farmers markets

EDITOR: We have just returned from Santa Barbara for a few days of sun and beach time to celebrate my birthday. As always, we took in the Saturday downtown farmers market. What a delight as usual. There is just fresh vegetables and fruits and berries from the farmers and wonderful flowers, as well. No arts and crafts booths, no prepared food booths, no toy booths, just an array of fabulously fresh food to prepare and eat at home. How refreshing to communicate with the farmers, feel their connection with Mother Earth and enjoy choosing produce reflecting this reciprocal nurturing/nurtured connection. Perhaps, our local farmers markets could use this gem of a mar-

GUEST COMMENTARY

SCWA vs. harbor seal pups: The water grab

by Darrell B. Sukovitzen

Once again the Sonoma County Water Agency has come up with a boondoggle of a venture that entails harassment and perhaps "incidental" kills of harbor seals at the mouth of the Russian River. The impetus for this proposal is a mandate called the Biological Opinion produced by the National Marine Fisheries Service. The project is intended to create a rearing ground in the estuary for threatened salmonid species. It involves dramatically dropping the river flow in summer to create a millpond of the estuary; heavy equipment on the beach (chasing the seals away) will create a sandbar with a small V-shaped outlet for overspill. According to Bill Hearn, primary author of the Biological Opinion, "We expect some toxic waters to form." Does this mean that a "take" permit must also be required for steelhead die-off as it has been for harassment and take of marine mammals and their pups?

The proposal completely overlooks the rest of the estuary's forms of life. According to Dian Hardy, founder of SealWatch, "In what I'm learning to call the Humpty Dumpty School of Resource Management, in order to save three salmonid runs, agencies — federal, state and county — appear willing to overlook the totality of the ecology found at the mouth of the Russian: the harbor seal haulout, a resting and foraging site for migratory birds and a fishery that includes Dungeness crabs, amongst other species."

It is interesting to me that the data collected from the $90,000 contract between SCWA and Stewards of the Coast & Redwoods for monitoring the seals will not be available for public review in time for comment during the EIR process. Also in this contract, it is stated that in the event of disturbance or harm to harbor seals or pups during heavy equipment use on the beach, Stewards is only to report in writing to SCWA, who in turn will report in writing to NOAA, for input on what to do. This is not a satisfactory method of dealing with what could be urgent situations.

Some of the real causes of salmonid demise are decidedly not being addressed by this Biological Opinion, such as vineyard production next to streams, tributaries and the main stem of the river

Darrell Sukovitzen, February 8, 2011

NA_Sukov-1 The Water Agency will be responsible for most monitoring efforts associated with the Estuary Management Project. Formal monitoring requirements related to wave action at the mouth of the river during the Lagoon Management Period is not required. As noted in Draft EIR Section 3.2, Estuary Management, wave and tidal action is dynamic and influenced by a number of variables. Average monthly wave energy changes with the seasons; wave energy is greatest in winter, reduces over spring, and is minimal from July to September. However, late spring storms, early fall storms and Southern Hemisphere storms can occasionally produce waves exceeding 10 feet in the vicinity of the river mouth during the Lagoon Management Period. Swell waves with periods longer than 10 seconds from either the northwest or south are often the cause of closure during the management period. Large wave events are particularly likely to cause closure when they coincide with the reduced tidal exchange that occurs approximately every two weeks during neap tides.

NA_Sukov-2 For a discussion related to mitigation for recreation refer to **Master Response 2.6 Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Response.** It should be noted that wave and tidal action is dynamic and influenced by other forces aside from the Estuary Management Project. Please refer to response to comment NA_Sukov-1, above.

NA_Sukov-3 The Water Agency does not have formal data regarding surfer (human) use at the Russian River mouth. Marine mammal data, specifically harbor seals, is collected through the Water Agency's annual biological and water quality monitoring effort. Draft EIR Chapter 3.0, Project Background and Environmental Setting summarizes the active Estuary monitoring programs (page 3-8). Draft EIR Section 4.5, Biological Resources provides additional baseline information about seal presence at the various haulouts in the project area (page 4.4-16 through 4.4-20). The potential for occurrence of listed marine mammals was addressed in Table 4.4-3. The comment does not indicate any deficiency or question about the adequacy of the analysis or mitigation measures contained in the Draft EIR.

NA_Sukov-4 The Water Agency annual biological and water quality monitoring reports, 1996 through 2000, prepared by Merritt Smith Consulting, have been published and are part of the Agency's administrative record (as listed below). The Water Agency and Stewards of the Coast and Redwoods partnered in 2009 to develop monitoring data to comprise the Incidental Harassment Authorization (IHA) application and permit. The IHA, as well as all other monitoring data and reports are publicly available and part of the Water Agency's administrative record. The following documents relating to pinniped monitoring were included in References Section 4.4.5.

Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 1996*, Annual Report, February 21, 1997.

Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 1997*, Second Annual Report, February 5, 1998.

Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 1998*, Third Annual Report, March 15, 1999.

Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 1999*, Fourth Annual Report, March 24, 2000.

Mortenson, J. 1996. Human interference with harbor seals at Jenner, California, 1994-1995. Prepared for Stewards of Slavianka and Sonoma Coast State Beaches, Russian River/Mendocino Park District. July 11. 1996.

Mortenson, J. and E. Twohy. 1994. Harbor seals at Jenner, California, 1974-1993. Prepared for Prepared for Stewards of Slavianka and Sonoma Coast State Beach, California Department of Parks and Recreation, Duncans Mills, CA.

National Marine Fisheries Service (NMFS), *Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation District in the Russian River Watershed*¸ September 24, 2008.

National Marine Fisheries Service (NMFS), *Incidental Harassment Authorization (IHA)*, March 30, 2010. 2010c.

Sonoma County Water Agency (SCWA) and Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 2000*, Fifth Annual Report, June 12, 2001.

Sonoma County Water Agency (SCWA) and Stewards of the Coast and Redwoods, *Russian River Estuary Management Activities – Pinniped Monitoring Plan*, prepared by Jessica Martini-Lamb, Sonoma County Water Agency, and Michele Luna and Joe Mortenson, Stewards of the Coast and Redwoods, September 9, 2009a.

Stewards of the Coast and Redwoods (Stewards) and Sonoma County Water Agency (SCWA), Harbor Seals at Jenner and at Peripheral Sites, Presentation, April 2010a.

Sonoma County Water Agency (SCWA), *Request for Marine Mammal Protection Act Incidental Harassment Authorization: Russian River Estuary Management Activities*, July 2009.

Sonoma County Water Agency (SCWA), Russian River Estuary Management Activities, Pinniped Monitoring at Jenner Haulout Counts, unpublished data and photographs, July 1, 2010b.

Data provided in these documents were considered in the biological resources analysis. These documents were available during the Draft EIR comment period by request as part of the administrative record, and are still available, by request, at the Sonoma County Water Agency.

NA_Sukov-5 The Draft EIR uses the best available information at the time the Draft EIR was written. Several documents, listed in response to comment NA_Sukov-4 prepared on pinniped populations in the Russian River Estuary were reviewed and discussed in the Draft EIR. Please refer to **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis,** in **Chapter 2, Master Responses**.

NA_Sukov-6 Potential effects to biological resources, including sea life and bird populations, including review of available information, is provided in Draft EIR, 4.4, Biological Resources. As discussed in Draft EIR Section 4.4.1, Introduction, on page 4.4-1 of the Draft EIR, several sources of information were used to assess the existing conditions and potential impacts that could occur on biological resources, focusing on terrestrial, aquatic, and wetland resources, with implementation of the project. These sources included resource studies and reports prepared for the Estuary, as well as information obtained from conservation and planning documents prepared for lands within the vicinity of the Estuary, and presented the methods and results of vegetation classification and mapping and terrestrial and wetland plant and animal surveys. In addition, the U.S. Fish and Wildlife Service, California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) Electronic Inventory were reviewed to identify special-status species known to or having the potential to occur in the project vicinity. Project Impacts on biological resources present or potentially present were addressed in Section 4.4, Biological Resources, beginning on page 4.4-5 of the Draft EIR for the creation and maintenance of the lagoon outlet channel, and beginning on page 4.4-75 of the Draft EIR for the long-term lagoon adaptive management.

NA_Sukov-7 Refer to response to comment NA_Sukov-6, above.

NA_Sukov-8 The Draft EIR considered the potential for special status species, including cetaceans, to occur within the study area in Table 4.4-3 on pages 4.4-32 and 4.4-33 of Section 4.4, Biological Resources. All of the special status cetaceans evaluated in Table 4.4-3 were deemed unlikely to occur within the study area due to the absence of suitable habitat.

NA_Sukov-9 Water Agency artificial breaching activities have followed the conditions and monitoring measures established in the Incidental Harassment Authorization issued by NMFS to avoid and minimize impacts on pinnipeds at the Jenner haulout. These measures are listed on Draft EIR pages 4.4-69 through 4.4-71, and have been established to minimize disturbance to pinnipeds.

NA_Sukov-10 Refer to response to comment NA_Sukov-6. Additionally, in Draft EIR Section 4.4, Biological Resources Figure 4.4.1 on page 4.4-7 shows the vegetation communities on Penny Island within the study area. Impact 4.4.6 on pages 4.4-75 through 4.4-77 addresses the potential impact of the long-term adaptive management plan on sensitive natural communities within the study area. Impact 4.4.7 on page 4.4-78 addresses the potential impact of the long-term adaptive management plan on special-status plant species within the study area.

NA_Sukov-11 As described in Chapter 2.0, Project Description, the Water Agency proposes to modify Estuary management in order to reduce marine influence (high salinity and tidal inflow) and promote a higher water level in the Estuary (formation of a fresh or brackish water lagoon) from May 15 to October 15. The Water Agency will continue the historical practice of artificially breaching the barrier beach outside the Lagoon Management Period (October 16 to May 14) to minimize the potential for flooding of low-lying properties. Anadromous species that occur in the Estuary (with a focus on special-status species) are described, with reference to timing of migration and life-stage habitat requirements, in Draft EIR Section 4.5, Fisheries (pages 4.5-4 to 4.5-14). Additionally, as described in Section 4.5.4 (Approach to Analysis, Section 4.5 Fisheries, pages 4.5-17 to 4.5-19) the timing of the project is considered unlikely to affect: Green sturgeon, Longfin smelt, Russian River tuleperch, Clear Lake-Russian River roach, hardhead, and Lamprey. Salmonids (addressed under Impact 4.5.2, Section 4.5, Fisheries, page 4.5-22 et seq.) typically immigrate upstream following winter storms outside the proposed management period, when the Estuary would be open due to natural or artificial breaching. With respect to outmigration of Chinook and coho smolts, Water Agency monitoring data in 2009 and 2010 indicate the timing of outmigration varies year to year, but that in most years the peak of the run may be expected between mid-April and mid-May, generally before the beginning of the Lagoon Management Period.

Additionally, as described under Impact 4.5.1 (Chapter 4, Section 4.5, Fisheries, page 4.5-19 et seq.), Estuary management to promote freshwater lagoon conditions would increase the frequency, duration and volume of freshwater storage within the Estuary during the Lagoon Management Period, thereby increasing potential habitat availability for juvenile salmonids. As, as concluded in the EIR, the project will be unlikely to result in adverse impacts to migratory fish populations.

NA_Sukov-12 Please refer to response to comment NA_Sukov-10. Islands, or gravel bars, within the Estuary Study area are mapped in Draft EIR Chapter 3.0, Project Background and Environmental Setting, including mapping of anticipated 7 and 9 foot water levels. It is anticipated that higher water levels will reduce the gravel beach area around individual islands. Draft EIR Section 4.7, Recreation, estimates the total gravel bar area in the Estuary Study Area is comprised of

approximately 27 acres; 24 acres, or 97 percent of the mapped beach area, is anticipated to be inundated at a 9 foot water level. Inundation associated with higher water levels would reduce the amount of beach acreage available within the Estuary, and these conditions would occur for a longer duration, depending upon performance of the outlet channel. At 9 feet, beach area would remain present at most gravel bar locations, and riverside access to these gravel bars would still be available. CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project (CEQA Guidelines, Section 15204, subd[a]).

NA_Sukov-13 Refer to response to comment NA_Sukov-6. In addition, the Draft EIR adequately assessed the special-status species known within the project vicinity (Section 4.4, Tables 4.4-2 and 4.4-3) and evaluated each special-status species for its potential to occur in the Estuary given the habitat requirements of each species relative to the observed existing conditions and results of previous biological resources studies (refer to special-status plants discussion beginning on page 4.4-22 of the Draft EIR and special-status animals discussion beginning on page 4.4-43 of the Draft EIR). CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project (CEQA Guidelines, Section 15204, subd[a]).

NA_Sukov-14 As described in Chapter 2.0, Project Description, the Water Agency proposes to modify Estuary management in order to reduce marine influence (high salinity and tidal inflow) and promote a higher water level in the Estuary (formation of a fresh or brackish water lagoon) from May 15 to October 15. As described in general Section 4.5 (Chapter 4.0), and in detail under Impact 4.5.1 (Chapter 4.0, Section 4.5, pp. 4.5-19 et seq.), the ecological benefits of lagoon habitat for salmonids (and especially rearing steelhead) have been documented extensively. Please refer to response to G_RRWPC-45 regarding potential predation risk to salmonids. There is no substantial evidence to indicate that intrusive predation would be significantly altered as a result of the project.

NA_Sukov-15 The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the Estuary Management Project. Potential impacts related to sedimentation are discussed in Draft EIR Section 4.3, Hydrology. As noted in Section 4.3, Hydrology, the Estuary Management Project would not create or contribute to sedimentation within the Estuary. Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**, and response to comment NA_Burge-1.

NA_Sukov-16 Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses.** This response recognizes that fertilizers and chemicals affect aquatic life when discharged to streams. The Draft EIR does not address specific

fertilizers and chemicals used by the public and agricultural industry; the Estuary Management Project does not require use of fertilizers or chemicals, nor will it result in new sources of discharge of fertilizers or chemicals. The purpose of this Draft EIR is to disclose the potential environmental effects of the project on the physical environment. The use of fertilizers or chemicals in the Russian River Watershed is an existing condition that would not be affected by the project. Therefore, an exhaustive list of all fertilizers or chemicals used within the watershed is not included in the Draft EIR.

NA_Sukov-17 As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a study plan to analyze the effects of the Russian River Estuary jetty on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

NA_Sukov-18 Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for discussion of potential effects to water quality and potential secondary effects related to algae blooms.

NA_Sukov-19 Project implementation is not anticipated to affect distribution of algae. Please refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for discussion of potential effects to water quality and potential secondary effects related to algae blooms.

NA_Sukov-20 Draft EIR Section 4.5, Fisheries, includes a description of the common and special status aquatic species found in the Estuary, and characterizes the type of habitat provided by the Estuary. The Estuary provides habitat for a variety of fish species including salmonids and other important recreational fish species such as American shad and smallmouth bass. In terms of conservation, much attention is given to three Endangered Species Act-listed salmonid species that are known to occur in the Russian River watershed. These are Central California Coast steelhead (*Oncorhynchus mykiss*), California Coastal Chinook salmon (*O. tshawytscha*), and Central California Coast coho salmon (*O. kisutch*; NMFS, 2010). The Estuary is important for adult and juvenile passage for the three Endangered Species Act-listed salmonids (NMFS, 2008). The Estuary provides an opportunity for smolts to acclimate to ocean conditions before migrating to the ocean, as well as potentially providing rearing habitat for steelhead and Chinook salmon. The Estuary does not provide “ripple” habitat, as noted by the

commenter. Draft EIR Section 4.5, Fisheries, quantifies that anticipated increase in potential available rearing habitat that would be created through lagoon conditions. It is expected that the Estuary Management Project will have a discernable environmental benefit and would further the goal of environmental protection through provision of 6,357 acre feet of potential rearing habitat in the Estuary from the mouth to Vacation Beach (Draft EIR page 4-21). Draft EIR Section 4.5, Impact 4.5.1, Habitat Availability, quantifies the expected increase in potential rearing habitat that would be made available through implementation of the Estuary Management Project. Impact 4.5.2, Habitat Quality, describes expected habitat conditions that would be made available through implementation of the Estuary Management Project.

NA_Sukov-21 It is anticipated that summer dam deployment would not be affected by increased in water levels. Summer dams are deployed in order to provide increased water levels for recreational uses. The lower Russian River summer dams at Johnson's Beach and Vacation Beach are upstream of the Estuary Study Area and Maximum Backwater Area (Draft EIR Figure 2-3A) and are not anticipated to be impacted by the Estuary Management Project.

NA_Sukov-22 Refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses** for a discussion related to *Ludwigia*.

NA_Sukov-23 The Draft EIR does not address introduction of fungicides, herbicides, and pesticides into the Russian River. The Estuary Management Project would not create or contribute to new or more severe sources of pollution; additionally, the Water Agency does not have the authority to control input from other dischargers.

NA_Sukov-24 The Draft EIR does not address historical introduction of mercury into the Russian River. The Estuary Management Project will not result in new sources of discharge of mercury. The purpose of this Draft EIR is to disclose the potential environmental effects of the project itself on the physical environment. Pollution in the Russian River is an external factor that cannot be controlled by the project, or enforced by the Water Agency. For a discussion of impacts related to heavy metals, including mercury and copper, refer to **Master Response 2.4, Water Quality,** in **Chapter 2, Master Responses**.

NA_Sukov-25 As noted in Draft EIR Chapter 2.0, Project Description, page 2-22, certain conditions during the Lagoon Management Period, such as water quality degradation[1] or imminent flooding to properties and structures adjacent to the Estuary, could require a change in management, and may result in the Water Agency breaching the barrier beach during the Lagoon Management Period.

[1] Water Quality parameters are defined in the North Coast Regional Water Quality Control Board's Basin Plan and would be further defined in consultation with NMFS and RWQCB.

Therefore, in the unlikely event that septic or chemical spill into the Estuary or Russian River result in nuisance conditions, the Water Agency would consult with NMFS and CDFG regarding artificial breaching during the Lagoon Management Period.

NA_Sukov-26 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, and **2. 7, CEQA Statutes: Adequacy of EIR Analysis,** in **Chapter 2, Master Responses**.

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Daniel J Sullivan
(Name: Please Print)
14280 & 14284 Laurel Rd
(Street Address)
Guerneville Ca 95446
(Town) (Zip Code)
PO Box 334 Guerneville 95446

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Sulli-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Sulli-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Sulli-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Sulli-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Sulli-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Sulli-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Sulli-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Sulli-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Sulli-9

Sincerely,

Daniel J Sullivan 1/4/11
(Signature) (Date)

Is what your doing as dumb headed as it seems. What is the hidden agenda. Is water managment made up as you go along. I've been watching and using this river for 70 yrs. NA_Sulli-10

Daniel Sullivan, January 11, 2011

NA_Sulli-1 Commenter's name and address added to distribution list.

NA_Sulli-2 Commenter is identifying individual uses of the Russian River.

NA_Sulli-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sulli-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Sulli-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Sulli-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Sulli-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses.**

NA_Sulli-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Sulli-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Sulli-10 The Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific project objectives of the proposed Estuary Management Project are established in Draft EIR Chapter 2.0, Project Description, and include providing are enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimizing flood hazards.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Ann B. Thomas
(Name: Please Print)

P O Box 726
(Street Address)

Guerneville 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_ThomaA-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression. for spiritual well being, for exercise and personal health, fishing, swimming, and Canoeing. NA_ThomaA-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_ThomaA-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_ThomaA-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_ThomaA-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_ThomaA-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_ThomaA-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ThomaA-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_ThomaA-9

Sincerely,

Ann B Thomas 1-16-11
(Signature) (Date)

Ann Thomas, January 16, 2011

NA_ThomaA-1 Commenter's name and address added to distribution list.

NA_ThomaA-2 Commenter is identifying individual uses of the Russian River.

NA_ThomaA-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_ThomaA-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_ThomaA-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_ThomaA-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_ThomaA-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_ThomaA-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_ThomaA-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_ThomaB

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 19 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Bertha L. Thomas
(Name: Please Print)

73 Ardilla Rd.
(Street Address)

Orinda Ca 94563
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_ThomaB-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_ThomaB-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_ThomaB-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_ThomaB-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_ThomaB-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_ThomaB-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_ThomaB-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ThomaB-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_ThomaB-9

Sincerely,

Bertha L Thomas 1/15/11
(Signature) (Date)

Bertha Thomas, January 15, 2011

NA_ThomaB-1 Commenter's name and address added to distribution list.

NA_ThomaB-2 Commenter is identifying individual uses of the Russian River.

NA_ThomaB-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_ThomaB-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_ThomaB-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_ThomaB-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_ThomaB-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_ThomaB-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_ThomaB-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

LEILANI THOMPSON
(Name: Please Print)
1733 CALAVARAS DR
(Street Address)
SANTA ROSA CA 95405
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Thomp-1

I utilize the Russian River in the following way(s): ~~property owner~~, ~~business owner,~~ recreationist ~~and/or tourist, for artistic expression, for spiritual well-being, for~~ exercise and personal health, fishing, ~~swimming,~~ and Kayaking. NA_Thomp-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Thomp-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Thomp-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Thomp-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Thomp-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Thomp-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Thomp-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Thomp-9

Sincerely,

Leilani Thompson 1/12/11
(Signature) (Date)

Leilani Thompson, January 12, 2011

NA_Thomp-1 Commenter's name and address added to distribution list.

NA_Thomp-2 Commenter is identifying individual uses of the Russian River.

NA_Thomp-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Thomp-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Thomp-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Thomp-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Thomp-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Thomp-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Thomp-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 14 2011

To: Jeane; Martini-Lamb

CF/45-5 1-2.1 Russian River Estuary Management Project - Correspondence

JIM TRANCHINA
(Name: Please Print)

7404 HIDDEN LAKE RD
(Street Address)

FORESTVILLE, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Tranc-1

I utilize the Russian River in the following way(s): property owner, ~~business owner,~~ recreationist and ~~/or tourist~~, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and boating. NA_Tranc-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Tranc-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Tranc-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Tranca-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Tranc-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Tranca-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Tranc-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Tranc-9

Sincerely,

(Signature) 1/11/11 (Date)

Jim Tranchina, January 11, 2011

NA_Tranc-1 Commenter's name and address added to distribution list.

NA_Tranc-2 Commenter is identifying individual uses of the Russian River.

NA_Tranc-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses.**

NA_Tranc-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Tranc-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Tranc-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Tranc-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Tranc-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Tranc-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane: Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

MR F. J. TRAPANI
(Name: Please Print)

110 CRESTMOOR CIRCLE
(Street Address)

PACIFICA, CA 94044
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Trapa-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Trapa-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Trapa-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Trapa-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Trapa-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Trapa-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Trapa-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Trapa-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Trapa-9

Sincerely,

(Signature) F. Trapani 1-11-11 (Date)

FJ Trapani, January 11, 2011

NA_Trapa-1 Commenter's name and address added to distribution list.

NA_Trapa-2 Commenter is identifying individual uses of the Russian River.

NA_Trapa-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Trapa-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Trapa-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Trapa-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Trapa-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Trapa-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Trapa-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Urbin

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB 14 2011

Sonoma County Water Agency
Attention: Jessica Martini-Lamb
404 Aviation Boulevard
Santa Rosa, CA 95403

To: Jeane, Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

February 14, 2011

Re: Estuary Project

The Sonoma County Water Agency's plan to change a tidal estuary into a freshwater lagoon is an experiment which may never work as planned. First of all, for salmon to thrive in the Russian River again we must look at the big picture. The impacts of logging, gravel mining, vineyards, pharmaceuticals from wastewater and chemical pollutants are all ignored. NA_Urbin-1

There are many CEQA Conclusions as Significant and Unavoidable. The surfers will lose the high quality waves at the river mouth. The harbor seals leave when the water level is high. River beaches will be inundated. Recreation is very important to the economy of the lower Russian River. The combination of the low flows with a closed river mouth could create a high level of pollutants. Will the river be safe to swim in? NA_Urbin-2

You must assure the houses in Jenner do not flood. At your first meetings a river height of seven feet was constant. Now you say five months of nine feet. If the river reaches ten feet, will you open the river mouth? I would like to hear the results of last years attempt to create the river outflow. And you must tell us where the water from the low flow will go. NA_Urbin-3

We know logging silts the creeks so the salmon cannot spawn. We know the vineyards use water from the creeks and river during frosty nights and there have been instances of salmon kills. There are herbicides, fungicides, pharmaceuticals that end up in the river. Low flow creates a lot of algae. There were huge salmon runs in the 1960's. We must look at everything to bring the salmon back. I do not think turning a tidal estuary into a freshwater lagoon is the answer. NA_Urbin-4

Sincerely,

Cynthia Urbina

Cynthia Urbina
P.O. Box 11
Jenner, CA 95450

Cynthia Urbina, February 14, 2011

NA_Urbin-1 Please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses** for discussion regarding the adaptive management process. With respect to Draft EIR consideration of logging, gravel mining, vineyards, pharmaceuticals from wastewater and chemical pollutants, the Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. The Estuary Management Project would not create or contribute to new or more severe sources of pollution; additionally, the Water Agency does not have the authority to control input from other dischargers.

NA_Urbin-2 Recreational resources, including surfing and river beach access are addressed in the analysis provided in Draft EIR Section 4.7, Recreation. Potential impacts to harbor seals are addressed in Draft EIR Section 4.5, Biological Resources.

For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Reducing minimum instream flows under Decision 1610 is addressed in the Draft EIR Chapter 5.0, Cumulative Analysis which concludes that recreational and water quality impacts associated with the Estuary Management Project, considered in conjunction with foreseeable effects associated with lowering flows, could result in cumulatively considerable impacts. Refer to **Master Response 2.6 Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Response** for discussion of CEQA requirements relative to analysis of socioeconomic impacts.

NA_Urbin-3 The Estuary Management Project is proposed to achieve the primary project objectives of enhancing rearing habitat for juvenile salmonids managing Estuary water levels to minimize flood hazard. As noted in Draft EIR Section 4.2, Hydrology and Flooding, water levels are not anticipated to exceed 9 feet during the Lagoon Management Period. However, as noted in Draft EIR Chapter 2.0, Project Description, page 2-22, certain conditions during the Lagoon Management Period, such as water quality degradation[2] or imminent flooding to properties and structures adjacent to the Estuary, could require a change in management; the Water Agency would consult with NMFS and CDFG regarding artificial breaching during the Lagoon Management Period.

With respect to water supply, the Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific

[2] Water Quality parameters are defined in the North Coast Regional Water Quality Control Board's Basin Plan and would be further defined in consultation with NMFS and RWQCB.

project objectives of the proposed Estuary Management Project are established in Draft EIR Chapter 1.0, Introduction, and include providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimizing flood hazard.

NA_Urbin-4 As noted in Draft EIR Chapter 2.0, Project Description, page 2-22, certain conditions during the Lagoon Management Period, such as water quality degradation[3] or imminent flooding to properties and structures adjacent to the Estuary, could require a change in management, and may result in the Water Agency breaching the barrier beach during the Lagoon Management Period.

The Estuary Management Project does not require use of fungicides, herbicides, and pesticides, nor will it result in new sources of discharge of fungicides, herbicides, and pesticides. The purpose of this Draft EIR is to disclose the potential environmental effects of the project itself on the physical environment. The use of fertilizers or chemicals in the Russian River Watershed is an existing condition that would not be affected by the project. Therefore, an exhaustive list of all fertilizers or chemicals used within the watershed is not included in the Draft EIR. For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**.

[3] Water Quality parameters are defined in the North Coast Regional Water Quality Control Board's Basin Plan and would be further defined in consultation with NMFS and RWQCB.

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ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 20 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

GLADYS M. VAIL
(Name: Please Print)

3486 E REDLANDS AVE.
(Street Address)

FRESNO, CA. 93726
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the "*Russian River Estuary Management Project: Draft Environmental Impact Report*" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Vail-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Vail-2

I am concerned about the bifurcation (separation) of the Estuary Project from the "*Fish Habitat Flows and Water Rights Project*". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Vail-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Vail-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Vail-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Vail-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Vail-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Vail-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Vail-9

Sincerely,

Gladys M. Vail 1/14/11
(Signature) (Date)

My summer home is in
Villa Grande, Sonoma Co. 95486

Gladys Vail, January 14, 2011

NA_Vail-1 Commenter's name and address added to distribution list.

NA_Vail-2 Commenter is identifying individual uses of the Russian River.

NA_Vail-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Vail-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Vail-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Vail-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Vail-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Vail-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Vail-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 2 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

CHARLES WAGNER
(Name: Please Print)

15837 WRIGHT DR
(Street Address)

GUERNEVILLE, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. ~~Please put my name and address on your notification list for all meetings and documents related to this project.~~ NA_WagneC-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and KAYAKING. NA_WagneC-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_WagneC-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_WagneC-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_WagneC-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_WagneC-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_WagneC-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_WagneC-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_WagneC-9

Sincerely,

Charles E. Wagner 1-31-2011
(Signature) (Date)

Charles Wagner, January 31, 2011

NA_WagneC-1 Commenter's name and address added to distribution list.

NA_WagneC-2 Commenter is identifying individual uses of the Russian River.

NA_WagneC-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_WagneC-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_WagneC-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_WagneC-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_WagneC-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_WagneC-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_WagneC-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_WagneR

RICHARD WAGNER
(Name: Please Print)
6031 ANDERSON RD
(Street Address)
FORESTVILLE, CA 95436
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_WagneR-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and KAYAKING / RELAXATION. NA_WagneR-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_WagneR-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_WagneR-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_WagneR-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_WagneR-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_WagneR-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_WagneR-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_WagneR-9

Sincerely, Richard Wagner 1-26-11
(Signature) (Date)

Richard Wagner, January 26, 2011

NA_WagneR-1 Commenter's name and address added to distribution list.

NA_WagneR-2 Commenter is identifying individual uses of the Russian River.

NA_WagneR-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_WagneR-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_WagneR-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_WagneR-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_WagneR-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_WagneR-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_WagneR-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

(Name: Please Print)

Mr. and Mrs. Warren Watkins
418 Matheson St.
Healdsburg, CA 95448

(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Watki-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and Kayaking. NA_Watki-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Watki-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Watki-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Watki-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Watki-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Watki-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Watki-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Watki-9

Sincerely,

Janis Watkins 1/30/11

(Signature) (Date)

Mr. & Mrs. Warren Watkins, January 30, 2011

NA_Watki-1 Commenter's name and address added to distribution list.

NA_Watki-2 Commenter is identifying individual uses of the Russian River.

NA_Watki-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Watki-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Watki-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Watki-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Watki-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Watki-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Watki-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

EDWARD J WATSON
(Name: Please Print)

1444 BALBOA AVE
(Street Address)

BURLINGAME 94010
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Watso-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and KAYAKING. NA_Watso-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Watso-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Watso-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Watso-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Watso-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Watso-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Watso-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Watso-9

Sincerely,

(Signature) 1/11/11 (Date)

Owner of a Russian River Summer Residence.

EJW

Edward Watson, January 11, 2011

NA_Watso-1 Commenter's name and address added to distribution list.

NA_Watso-2 Commenter is identifying individual uses of the Russian River.

NA_Watso-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Watso-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Watso-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Watso-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Watso-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Watso-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Watso-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

LENNY WEINSTEIN
(Name: Please Print)
P.O. Box 526 (21311 Hwy 116)
(Street Address)
MONTE RIO 95462
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Weins-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and SANITY. NA_Weins-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Weins-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Weins-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Weins-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Weins-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Weins-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Weins-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Weins-9

Sincerely,

(Signature) JAN 14, 2011
(Date)

Lenny Weinstein, January 14, 2011

NA_Weins-1 Commenter's name and address added to distribution list.

NA_Weins-2 Commenter is identifying individual uses of the Russian River.

NA_Weins-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Weins-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Weins-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Weins-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Weins-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Weins-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Weins-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

MAR 1 1 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Margaret Whitaker-Greene
(Name: Please Print)
19390 Pine Glade
(Street Address)
Guerneville, CA 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Whita-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Whita-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Whita-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Whita-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Whita-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Whita-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Whita-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Whita-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Whita-9

Sincerely,

Margaret Whitaker-Greene 1/13/2011
(Signature) (Date)

Margaret Whitaker-Greene, March 11, 2011

NA_Whita-1 Commenter's name and address added to distribution list.

NA_Whita-2 Commenter is identifying individual uses of the Russian River.

NA_Whita-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Whita-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Whita-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Whita-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Whita-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Whita-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Whita-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Katie Blank

From: victoria wikle [victoriawikle@usa.net]
Sent: Sunday, January 09, 2011 3:04 PM
To: estuaryproject
Subject: Russian River Estuary Management Project

Categories: Orange Category

Sonoma County Water Agency
Attn: Jessica Martini Lamb

I include my comments on the project.

With the estuary closed, the reach of the river upstream from Austin Creek to Vacation Beach is impacted by higher water levels, lack of flow and degraded water quality. The project needs to address improving the poor water quality that has resulted from prior closings of the estuary and for the project as planned. NA_Wilke-1

River flow directly impacts the conditions at the estuary. A closed estuary implies lower flow in the lower river. The estuary management project must be studied in conjunction with flow rates. NA_Wilke-2

Sincerely,
Victoria Wikle
PO Box 151
Villa Grande, CA 95486

Victoria Wikle, January 9, 2011

NA_Wikle-1 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2 Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses** regarding impacts from Austin Creek to Vacation Beach during the Lagoon Management Period. The response assumes that the comment regarding "lack of flow" relates to residence time of water in the Estuary and not reduced flows. The comment asserts the Draft EIR should address water quality issues that occurred during prior closings. Prior natural closure conditions are not a subject of the Draft EIR and are not retroactively analyzed. Refer to Draft EIR Section 4.3, Water Quality, page 4.3-22 for information regarding the residence time of flow in the lagoon system.

Water quality issues, including short-term impacts during outlet channel creation (Impact 4.3.1), impacts to salinity, dissolved oxygen, and temperature during the Lagoon Management Period (Impact 4.3.2), and effect of nutrient and bacteria levels during the Lagoon Management Period (Impact 4.3.3), are disclosed in Draft EIR Section 4.3, Water Quality. For additional discussion regarding potential impacts to water quality, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Wikle-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

Comment Letter NA_Winte

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

WILLIAM WINTERS
(Name: Please Print)
17848 ORCHARD AVE
(Street Address)
GUERNEVILLE 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Winte-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Winte-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Winte-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Winte-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Winte-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Winte-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Winte-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Winte-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Winte-9

Sincerely, William J Winters

(Signature) (Date)

William Winters, January 18, 2011

NA_Winte-1 Commenter's name and address added to distribution list.

NA_Winte-2 Commenter is identifying individual uses of the Russian River.

NA_Winte-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Winte-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Winte-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Winte-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Winte-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Winte-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Winte-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

Comment Letter NA_Wood

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 18 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

A. J. WOOD
(Name: Please Print)

8840 BODEGA HWY.
(Street Address)

SEBASTOPOL 95472
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address ~~on your notification list for all meetings and documents related to this project~~. NA_Wood-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and ECOLOGY PRESERVATION. NA_Wood-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Wood-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Wood-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Wood-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Wood-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Wood-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Wood-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Wood-9

Sincerely,

(Signature) 1/17/11 (Date)

AJ Wood, January 17, 2011

NA_Wood-1 Commenter's name and address added to distribution list.

NA_Wood-2 Commenter is identifying individual uses of the Russian River.

NA_Wood-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Wood-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Wood-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Wood-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Wood-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Wood-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Wood-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Anne Wurr

Anne E. Wurr
603 Keller St.
Petaluma, CA 94952-2807

12th January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please ~~put my name and address on your notification list for all meetings and documents related to this project.~~ NA_Wurr-1

I utilize the Russian River in the following way(s): ~~property owner~~, ~~business owner~~, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, ~~fishing,~~ swimming, ~~and~~ _____. NA_Wurr-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Wurr-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Wurr-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Wurr-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Wurr-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Wurr-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Wurr-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Wurr-9

Sincerely,

Anne E. Wurr 1/12/2010

(Signature) (Date)

Anne E. Wurr
603 Keller St.
Petaluma, CA 94952-2807

Anne Wurr, January 14, 2011

NA_Wurr-1 Commenter's name and address added to distribution list.

NA_Wurr-2 Commenter is identifying individual uses of the Russian River.

NA_Wurr-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Wurr-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Wurr-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Wurr-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Wurr-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Wurr-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Wurr-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

COPY
ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY
FEB - 7 2011

Dana Zimmerman
1900 Neeley Rd.
Guerneville, CA 95446
February 4, 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd
Santa Rosa, Ca 95403

Dear Ms. Martini-Lamb

I wish to express my concern about the "Russian River Estuary Management Project: Draft Environmental Impact Report" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_ZimmeD-1

I am concerned about the separation of the Estuary Project from the "Fish Habitat flows and Water Rights Project". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. CEQA requires that the entire project be considered in one environmental document. "Low Flow" is inexorably linked to the Estuary Project through the BO. It is wrong to segregate the process. NA_ZimmeD-2

My preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ZimmeD-3

My area provides several river side parks and installs two summer recreation dams in the lower river for residents and visitors to enjoy swimming, fishing, kayaking, canoeing, and other forms of recreation. The Russian River Recreation District was established in 1941 to install summer dams for summer enjoyment of the Russian River by locals and tourists. NA_ZimmeD-4

I am concerned about the impact to water quality from decreased water flow; including possible added pollution from nutrients, regulated and emerging toxins, bacteria, temperature, and invasive species. Reducing the flow will seriously impede the enjoyment of the river by residents and visitors to our riverside parks. NA_ZimmeD-5

I am also concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_ZimmeD-6

Another concern results from the fact that in 2009 several locations along the lower river tested positive for enterococcus. During the last 10 years of bacteriological testing of the river there was only one positive test at Johnson's Beach in Guerneville. The test was in July 2002, the water tested positive for ecoli, but there was a documented sewage spill from Santa Rosa at the time. NA_ZimmeD-7

COPY

Again, my preferred project maintains estuary level at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ZimmeD-8

Sincerely,

Dana Zimmerman
russianriverrat@hotmail.com
(707)869-9184

Cc: 5th District Supervisor, Efren Carrillo

Dana Zimmerman, February 4, 2011

NA_ZimmeD-1 Commenter's name and address added to distribution list.

NA_ZimmeD-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2. 1, Relationship to Other Biological Opinion Elements**, and **2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**.

NA_ZimmeD-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, and a discussion relevant to the comment's assertion that the change in minimum flows is intended to prevent flooding, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Commenter is expressing preference for Reduced Project Alternative. Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_ZimmeD-4 Comment is not directed to Draft EIR analysis; no response or text changes are necessary.

NA_ZimmeD-5 Please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** for a discussion related flows and **Master Response 2.4, Water Quality** in **Chapter 2, Master Responses.** Reducing minimum instream flows under Decision 1610 is addressed in the Draft EIR Chapter 5.0, Cumulative Analysis which concludes that recreational and water quality impacts associated with the Estuary Management Project, considered in conjunction with foreseeable effects associated with lowering flows, could result in cumulatively considerable impacts. The Draft EIR reviews and discloses potential impacts to water quality associated with implementation of the Estuary Management Project (Section 4.3, Water Quality).

NA_ZimmeD-6 For a discussion of water quality, and analysis of best available data, please refer **to Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_ZimmeD-7 As stated in Impact 4.3.3, Estuary Management Project implementation would not alter water quality inputs for bacteria or nutrients into the Estuary. Additionally the Water Agency does not have the authority to control inputs from other discharges. Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_ZimmeD-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

FEB - 7 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Marilyn Zimmerman
16900 Neeley Rd.
Guerneville, CA 95446
February 4, 2011

Sonoma County Water Agency
Attn: Jessica Martini-Lamb
404 Aviation Blvd
Santa Rosa, Ca 95403

Dear Ms. Martini-Lamb,

I wish to express my concern about the "Russian River Estuary Management Project: Draft Environmental Impact Report" released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_ZimmeM-1

I am concerned about the separation of the Estuary Project from the "Fish Habitat flows and Water Rights Project". The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. CEQA requires that the entire project be considered in one environmental document. "Low Flow" is inexorably linked to the Estuary Project through the BO. It is wrong to segregate the process. NA_ZimmeM-2

My preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ZimmeM-3

The Guerneville area provides several river side parks and installs two summer recreation dams in the lower river for residents and visitors to enjoy swimming, fishing, kayaking, canoeing, and other forms of recreation. The Russian River Recreation District was established in 1941 to install summer dams for summer enjoyment of the Russian River by locals and tourists. NA_ZimmeM-4

I am concerned about the impact to water quality from decreased water flow; including possible added pollution from nutrients, regulated and emerging toxins, bacteria, temperature, and invasive species. Reducing the flow will seriously impede the enjoyment of the river by residents and visitors to our riverside parks. NA_ZimmeM-5

I am also concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_ZimmeM-6

Another concern results from the fact that in 2009 several locations along the lower river tested positive for enterococcus. During the last 10 years of bacteriological testing of the river there was only one positive test at Johnson's Beach in Guerneville. The test was in July 2002, the water tested positive for ecoli, but there was a documented sewage spill from Santa Rosa at the time. NA_ZimmeM-7

Again, my preferred project maintains estuary level at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_ZimmeM-8

Sincerely,

Marilyn Zimmerman
russianriverrat@gmail.com
(707)529-5669

Marilyn Zimmerman, February 4, 2011

NA_ZimmeM-1 Refer to response to comment NA_ZimmeD-1.

NA_ZimmeM-2 Refer to response to comment NA_ZimmeD-2.

NA_ZimmeM-3 Refer to response to comment NA_ZimmeD-3.

NA_ZimmeM-4 Refer to response to comment NA_ZimmeD-4.

NA_ZimmeM-5 Refer to response to comment NA_ZimmeD-5.

NA_ZimmeM-6 Refer to response to comment NA_ZimmeD-6.

NA_ZimmeM-7 Refer to response to comment NA_ZimmeD-7.

NA_ZimmeM-8 Refer to response to comment NA_ZimmeD-8.

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Comment Letter NA_Zucke

ORIGINAL DOCUMENT
SONOMA COUNTY WATER AGENCY

JAN 13 2011

To: Jeane; Martini-Lamb

CF/45-5.1-2.1 Russian River Estuary Management Project - Correspondence

Shula Zuckerman
(Name: Please Print)
14631 Old Cazadero Rd
(Street Address)
Guerneville 95446
(Town) (Zip Code)

January, 2011

SONOMA COUNTY WATER AGENCY
ATTN: JESSICA MARTINI-LAMB
404 AVIATION BLVD.
SANTA ROSA, CA 95403

Dear Ms. Martini-Lamb:

I wish to express my concerns about the *"Russian River Estuary Management Project: Draft Environmental Impact Report"* released on December 15, 2010. Please put my name and address on your notification list for all meetings and documents related to this project. NA_Zucke-1

I utilize the Russian River in the following way(s): property owner, business owner, recreationist and/or tourist, for artistic expression, for spiritual well being, for exercise and personal health, fishing, swimming, and _____. NA_Zucke-2

I am concerned about the bifurcation (separation) of the Estuary Project from the *"Fish Habitat Flows and Water Rights Project"*. The stated purposes of both projects is to fulfill requirements of the Biological Opinion (BO), which assumes that river flows must be managed to allow formation of an estuary lagoon to provide habitat for threatened fish. NA_Zucke-3

Please address the issues below:

- CEQA requires that the entire project be considered in one environmental document. "Low flow" is inexorably linked to the Estuary Project through the BO. It is wrong to bifurcate the process. NA_Zucke-4
- Estuary Project only analyzes impacts to Duncans Mills, whereas impacts from closed mouth & flow alteration, affects river as far upstream as Vacation Beach. NA_Zucke-5
- SCWA can't control flows at Hacienda during wet years as evidenced in 2010 when dam releases were reduced and flows averaged 260 cfs from June through September. This project is only viable during drought years when water quality impacts would be greatest. This should be analyzed in light of BO requirements. NA_Zucke-6
- When flows are lowered in dry years, the river mouth usually stays open anyway as evidenced in August, 2009 when flows averaged 63 cfs all month. NA_Zucke-7
- The preferred project maintains estuary levels at 8'. No buildings would be flooded at this level, making low flow unnecessary for this purpose. NA_Zucke-8
- I am concerned that water quality monitoring studies in 2009 were inadequate, and that data for 2010 has not been made available to the Water Quality Control Board or the public. The outcome of water quality studies will not be available until the EIR on "low flow project" is released in 1.5 years. This is unacceptable. NA_Zucke-9

Sincerely,

(Signature) (Date)

Shula Zuckerman, January 13, 2011

NA_Zucke-1 Commenter's name and address added to distribution list.

NA_Zucke-2 Commenter is identifying individual uses of the Russian River.

NA_Zucke-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Zucke-4 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Responses 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

NA_Zucke-5 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas, and Scope of Analysis**, in **Chapter 2, Master Responses**.

NA_Zucke-6 For a discussion of the relationship of the Estuary Management Project to river flows, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

NA_Zucke-7 For discussion of the relationship between barrier beach closures and flow, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements, in Chapter 2, Master Responses**.

NA_Zucke-8 Refer to **Master Response 2.5, Alternatives Analysis,** in **Chapter 2, Master Responses**, for a discussion of alternatives, including the Reduced Project Alternative, considered in the Draft EIR.

NA_Zucke-9 For a discussion of potential impacts to water quality, please refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

3.4 Responses to Public Hearing Comments

This section includes copies of the verbal comments recorded in the transcripts from the Public Hearing, January 18, 2011. The responses to verbal comments are inserted within the transcript after each full page of corresponding comments and are presented in order of commenter appearance.

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MR. O'TOOLE: Available at the libraries and I believe also available at the Water Agency upon request.

CHAIRMAN CARRILLO: Are they available online?

MR. O'TOOLE: They are also available on the agency's web page.

CHAIRMAN CARRILLO: Thank you, Jim, and thank you, Jessica, for both your presentations.

At this point I will open up the public hearing. If you would like to please form two lines, on one side or the other side, and I will take speakers from both sides of the room. If you do have cards to submit, submit them to the clerk or submit them to Ann.

I'm sorry, I didn't introduce my colleagues here on the panel. I have, as I mentioned, both director supervisors Mike McGuire and David Rabbitt, as well as County Counsel, and the general manager of Sonoma County Water Agency.

I will begun with Suki Waters.

MS. WATERS: Is it possible to pull up the seven- to nine-foot difference where it showed the entire estuary? That would help. Thank you.

CHAIRMAN CARRILLO: First Suki Waters, and up next Darrell Sukovitzen.

H_Water

MS. WATERS: Hi. Can you hear me?

CHAIRMAN CARRILLO: Yes.

MS. WATERS: So glad to see you are all here.

My name is Suki Waters. My family is Kashia Pomo descendants. My grandmother was born on the beach here in the native village. And I also own WaterTreks EcoTours. I'm an environmental educator. I have been providing outdoor interpretation and recreational education since 1987.

And I'm also the creator of the Living Classrooms Project. Each year we have middle school students that come and we match their curriculum for their science and history classes. And the estuary is basically our living classroom for a major portion of what we do.

A couple of things to highlight. Just a couple things that I noticed mentioned in the presentation, and I would like to use this map here.

Where the river mouth currently goes out, it's really interesting. Historically and from memory as a child, before they started pulling out, they did a huge gravel mining project, a dredging project. So if we look in this area here (indicating), okay, we come around this corner, here's the River End and the community is here. And then this area here going over toward the mouth, the jetty, the cement jetty should be right in here (indicating). This whole area here when I

H_Water-1

was a child was all sandy beach. We used to play on that beach. The family could look over the hill. We weren't allowed to go back around the corner where you couldn't see.

So where the river mouth currently goes out, I know that there's some difficulty in managing when it's open and when it's closed, but that's not a historic location for the river mouth opening.

HA_Water-1 cont.

Also, with our classes, and in general, this whole area in here (indicating), there's actually mostly a solid barrier underneath that. Much of it is broken through, but what most people don't realize is you can get out there and walk it, right in this area here. From the parking lot there's a solid structure that goes out here and then it drops off, it's cuts through where the natural water has broken through this area.

And then there's this huge sand pile that's left over from that project, from pulling this gravel out, and from dredging out this part of the island. And right now that resides, part of that resides in a big sand pile here (indicating).

So unfortunately this section here is actually higher than it would normally be because of that structure underneath.

I love the comment about the natural

HA_Water-2

1 percolation through here. It's absolutely beautiful.
2 When the river mouth does start to close you can see the
3 high tide, you can see that water percolating through,
4 it actually bubbles in through here (indicating). And
5 when the tide goes down the water starts to flow out,
6 and you can see the same thing happening on the other
7 side over here (indicating).
8 Historically that percolation occurred through
9 this entire reach. And I suspect that why there's so
10 much breaking through in this area has something to do
11 with our oral native history that the river mouth
12 actually, when it did break through, breaking through
13 more in this area (indicating).
14 There's a photo actually in the visitor's
15 center, at our state park visitor's center, that shows
16 back in 1904 the river mouth, its flooding period, but
17 it comes out, this is where it comes out at, right in
18 through here (indicating). Yeah.
19 So I think as far as what they have been
20 managing to do, it's working about the best ability they
21 are going to get it, considering that it's not a natural
22 location. And I heard some mention of possibly thinking
23 about removing that in the future. And I also heard
24 some concerns about tsunamis and sea-level rises. I
25 don't know what to say about that.

H_Water-2 cont.

H_Water-3

H_Water-4

I just know that from my history and from what I've observed, there's so many things to consider that are not originally part of the natural conditions in this area.

However, I do believe that the river mouth did close more often and there was more estuary conditions, but I don't believe that if we allow it to close we are going to get the same natural percolation that we would had that barrier, if -- unless that barrier were removed. H_Water-5

Other than that, I do have -- thank you.

Anyway, I really -- all the life in the estuary is very important, and I would please urge you to please consider not removing the estuary from any of the -- from being separate from the Biological Opinion. Everything comes downstream and it's physically connected to the river. You can't just remove it on paper. If you want to consider all the impacts, you need to keep it with it because it's physically connected. H_Water-6

Thank you.

CHAIRMAN CARRILLO: Thank you, Ms. Waters.

Mr. Darrell Sukovitzen, and Ms. Brenda Adelman after. H_Sukov

MR. SUKOVITZEN: My name is Darrell Sukovitzen.

And I could spell it for you but I think everybody knows it by heart.

CHAIRMAN CARRILLO: I do.

MR. SUKOVITZEN: My comments will be brief and I will be submitting a letter to the administrative record on the Draft EIR.

Just a couple of things. I noticed that at the public facilitating committee meeting a few weeks back, on that panel, and that had to do with the low-flow issue, on that panel were three members of the board. And so I just wondered if that constituted a Board of Supervisor's public hearing, and subsequently will those comments be incorporated that were made at that public facilitating committee. Will those comments and any supportive documentation be included in the record of this EIR public comment period? H_Sukov-1

I sometimes make my statements in the form of questions, and I love to ask questions.

I was able to attend two of the three public scoping sessions on this topic. The one in Jenner, of course, was a bit of a row, and the one in Windsor was instructive. Jenner was a packed house. And at Windsor there were four members of the public there and nine agency staff, so, and there were two members here tonight that were at that meeting, two members of the H_Sukov-2

public that is.

The other person there was David Keller, Friends of the Eel River, and David and I had a great opportunity to speak with staff and methodically ask questions and methodically bring the question back around when we didn't get the answer, period. It would be circumvented by dialogue, by staff, and they are very good at that.

H_Sukov-2 cont.

One of the questions that we kept asking in different fashions, and comfortably we got a reaction, a response in staff, and that question was, well, on the low-flow issue, which is part this equation on creating a habitat in the estuary for steelhead salmonids, the water, if the low-flow regime is enacted on a permanent basis, or temporary year to year as it is now, the water that will not be going down the river, what will be done with that water? There's water that won't be going down the river, where is it going to go?

H_Sukov-3

Staff final came up with an answer, and they made it very clear that it was not official government policy at the Board of Sups or the Water Agency board, but they said, well, in house they have had conversations amongst staff about the potential for doing aquifer injections in the Santa Rosa valley. And that was very interesting to me, that they finally

opened up to a very light crowd, and David Keller and I were both cordial and respectful to them, unlike how I was at the first scoping session.

By the way, Efren and I, after the first scoping session, diced back and forth in the Sonoma West Times & News in the guest editorial, and it was entertaining.

The question that I kept asking was, what's going to happen to that water? I believe that the answer might be, in that the Sonoma County Water Agency has oversold their contractual allotments to the cities, and in turn, based on that belief that they will have water, have issued building permits that now they are stuck with. So the Water Agency, I know they are going to come up with the water somewhere. That's a question that really needs to be answered as part of this EIR.

H_Sukov-3 cont.

The other thing that I found instructive was on the question of pollutants. And Bill Hearn, at the public facilitating committee from National Marine Fisheries Service, his answer was interesting, also.

And my question to him was at that time, what happens when, and have you considered the effect of the fungicides, herbicides, and pesticides with drift air, air presentation to the water, or drift runoff from rain flow? Many of these chemicals used in the vineyard

H_Sukov-4

industry clearly state, on the risk assessment labels and material data sheets, that do not use in any place where they can enter into a stream, because they will suffocate fish. And so has that aspect been adequately addressed in this Draft EIR? I haven't read it yet, but I will find out. I suspect that it hasn't even been touched on.

H_Sukov-4 cont.

Thank you.

CHAIRMAN CARRILLO: Thank you, Mr. Sukovitzen. I appreciate your time.

Ms. Brenda Adelman. And up next, Dian Hardy.

MS. ADELMAN: Brenda Adelman.

H_Adelm

I want to thank you very much for having a meeting out in our community. I am sure all the people here in this room greatly appreciate that you are doing this, and I just want to thank you for that.

I had two major concerns. I've been going through the EIR, it's quite a lengthy document, and I'm about halfway through. I will be submitting lengthy written comments, so I won't turn anything in tonight.

But the two big issues I have great concerns about is the relationship of this EIR with the Decision 1610 EIR. And to be real honest, I think this EIR makes a really good case for not needing low flow in order to make this project work. And I'm going to mention some

H_Adelm-1

of the points here. And I think I'll just read them so I can get most of them in in my five minutes.

The DEIR justifies not combining the EIR of the two projects by alluding to their separation and sequential nature of the projects in the BO, the Biological Opinion. So, in other words, because the Biological Opinion says you should do it this way, thus you are doing what they are telling you to do, which is not necessarily the appropriate way to go.

H_Adelm-1 cont.

Dick Butler, in fact, of the National Marine Fisheries Service, in the scoping session of this EIR, had a June 22nd letter where he said, We believe that it is reasonable that the EIR for the estuary project consider the effects of flow changes, associated with interim flow changes, associated with the TUC petition, and use existing information to address the effects of these interim changes on the environment and resources, such as recreational boating.

And it appears that yet this EIR continues to state that the two will be separated and dealt with separately.

H_Adelm-2

This DEIR of the estuary states that the back flow from the closed mouth reaches as far upstream as Vacation Beach, and that was mentioned tonight, too. It comes up in many places in the EIR. And yet the studies

H_Adelm-3

and impacts are only studied mostly up to Duncans Mills, occasionally a few things up to Monte Rio.

And in my mind that is simply inadequate, because this project, as it's being presented here, impacts the lower Russian River much further upstream than Duncans Mills.

H_Adelm-3 cont.

And I just want to add, I think you are all familiar, but our group did a photo report on water quality impairments that is in this document as part of the scoping materials, and we have all kinds of pictures in there showing the problems with water quality during 2009 when low flow created all kinds of nuisance algae and Ludwigia problems.

H_Adelm-4

There's been no environmental justification given in the Biological Opinion for meeting low-flow levels at Hacienda, other than to prevent flooding in the estuary area.

But as mentioned here, only nine properties flood at nine feet, and seven of those are boat ramps or docks. I wonder why they don't have floating ramp docks like they have in Monte Rio. And one property I've been told is a garage attached to a house, and that is one property which is the Visitors Center, which is sitting on piers in the water and floods at nine feet. Also has a sewer pipe coming fully exposed and goes through the

H_Adelm-5

water into the ground.

I ask the question, is this adequate justification for all the damage that will be done upstream as a result of lowering the flows from 125 cfs at Hacienda to 70? H_Adelm-5 cont.

The environmental cost of low flow must be balanced with this estuary situation. During low flow water quality in the lower river deteriorates extensively with high bacteriological readings, excessive nutrients, including massive algae blooms and extensive Ludwigia mats. And there's also concern about possible problems with blue-green algae, which is highly toxic. H_Adelm-6

The baseline data is inadequate. It was mentioned to you that many places they don't have adequate baseline data, and therefore they consider it they are not able to mitigate. H_Adelm-7

Can I have just a little more time, please?

MEMBER OF AUDIENCE: I'll give Brenda my five minutes.

MS. ADELMAN: Thank you very much. I'll try and go quickly.

Anyway, the EIR concludes that since the river is not listed under the Clean Water Act as impaired for nutrients, so current levels can serve as a baseline for H_Adelm-8

the project as serving beneficial uses, identified as such aquatic habitat and recreation.

The nutrient levels can be too high for the fish even though the nutrients aren't listed yet. That's one of the things we are working on. There's a 2012 listing for -- 303(d) list where that's being recommended to be put on the list.

And I know in the EIR I read where nutrients and bacteria are a serious concern for the estuary as well, and so it's not something that should be ignored or sloughed off.

There's really not much data, certainly no raw data that I noticed in the EIR, having to do with water quality. We wonder what happened to the monitoring program set up with the regional board under the Temporary Urgency Change Order. The nutrient data for 2009 that was collected by the Water Agency was considered totally inadequate by the Water Quality Control Board staff.

H_Adelm-8 cont.

I mentioned massive algae bloom.

H_Adelm-9

And also I don't think there was anything mentioned in the presentation about high temperature levels and that the river is listed under 303(d) for temperature impairment. I've been watching just at the Guerneville, I've been getting all the data on that for

H_Adelm-10

the last several years, and I've been watching just at Guerneville. It averages, I would say, in the summertime, 23 to 24 celsius, degrees celsius, which is pretty -- well, it's very difficult. It won't kill a salmonid immediately but it will certainly stress their metabolism.

And I'm just wondering, the big question in my mind is, how is that going to impact the estuary if the estuary is closed for five months, and there's only about six to ten feet of surface water that's freshwater? You know, the temperature issue I didn't feel, from what I saw, was adequately addressed.

H_Adelm-10 cont.

CHAIRMAN CARRILLO: Ms. Adelman, I'm going to ask you to conclude your remarks, please.

MS. ADELMAN: Okay. I was just wondering, the anoxic zone, I didn't see anything in there, whether it was tested for toxins. And I'm just wondering about any interchanges that might occur or what changes might occur in the upper freshwater layer as a result of things going on in the anoxic zone.

H_Adelm-11

And I'll just leave it there. There are just so many things in this document. I found a lot of inconsistencies. And I found an awful lot of repetition. I think it could have been cut easily by 200 pages. It makes it very hard to read.

H_Adelm-12

And just one last thing. I'm just really concerned about the use of the word natural. It really isn't defined, and it needs to be, because there's reference made to so-called natural flows in the Russian River that actually occurred 100 years ago before all of the many different impacts to the river occurred that have been man-made impacts to land use, and other cause of uses, that have created all kinds of problems for the river that just needs to be addressed. It all needs to be looked at in an integrated way and not in this piecemeal fashion. H_Adclm-13

Thank you.

CHAIRMAN CARRILLO: Thank you, Ms. Adelman.

I've got only one more blue card here on my table. I don't know, if you have cards, if you could please submit them to the clerk or to Ann over here on the right.

Next speaker is Dian Hardy. After Ms. Hardy, I have Norma Jellison. H_Hardy

MS. HARDY: As the founder of the Seal Watch Program I feel a continuing responsibility to work for the best interest of my constituency, the harbor seal haulout at the mouth of the river. So I wrote a letter under a kind of an emotional duress as this was, this enormous project was gathering force and moving forward. H_Hardy-1

And I haven't looked at it for a couple of years, so excuse me, I'm going to be reading from it.

I started it out by saying, When we try to pick anything out by itself we find it hitched to everything else in the universe. John Muir said that. So, okay.

Here we go again, Folks, what I'm learning to call the Humpty Dumpty School of Resource Management is in full spades. In order to save three endangered salmonid runs agencies, federal, state and county, appear willing to overlook the totality of the ecology found at the mouth of the Russian, that is, the harbor seal haulout, our resting and foraging site for migratory birds, and the fishery that includes Dungeness crabs, amongst other species.

I don't understand this almost willful failure of agencies to carry forward an ecological perspective as called for, one would assume, in the enabling language for the Endangered Species Act. If such a vision is not part of the ESA, I submit that we need a department of the ecology capable of seeing the forest, and the trees, and the ocean, and the rivers, and seals, and the salmon, and unless any of my two-legged comrades despair of me completely, the people who reside and recreate at the coast, river, and ocean.

A holistic perspective would consider the human

H_Hardy-1 cont.

H_Hardy-2

H_Hardy-3

impact on our planet's natural systems of primary concern.

In the present case, Warm Springs Dam had a huge impact on the native fishery, essentially destroying it, and replacing it with a mechanistic model. The dam allowed enormous population growth in Sonoma County and the resulting inputs from agriculture, forestry, gravel mining, and residential and commercial development further decimated the salmon. Native American gathering lands and a way of life that was sustainable fell to the dam's construction.

H_Hardy-3 cont.

I say it's time we start demanding that agencies responsible for policy decisions make them based on a holistic understanding of what an ecosystem is.

I remember one winter when a series of storms washed out the road to Goat Rock and hundreds and hundreds of birds and seals gathered there for weeks, unmolested by even our curiosity, benevolent though it may be.

In closing, let your county supervisors, Sonoma Water Agency, Fish and Game, and your federal representatives know your concerns that a new perspective is needed.

Thank you.

CHAIRMAN CARRILLO: Thank you, Ms. Harding.

Next speaker, Norma Jellison. And after her, Barbara DeIonno.

I appreciate you staying within your time frame.

MS. JELLISON: I'm not going to say too much. It's pretty hard to follow Brenda and Dian.

I'm Norma Jellison. I live in Bodega Bay. And I'm a long time seal watch docent down on the beach at Goat Rock. H_Jelli

And I really don't just want to speak for or about the seals, as I have spoken in many other -- on many other occasions. I really look at the entire ecosystem, the birds that use this area, the other species, invertebrates up through fish, the crab that are in the estuary, and the people that come to the beach that I see all the time when I'm down there interpreting about the harbor seals, who bring their children to wade on the river side, that beach at Goat Rock, not just on the ocean side. H_Jelli-1

But I have to say, one thing I would like to focus on is the less than significant impact on the pinnipeds that is in the DEIR, which I disagree with, because really what's only -- you are only looking at the impact from the use of the equipment on the colony. H_Jelli-2

H_Jelli-2 cont.

1 And really that's a direct and immediate and primary
2 impact associated with the operations on the beach and
3 the disruption of the colony. And, yes, if you follow
4 the protocol of the Incidental Harassment Authorization
5 permit, those impacts can be minimized.
6 However, the secondary impact of the long-term
7 time frame that the mouth is closed and the barrier
8 beach is in place on the colony is significant and it is
9 unavoidable. The barrier beach results in more
10 disturbance to the colony associated with people walking
11 down the beach when the seal watch docents are not
12 present.
13 And I do predict that in the end we will lose
14 the harbor seal colony totally because of this project.
15 After 34 years of having a presence on this beach of
16 that harbor seal colony, being the ambassador to many
17 people and the interface between the river and the
18 ocean, I do believe that this project will result in
19 loss of that colony, which I do feel is irrevocable and
20 major and significant and unavoidable.
21 Thank you.
22 CHAIRMAN CARRILLO: Thank you, Ms. Jellison.
23 Barbara DeIonno. And after that, Vesta
24 Copestakes. Any other blue cards please submit them to
25 the clerk or to Ann.

H_DeIon

MS. DeIONNO: Barbara DeIonno, and I live in Forestville and use the river for swimming.

And I'm concerned about the push to change Decision 1610. I've been reading the Draft EIR today for the estuary project. And as Jim O'Toole said, it seems this estuary project has to be able to handle whatever flow comes down the river. And so I don't see the justification for lowering the river flow.

My position is that I hope that the Water Agency will drop the push to change Decision 1610 and to lower the river flow. It's not clear that this will make the estuary project happen, but it is clear that it damages recreation, it damages water quality in my part of the river.

H_Delon-1

The Biological Opinion analyzes what might happen with lowering flows in the upper river and Dry Creek, but it doesn't analyze what would happen to the lower river where I live. It seems that it damages water quality. It warms up the water.

H_Delon-2

There's less habitat for people and for fish with the low flow. It's a pretty drastic reduction. It's a 44-percent reduction in the flow of the river. We have experienced this in recent years, and it's not that -- the Water Agency hired Entrix in 2004 to kind of tell the public that low flow really wasn't that bad and

H_Delon-3

it was a really great idea, and this time the PR campaign seems a little better, but it's still not convincing that this is a good thing to do. So I don't understand the push to change the river flow. It seems like the PR campaign is out ahead of the science. H_Delon-3 cont.

So knowing that it's a significant impact to recreation, I don't think it's been addressed in any of the documents I've seen so far. I've hardly seen a mention of swimming on the river. This is a really important people habitat. Now, people need habitat for different reasons than fish. We don't get our food and shelter from the river, it's something -- it's more of a contribution to our sanity and our well-being that we get to go to the river and use it as a place to have recreation, and for fishing. H_Delon-4

I don't want to see fish preservation at the expense of swimming. I don't want to see swimming at the expense of fish. Both activities are important and fish are important by themselves without us fishing them. H_Delon-5

So that's my comment. It seems that the estuary, the idea of the closed lagoon with the freshwater stream running through it sounds good for fish. It seems like it needs more study as far as other creatures, from what I've been reading. H_Delon-6

Thank you.

CHAIRMAN CARRILLO: Thank you, Ms. DeIonno.

Next speaker, Vesta Copestakes. And after Ms. Copestakes, Mike Frey.

Again, if there are any other blue cards in the audience, this would be a good time. H_Copes

MS. COPESTAKES: Do you have slide six and seven that look like they go back to see the entire area that is impacted by this, in essence?

First thing I want to say is that I'm really impressed with how much care and attention to detail you do. Just as the nature of all the things that -- all these meetings I've gone to, and the Water Agency, all the people, the scientists get out in their little boats and put their meters down and all the rest of it, I'm very impressed with how much they care as much as how much they pay attention to detail. That's a wonderful thing. I think your intent is really positive. H_Copes-1

The only concern I really have beyond that is the flow of the river, how that does impact what you are doing. It seems like there's an awful lot of attention that is paid to the nine properties with the stunning view that I'm thoroughly envious of, but I'm not too much because they get flooded, quite frankly. H_Copes-2

I would be more concerned about the flow of my

1 river and the health of my fish and the health of all
2 the other creatures involved than I would about the
3 people in those houses, because they could raise those
4 houses. And maybe there's some kind of money in all of
5 this that would say, if we are going to have such a
6 serious impact on our river and our communities and all
7 of the critters and people upstream from those nine
8 houses that we could simply say, Raise your houses, and
9 that will take care of a lot, and raise a few properties
10 that need to simply be brought up. I live near the
11 river and we bring houses up all the time to get out of
12 the way. So that would be the one suggestion I would
13 have.

H_Copes-2 cont.

14 And the other one is the concept of can we
15 bring all of these EIRs and studies that we are doing
16 together in one study, one document, before we make any
17 final decisions, so that this one piece is not isolated
18 from another piece, it's not isolated from another
19 piece. And you are going to have to keep going on to
20 study what you are doing in the process, but just please
21 consider that they all come in together.

H_Copes-3

22 When you look at this image you see a huge area
23 with the watershed, and everything in that watershed is
24 impacting that river, and all the way down to the end.
25 And all along that river are failing septic tanks, tons

H_Copes-4

and tons and tons of failing septic tanks, and problems, and vineyards, and lots of things putting chemicals and other unnatural substances into the water. H_Copes-4 cont.

And, no, we don't know what the natural flow of the river is, we don't know what the natural mouth of the river is, and until we do something like take the jetty out we are not going to know whether the jetty has an impact or not. H_Copes-5

So that's the one thing I would say, is study the whole thing, the whole picture, before you come to any final conclusions.

Thank you.

CHAIRMAN CARRILLO: Thank you, Ms. Copestakes.

Next speaker, Mike Frey.

And I do not have any other blue cards or speaker cards after Mike. So if you do intend to speak or provide comments on the Draft EIR, ask that you fill out a blue card now. H_Frey

MR. FREY: Hi, I'm Mike Frey, Surfrider Foundation. I've been hitting the beaches here every week for about 35 years. I've got my own concerns, but I've written -- we have written most of what we want to talk about here based on our collective thoughts.

The Sonoma County Coast Chapter Surfrider Foundation strongly believes the Sonoma County Water H_Frey-1

1 Agency, their Draft Environmental Impact Report for
2 their Russian River Estuary Management Plan fails to
3 adequately address negative impacts on surfing
4 activities. SCWA's Estuary DEIR admits that
5 implementing the proposed outlet channel to control the
6 estuary water releases to maintain a closed lagoon for
7 the steelhead habitat will cause surfing activities to
8 occur less frequently. The quality and availability of
9 the waves at the river's mouth in the Goat Rock area to
10 the south largely depends on the influx of new sand and
11 gravel.

H_Frey-1 cont.

12 Surfrider has determined that the mouth of the
13 Russian River is a high-quality surfing location and
14 legally protected under the California Coastal Act
15 Section 30213. The act states, Lower cost visitor and
16 recreational facilities shall be protected, encouraged,
17 and where feasible, provided. Developments providing
18 public recreational opportunities are preferred.
19 Surfing locations are prime examples of low cost visitor
20 and recreational opportunities.
21 The Coastal Act Section 30220 further states
22 that, Coastal areas suited for water-oriented
23 recreational activities that cannot readily be
24 provided inland, water areas shall be protected for such
25 uses. Surfing in Sonoma County can only be practiced in

H_Frey-2

the ocean and never in inland areas. The Surfrider Foundation and organization and supporters are particularly protective of surfing locations on the Sonoma Coast, especially the high quality ones that are available to the public in very limited supply, and the river mouth is one of them. H_Frey-2 cont.

To quote the SCWA DEIR impact 4.72, Eliminate or modify an existing recreational resource. Quote, The proposed project would likely reduce the occurrence of open channel tidal conditions conducive to surfing activities. It goes on to say that, This potential impact may be inconsistent with the California Coastal Act, end quote. And no feasible mitigation features are identified. H_Frey-3

Local surfers have informed our organization that to date their concerns and interests have not been satisfactorily addressed by the Water Agency, nor the public comment process, and will be tracking this carefully. H_Frey-4

The other thing I want to address is I think there's been very, very little baseline activity at all put together for the E. coli and the other nutrients that are in the estuary area at the mouth of the river. From most of the stuff we have looked at, there's been no testing whatsoever going on out there for quite H_Frey-5

sometime. I think things need to go much deeper than Duncans Mills. H_Frey-5 cont.

The other thing is, I believe that until we get rid of that jetty that's put in there, we will not have anywhere near a natural environment there, and we have to start establishing those things all the way down the river. H_Frey-6

And fortifying anything at the coast is crazy. Any properties down there that get flooded naturally, shouldn't be there. When they get flooded, take them out. H_Frey-6

Thank you.

CHAIRMAN CARRILLO: Thank you, Mr. Frey.

I thought you may have been the last speaker, but I got two more speaker cards here before me. Larry Hanson, and after Mr. Hanson, Mr. Thomas Yeates.

MR. HANSON: Hello. I'm Larry Hanson, H_Hanso Forestville.

On many coast walks I pass by many natural river mouths and observe the interface of the ocean. A coast walk, the idea is to cross the beach by crossing the river is the quickest way through the sand to the open ocean. In general, I observed that the mouths that I've been crossing are wide open, sandy areas, and that the final channel to the ocean is dynamic and changing.

1 At the Russian River mouth there are three main
2 factors that make the process unnatural. One is, the
3 mouth, the river flow that is artificially controlled
4 from Coyote and Warm Springs dams.
5 The second is the barrier structure that
6 prevents some of the dynamic action of the natural river
7 mouth.
8 And the third is the low-lying structures that
9 artificially restrict the depth of the estuary.
10 So with the Biological Opinion in place,
11 there's been an attempt by agencies to partially mimic
12 nature by artificially channelizing the river at an
13 oblique angle. This was supposed to keep the estuary at
14 a certain depth needed for the fish. However, that
15 attempt failed.
16 So it is clear, from my point of view, that
17 putting the machinery at the mouth and artificially
18 channelizing, that harasses and disrupts wildlife, has
19 to be stopped completely and forever. This is the
20 highest priority.
21 What needs to be done, once this is
22 established, will follow. To truly mimic natural
23 processes the structures that impede the depth of the
24 estuary need to be raised or removed. The artificial
25 structure, or whatever it's called, the dams that people

H_Hanso-1

H_Hanso-2

1 call it, that prevents a wide beachfront, needs to be
2 removed.
3 Once the Russian River mouth is naturalized
4 there's only one main variable left, and that is flow
5 manipulation from the dams' releases. This brings up a
6 huge deficiency in the Biological Opinion. The BO left
7 out consideration of impacts to the lower river, which
8 is Wohler to Bridgehaven approximately, by lowering
9 river flows to keep a few structures from flooding.
10 This is a big oversight for the river community
11 and the overall river ecosystem, and a possible
12 violation of CEQA laws.
13 However, by removing the barrier and flooding
14 structures at the river mouth so as to return to natural
15 behaving system, the Biological Opinion lower river flow
16 calculations can be adjusted higher than stated to not
17 impact water quality and many of the river benefits and
18 uses.
19 If this is not done the problem of wildlife
20 harassment will continue as agencies try to outguess
21 what the combination of ocean and river will do next.
22 The BO focus on developing a viable salmonid nursery
23 will not manifest itself. Flooding will still be an
24 issue. The lower river's flow -- flows in the lower
25 river will likely cause a myriad of problems for water

H_Hanso-2 cont.

H_Hanso-3

H_Hanso-4

H_Hanso-5

quality and the river economy. H_Hanso-5 cont.

But if the above were done, here are the benefits.

Wildlife not be harassed several times a year. The mouth will behave as many of the other coastal river mouths, providing an age-old natural estuary development for all wildlife, including salmonids. Flooding near the mouth will not be a constant issue, although the amount of flow will still be somewhat controlled by dam operators. The lower river will have adequate flows to maintain river health, and economic and recreation viability of our community. H_Hanso-6

Thank you.

CHAIRMAN CARRILLO: Thank you, Mr. Hanson.

Mr. Thomas Yeates. H_Yeate

MR. YEATES: Hi. I have a couple of observations I would like to share with the folks.

I've been to a number of these meetings, and there seems to be a gap that I think would be really great for you guys to try and bridge in your public relations with the environmental, long old-guard environmental community in the area who seem to have not been convinced that your approach is either complete or even honest, possibly. H_Yeate-1

I think in the future meetings it would be

1 fantastic if you could address this suspicion about what H_Yeate-1 cont.
2 is going to be done with the water.
3 There has been a long time -- I've been here,
4 lived in Jenner about 27 years, and soon after moving
5 here I met a lot of the prominent environmentalists in
6 the area who have been fighting to save the salmon runs
7 for all those years, who have done extensive volunteer H_Yeate-2
8 studying of the causes, various causes of the salmon
9 runs' decline. And I think it would behoove you to
10 incorporate all of their knowledge into your future
11 presentations, if for no other reason to avoid the
12 appearance that you are working at cross-purposes. And
13 so that's one aspect of it.
14 Another important thing is that in your
15 presentations it would be really smart to include your
16 analysis and your actions to discover the causes, and H_Yeate-3
17 what you are choosing to mitigate the causes of the
18 upstream impact on the salmon runs.
19 Many of us here feel that the biggest impact on
20 the salmon runs is not really the mouth of the river so
21 much, it's stuff that goes on upstream, the logging that H_Yeate-4
22 screwed up the, you know, the salmonid spawning areas,
23 and the pesticides in the runoff, and the whole myriad
24 of effects. Of the damming of the rivers.
25 All this stuff has been studied extensively by H_Yeate-5

Brenda and Darrell and a lot of people for many years, and it would behoove you to utilize their extensive studying of this and not work at cross-purposes of them where you've got, you know, wars going on in editorial columns, or whatever. Which I didn't follow, but I'm glad that's going on in lieu of a better road of communication.

But that would really help in your public relations, if nothing else, if you incorporate, particularly in your remarks, introductory remarks, address all those points right out of the gate, you know, where the water's going, why you are putting so much attention on what's going on at the mouth of the river here when whatever's going on in the river happens upstream. You know, that's what ends up here, is what happens upstream.

H_Yeate-5 cont.

I mean, maybe having a shallower, you know, overflow over the beach like you are proposing would be helpful, you know, maybe that's one factor, but there's a heck of a lot more impacting the salmon than that. Particularly since the salmon runs were still pretty darn high in the '60s when the estuary was pretty much like it is now as far as the breakwaters, and as Suki was describing was there, you know, back in the '60s, and they still had pretty high salmon runs. So that's

H_Yeate-6

not the only factor.

Another point that I thought you might want to go into is in that presentation, that first presentation there was a slideshow describing the way that the river had been managed, the mouth had been managed, and then it showed the proposed way that it wants, you want to manage it by having a shallower runoff rather than cutting a deep channel and then it drains like a bathtub. You want it to just flow over the top, therefore not draining all the water and having much tidal effect.

I think that was done last year, they tried that, but I didn't get out of the presentation how it went. Did it work? Was it even possible to make the estuary flow over the top gently and create the environment you wanted to create? I mean, it was done last year, that was it. So I just -- you might have incorporated that in the first presentation of, Yeah, we did it last year and it didn't work, or It worked some of the time or, you know. So that's my advice.

I'm sure you guys will be back, the Water Agency will be back doing another one of these presentations. I'm hoping next time maybe you can, you know, follow some of that.

Thanks.

H_Yeate-6 cont.

H_Yeate-7

1 CHAIRMAN CARRILLO: Thank you, Mr. Yeates.
2 Any other blue cards?
3 MS. FURCH: I want to thank those of you who H_Furch
4 have come to the coast. I'm sorry you didn't come in
5 the daytime; it's beautiful.
6 My name is Rue Furch. You don't have that yet.
7 A lot of people have said a lot of really good
8 things and made really good points about the whole
9 nature of this EIR.
10 My question to you is, can this EIR achieve the
11 goal as stated? If the EIR can't even get to the
12 objective, then we have a greater problem. And so the
13 goal statement I think is really important.
14 And I'm not at all sure if, for example, you H_Furch-1
15 took -- if you were a physician and somebody said, We
16 got a problem with your digestive system, you wouldn't
17 look just in one place to discover whether or not it was
18 working. You have to take into account the entirety of
19 the system, because it is a system.
20 When you have all the feeder streams that are
21 loaded with a whole manner of things, you know, a lot of
22 those have been discussed and presented, but one of the H_Furch-2
23 things we see is algae, enormous quantities every year
24 now, and that didn't used to be there. And it is partly
25 a function of low flow and it's partly a function of the

cover story being missing, and it's also a lot of pollutants that are now in the water that didn't used to be.

H_Furch-2 cont.

So if you take the end of any system and try and determine from that end how you can make a difference that will actually make -- there will not be affected by everything upstream. You got two systems that feed into the Russian. There's the Mendocino system and the Lake Sonoma system, and there are all the feeder streams, downstream there are all the agricultural uses, there are all the wells.

It is an enormously complex system and if you don't look at it systemically you cannot achieve the project objective.

H_Furch-3

CHAIRMAN CARRILLO: Are there any other speakers that want to participate in the public hearing aspect of the Draft EIR estuary plan?

Seeing none, I'm going to close the public hearing at this point.

First and foremost, I would like to say thank you to all the speakers who not only took the time to participate in this public hearing aspect of it, but also took the time to read the Draft EIR. And as stated by one of the speakers, it is a large document, a lot of information with many complexities, but I do recognize

1 and appreciate the effort that's been taken in not only
2 reading the plan or making an attempt to read the plan,
3 but also providing your comments to the directors of the
4 Water Agency as we look through this process.
5 And I also want to thank the members of the
6 audience for your patience, in not only the presentation
7 but also listening to the comments of your neighbors,
8 friends, and folks that are interested in this aspect of
9 the Biological Opinion.
10 At this point I will ask if director McGuire
11 and director Rabbitt have any comments and/or questions
12 at this point?
13 MR. McGUIRE: I want to say thank you very much
14 for having us out here tonight.
15 MR. RABBITT: Likewise. And I can assure you,
16 I took a lot of notes, as I tend to do in these
17 meetings, and I'm sure we will be addressing those as we
18 go forward.
19 Thank you, again.
20 CHAIRMAN CARRILLO: You know, it's the intent
21 of having had this public hearing out here to really
22 provide folks an opportunity, that are more directly
23 either related or have a more direct impact with these
24 processes, an ability to attend and participate,
25 recognizing holding the meetings in Santa Rosa isn't

always as amenable to traveling down there. So this was really an attempt by myself and by my two colleagues here to essentially provide this avenue through this public hearing.

And recognizing that the public hearing for comments, or the comment period is open through Valentine's Day, February 14th, at five p.m. So if you do have further comments, I think at least two or three speakers noted that they wanted to provide additional comments, you can do that, submit that in writing, as well as submit that via e-mail.

Before I adjourn the meeting, I do want to take a moment to thank David Kenly and the Jenner Community Club for being so gracious in allowing us to use your facility. It's a beautiful facility, and now you have a beautiful path to allow the fire department to exit and other folks to come here.

So David, thank you and the Jenner Community Club for allowing us to be here.

MR. KENLY: Thank you for your help with that, too.

CHAIRMAN CARRILLO: Absolutely. It's been a pleasure.

I would be remiss if I didn't acknowledge former Supervisor Mike Reilly who is in the audience.

Once again, thank you. The meeting of the Sonoma County Water Agency Board of Directors is now adjourned.

(The proceeding concluded at the hour of 8:06 p.m.)

REPORTER'S CERTIFICATE

I, Sharlene S. Nordstrom, a Certified Shorthand Reporter, do hereby certify that the foregoing transcript, pages numbered 1 through 77, inclusive, was reported by me, and transcribed by computer under my direction and control, and constitutes a true and complete transcript of said proceedings.

I hereby affix my signature this 26th day of January, 2011.

SHARLENE S. NORDSTROM
CSR #2861, CCRR #081

H_Water-1 The Draft EIR Chapter 2.0, Project Description, explains the proposed lagoon outlet channel will be created in the beach management zone, the area north of the jetty where current artificial breaching is conducted, and will avoid the area by the jetty.

H_Water-2 The Estuary Management Project effect on seepage through the barrier beach is addressed in Draft EIR Section 4.2, Hydrology and Flooding.

H_Water-3 The study of jetty removal is included in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

H_Water-4 The potential impact related to tsunami is included in the Draft EIR Chapter 4.2, Hydrology and Flooding, Impact 4.2.3. Sea level rise is addressed in Draft EIR Section 4.2, Hydrology and Flooding, and Chapter 5.0, Cumulative Analysis, page 5-2.

H_Water-5 This comment is a statement and does not affect the environmental analysis in the Draft EIR; no revisions or text changes in the Final EIR are required.

H_Water-6 Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements,** in **Chapter 2, Master Responses**.

H_Sukov-1 The Public Policy Facilitating Committee (PPFC) meeting was held on December 13, 2010. The Draft EIR had not yet been released for public comment at the time of the meeting, nor was it a public hearing to obtain comments on the Draft EIR. The transcripts for the PPFC meetings are publicly available via the Water Agency website: www.sonomacountywater.org/RRIFR.

H_Sukov-2 This response clarifies that the commenter attended the scoping meeting for Estuary Management Project at the Jenner Community Center on May 19, 2010, and not the scoping meeting on May 20, 2010 at the Sonoma County Permit and Resource Management Department meeting room. The other scoping meetings referenced in the comment were for a different project.

H_Sukov-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

The Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific project objectives of the proposed Estuary Management Project are established in Draft EIR Chapter 2.0, Project Description, and include

providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimizing flood hazards.

H_Sukov-4 Please refer to response to comment NA_Sukov-16.

H_Adelm-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_Adelm-2 Please refer to response to comments G_DOW-6 and G_RRWPC-25.

H_Adelm-3 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

H_Adelm-4 This response acknowledges the photo report submitted during the Notice of Preparation scoping period.

H_Adelm-5 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Draft EIR Section 4.2, Impact 4.4.2 includes an analysis of flooding impacts to property and infrastructure.

H_Adelm-6 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. For a discussion on water quality, include nutrients, *Ludwigia* and algal blooms, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

H_Adelm-7 Draft EIR Chapter 3.0, Project Background and Environmental Setting, provides environmental setting/existing conditions information based on best available data. For a discussion regarding mitigation, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility,** in **Chapter 2, Master Responses**.

H_Adelm-8 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for a discussion related to the Estuary Management Project impact to water quality. Under CEQA, baseline conditions are considered the physical conditions at the time of the Notice of Preparation. The Draft EIR concludes that there is a potentially significant and unavoidable impact associated with bacteria levels in the Estuary during the lagoon management period.

H_Adelm-9 Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**, for discussion of potential effects to water quality and secondary effects related to algae blooms.

H_Adelm-10 Potential changes in water temperature are addressed in Draft EIR Section 4.3, Impact 4.3.2. For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

H_Adelm-11 Potential change in dissolved oxygen is addressed in Draft EIR Section 4.3, Impact 4.3.2. For additional discussion, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

H_Adelm-12 No response or text revisions are necessary.

H_Adelm-13 For a discussion of Draft EIR's characterization of existing water quality conditions in the Estuary and impacts analyzed in the Draft EIR, refer to Draft EIR Chapter 3.0, Project Background and Environmental Setting, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of adequacy of the EIR analysis, refer to **Master Response 2.7, CEQA Statutes: Adequacy of EIR Analysis**, in **Chapter 2, Master Responses**. As the comment does not specify any particular use of that term in the Draft EIR, a specific response is not possible.

H_Hardy-1 The Draft EIR recognizes a variety of aquatic and terrestrial species rely on estuarine habitat for some or all of their life phases. Draft EIR Section 4.5, Fisheries, includes analysis of other non-protected aquatic species, including Dungeness crab. Draft EIR evaluated the potential impacts on pinnipeds occupying the beach haulout site. For this assessment, refer to Impact 4.4.1, Special-Status Plant and Animal Species, Marine Mammals, on page 4.4-69. Additionally, the Draft EIR evaluated the potential impacts on pinnipeds occupying the beach haulout site, as well as haulouts located within the mainstem of the Russian River Estuary. For this assessment, refer to Impact 4.4.8, Protected Marine Mammals, on page 4.4-79. Refer to response to comment NA_Burge-8 for a discussion of other common fish species in the Estuary.

H_Hardy-2 This response acknowledges the commenter's concern for scope of authority of the Endangered Species Act.

H_Hardy-3 The Draft EIR is prepared in accordance with CEQA and provides an analysis of potential project-related environmental impacts analyzed under the CEQA Guidelines criteria.

H_Jelli-1 Refer to response to comment H_Hardy-1 for information about the range of aquatic and terrestrial species addressed in the Draft EIR.

H_Jelli-2 Water Agency activities conform to the conditions and monitoring measures established in the NMFS IHA to avoid and minimize impacts on pinnipeds at the Jenner haulout. These measures are listed on Draft EIR pages 4.4-69 through 4.4-71 in Impact 4.4.1. The Estuary Management Project will require an IHA from NMFS and will incorporate the same conditions and monitoring measures. Mitigation Measure 4.4.8 details an adaptive monitoring plan that will be implemented in compliance with the NMFS IHA. Conditions are established in the IHA to avoid and minimize effects to harbor seals and their haulout, and all activities associated with Estuary management are subject to these conditions. The Draft EIR considered the IHA, drafted by government scientists and regulators with the responsibility of species protection, represents a reasonable approach for mitigating impacts and its provisions were consequently adopted. Under this adaptive monitoring plan, seal counts will continue to be conducted at the Jenner haulout and nearby coastal and river haulouts. If monitoring indicates decreases in overall use at the Jenner haulout are correlated with increases in use at the three closest haulouts, the Water Agency will consult with NMFS and CDFG to alter the Estuary Management Plan such that the haulout site is maintained as a resource. The IHA does not allow long-term harassment or alteration of habitat conditions that would contribute to abandonment of the Jenner haulout. The IHA, drafted by government scientists and regulators with the responsibility of species protection, represents a reasonable approach for mitigating impacts and its provisions were consequently adopted, recognizing the criteria listed by the comment.

H_DeIon-1 This response acknowledges the commenter's position.

H_DeIon-2 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_DeIon-3 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, please refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_DeIon-4 The Draft EIR does not address impacts to swimming because the Estuary Management Project will not eliminate swimming opportunities available in the Russian River.

H_DeIon-5 The Estuary Management Project is intended to balance all interests on the Russian River.

H_DeIon-6 Draft EIR considered potential impacts to quality of the river from an environmental resource perspective, and analyzed a range of resources including

geology, hydrology, water quality, biological resources, fisheries, land use, recreation, cultural resources, noise, air quality, hazards and hazardous materials, public services and utilities, and aesthetics.

H_Copes-1 For a discussion of the relationship of the Estuary Management Project to the Fish Habitat Flows and Water Rights Project, refer to **Master Response 2.1, Relationship to other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_Copes-2 The Alternatives Analysis in Chapter 6.0 of the Draft EIR includes an Alternative Flood Management alternative to the Estuary Management Project. For additional discussion, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

H_Copes-3 Comment asserts all EIRs and studies should be considered in one environmental document. Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_Copes-4 The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. Analysis of other issues within the Russian River watershed, including those listed by the commenter, is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

H_Copes-5 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a jetty study plan to analyze the effects of the Russian River Estuary on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

H_Frey-1 Recreational resources, including surfing and river beach access are addressed in the analysis provided in Draft EIR Section 4.7, Recreation. For additional information, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

H_Frey-2 For additional information about California Coastal Act policies, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

H_Frey-3 For a discussion regarding mitigation and compliance with a mitigation program, refer to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses.**

H_Frey-4 For discussion regarding the public process, refer to **Master Response 2.8, Public Participation**, in **Chapter 2, Master Responses**.

H_Frey-5 The Draft EIR Section 4.3, Water Quality, provides the best available information as the baseline for the water quality analysis. Refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**. For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses**.

H_Frey-6 The Estuary Management Project does not include a specific component for jetty removal. As described in Draft EIR Chapter 6.0, Alternatives Analysis, the Water Agency does not own, maintain, operate, or have jurisdiction over the jetty structure, and is therefore not authorized to make policy decisions for action to remove the jetty. However, the Water Agency is required by the Russian River Biological Opinion to develop a jetty study plan to analyze the effects of the Russian River Estuary on Estuary water levels and on beach morphology, as well as evaluate alternatives that modify the jetty to achieve target estuarine water levels. This is included as a potential alternative to the Estuary Management Project in Draft EIR Chapter 6.0, Alternatives Analysis. For additional discussion regarding feasibility and uncertainty of outcomes of jetty removal, refer to **Master Response 2.5, Alternatives Analysis**, and **Master Response 2.2, Project Description and Impact Areas**, in **Chapter 2, Master Responses**.

H_Frey-7 Refer to **Master Response 2.2, Project Description and Impact Areas and Scope of Analysis**, and **Master Response 2.3, Project Objectives and Feasibility**, in **Chapter 2, Master Responses**.

H_Hanso-1 No revision or text changes necessary. This response assumes the comment refers to the 2010 implementation of the lagoon outlet channel.

H_Hanso-2 The relevant resource analyses in the Draft EIR, Chapter 4.0 Environmental Setting, Impacts, and Mitigation Measures, include a discussion of impacts associated with lagoon outlet channel creation. The proposed Estuary Management Project is intended to relieve some of the impacts associated with artificial breaching. With respect to the jetty that prevents a wide beachfront must be removed. The Jetty Removal Alternative is identified and evaluated in

Draft EIR Chapter 6.0, Alternatives Analysis. For a discussion of the range of alternatives, refer to **Master Response 2.5, Alternatives Analysis**, in **Chapter 2, Master Responses**.

H_Hanso-3 Comment asserts low flow should not be implemented to provide Flood management. Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**.

H_Hanso-4 Comment supports jetty removal to avoid impacts to water quality and recreational uses. Environmental tradeoffs among alternatives are explained in Draft EIR Chapter 6.0, Alternatives Analysis.

H_Hanso-5 Refer to **Master Response 2.1, Relationship to Other Biological Opinion Elements**, and **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

H_Hanso-6 This response acknowledges the commenter's position.

H_Yeate-1 Comment regarding public process. For a summary of process requirements under CEQA, refer to Draft EIR Chapter 1.0, Introduction. Refer also to **Master Response 2.8, Public Review Process**, in **Chapter 2, Master Responses**. The Biological Opinion analyzed the impacts of the Water Agency's water supply, flood channel maintenance, and Estuary management activities on listed salmonid species, and the incidental take statement in the Biological Opinion covers all such activities. The specific project objectives of the proposed Estuary Management Project are established in Draft EIR Chapter 1.0, Introduction, and include providing enhanced rearing habitat for juvenile salmonids within the Russian River Estuary and minimizing flood hazard.

H_Yeate-2 Please refer to **Master Response 2.8, Public Participation**, in **Chapter 2, Master Responses**. No response or text changes are required.

H_Yeate-3 This response assumes this comment is directed toward the public presentation, not the Draft EIR. The Draft EIR includes all CEQA-required environmental analyses, assessment methodology, conclusions, and mitigation. Refer also to **Master Response 2.6, Recreational Impacts, Socioeconomic Impacts and Mitigation Feasibility**, in **Chapter 2, Master Responses**.

H_Yeate-4 The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. Analysis of other issues within the Russian River watershed, including those listed by the commenter, is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

H_Yeate-5 Refer to Draft EIR Chapter 1.0, Introduction, page 1-3 for the purpose of the project. Refer to responses to comments H_Yeate-1, H_Yeate-2, and H-Yeate-4.

H_Yeate-6 The Draft EIR provides analysis and disclosure of potential environmental impacts associated with the proposed project. Analysis of other issues within the Russian River watershed, including those listed by the commenter, is beyond the scope of analysis for this EIR. The Water Agency does not have decision-making authority over logging, gravel mining, vineyard conversion, or chemical pollutant discharge.

H_Yeate-7 The slides the commenter refers to are included in graphics Figure 2-7 (page 2-17) and Figure 2-8 (page 2-18) in Draft EIR Chapter 2.0, Project Description. The Draft EIR Figure 2-9 (page 2-20) includes photographs of the July 2010 outlet channel implementation. Suggests future presentations discuss if outlet channel implementation worked.

H_Furch-1 The Estuary Management Project is intended to achieve the objectives defined in the Draft EIR Chapter 1.0, Introduction, page 1-3. Refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**.

H_Furch-2 Please refer to **Master Response 2. 1, Relationship to Other Biological Opinion Elements**, in **Chapter 2, Master Responses**. Similarly, the project does not control or contribute to pollution sources. For additional water quality information, refer to **Master Response 2.4, Water Quality**, in **Chapter 2, Master Responses**.

H_Furch-3 For a discussion of the geographic extent of the project area analyzed under the Estuary Management Project, please refer to **Master Response 2.2, Project Description, Impact Areas and Scope of Analysis**, in **Chapter 2, Master Responses.** For a discussion regarding project feasibility, please refer to **Master Response 2.3, Project Feasibility**, in **Chapter 2, Master Responses**.

3.5 References

Bond, M. H., S. A. Hayes, C. V. Hanson, and R. B. MacFarlane. 2008. Marine survival of steelhead (Oncorhynchus mykiss) enhanced by a seasonally closed estuary. Canadian Journal of Fisheries and Aquatic Sciences 65:2242–2252.

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National Marine Fisheries Service (NMFS), *Biological Opinion for Water Supply, Flood Control Operations, and Channel Maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River Watershed*, September 24, 2008.

National Marine Fisheries Service (NMFS), Environmental Assessment for the Issuance of Incidental Take Authorizations to the Sonoma County Water Agency for Russian River Estuary Management Activities, March, 2010.

Sonoma County Environmental Health Division, Ocean Water Quality Monitoring, Weekly Results, 2005-2011 available online: http://www.sonoma-county.org/health/eh/ocean_testing.htm , 2011.

Sonoma County Water Agency (SCWA) and Merritt Smith Consulting, *Biological and Water Quality Monitoring in the Russian River Estuary, 2000*, Fifth Annual Report, June 12, 2001.

Smith, J.J. The effects of the sandbar formation and inflows on aquatic habitat and fish utilization in Pescadero, San Gregorio, Wadell, and Pomponio creek estuary/lagoon systems, 1985-1989. Department of Biological Sciences, San Jose State University, San Jose, California, 1990.

Sonoma County Water Agency (SCWA), 2010a, Estuary Fisheries Report, February 2010.

CHAPTER 4
Revisions to the Draft EIR

4.1 Revisions to the Draft EIR

The text changes presented in this chapter were initiated by Lead Agency staff or by comments on the Draft EIR. The changes are in the order they appear in the Draft EIR and include text corrections to the Draft EIR in cases where the error may cause misinterpretation of the information. Throughout this chapter, newly added text is shown in underline format, and deleted text is shown in strikeout format.

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1. The text on page ES-23, Table ES-2, of the Executive Summary of the Draft EIR under Mitigation Measures 4.4.3 and 4.4.4 has been corrected as follows:

4.4.3. Short-term impacts to Waters and Wetlands. Creation and maintenance of the lagoon outlet channel could adversely affect federal and state jurisdictional waters.	Implement Mitigation Measure 4.4.1b.	~~LTS~~ LSM
4.4.4. Short-term impacts to Wildlife Movement and Nursery Sites. Creation and maintenance of the lagoon outlet channel could interfere with wildlife movement or impede the use of nursery sites.	Implement Mitigation Measure 4.4.1b.	~~LTS~~ LSM

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2. The text on page ES-29, Table ES-2, of the Executive Summary of the Draft EIR under Mitigation Measure 5.1 has been revised as follows:

CUMULATIVE		
5.1: Short-term (Construction-related) Cumulative Impacts. Concurrent construction of the projects within the Russian River Watershed in northern Sonoma County could result in cumulative short-term impacts associated with construction activities.	~~None Required.~~ Mitigation Measures in Chapter 4.0	LSM

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3. The text on page ES-29, Table ES-2, of the Executive Summary of the Draft EIR under "Public Services and Utilities and Public Safety" heading has been revised as follows:

4.13.3: Public Safety. The Estuary Management Project could substantially affect public safety at the outlet channel location during channel creation.	4.13.~~1~~3: Following outlet channel creation or artificial breaching, the Water Agency will install semi-permanent signage notifying beach users of channel conditions, potential for safety hazards from beach erosion or hydrologic action, and emergency contact information. Signage should be posted and maintained at key locations, such as the parking lot at Goat Rock State Beach Parking lot, the unofficial beach access trail located on the north side of the beach off Highway 1, and 100 feet on either side of the outlet channel.	LTS

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4. The text on page 2-29, Project Description of the Draft EIR has been revised to include a footnote clarifying the California State Lands Commission permit information:

" 2.7.2 Existing Permits and Agreements

The Water Agency currently manages the artificial breaching of the barrier beach in compliance with a number of federal and State permits and agreements. These include authorizations from NMFS, USACE, State Parks, the California State Lands Commission, the California Coastal Commission, CDFG, and North Coast Regional Water Quality Control Board (NCRWQCB). Specifically, these permits and agreements include:

1. NMFS Marine Mammal Protection Act Incidental Harassment Authorization
2. USACE Clean Water Act Section 404 Permit (File No. 221211N)
3. California State Parks temporary use permit
4. State Lands Commission General Lease for Public Agencies (PRC 7918.9)[1]

Since 1996, the Sonoma County Water Agency ~~possesses~~ operated artificial breaching under a general rent-free land use lease permit issued by the CSLC, in accordance with Article 2 of the Leasing and Permitting Regulations, to conduct artificial breaching within CSLC jurisdiction (CSLC, 2007). The Water Agency's most recent lease expired as of December 31, 2010 and an application for renewal of this land use lease is pending review by CSLC. However, this lease has a hold-over clause that provides a month-to-month lease while a new lease is under review. The Water Agency submitted a lease application prior to the December 31, 2010 expiration of the existing lease."

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5. The text on page 3-8, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.5.1, "Monitoring Programs", has been clarified as follows:

> "The Russian River Biological Opinion requires the Water Agency continue fisheries and water quality monitoring in the Estuary and maximum backwater area, as well as requires invertebrate sampling to better understand juvenile steelhead prey resources in the Estuary and how these resources may be affected by summer lagoon management."

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6. The text beginning on page 3-18, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Estuary Fish Habitat", has been clarified as follows:

> "**Salinity**
> …Additionally, based on current breaching practices between May and October, these water quality characteristics can change rapidly within the project area. The following section summarizes the current trends for critical habitat water quality characteristics in the project area under the current artificial breaching regime based on monitoring data collected by the Water Agency (SCWA 2006, 2010, 2011a, 2011b).
>
> Water quality is generally of higher habitat value (lower temperatures and higher DO)… the length of time the barrier beach remains open. This cycle was documented in the Estuary during ongoing monitoring studies conducted by the Water Agency (SCWA, 2006, 2010, 2011a, 2011b)."

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7. The text on page 3-20, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Open Estuary Conditions", has been clarified as follows:

> "***Open Estuary Conditions***
> …In the middle Estuary, salinities can range as high as 30 ppt in the saltwater layer, with brackish conditions prevailing at the upper end of the salt wedge, to less than 1 ppt in the freshwater layer on the surface (SCWA 2011a, 2011b). Salinities near the mouth are similar to ocean salinities (SCWA, 2006; SCWA, 2009)."

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8. The text on page 3-20, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Open Estuary Conditions", has been clarified as follows:

"Dissolved Oxygen

The DO levels in the Estuary fluctuate significantly during the monitoring season, and fluctuations are not necessarily associated with tidal cycles or a diurnal cycle (SCWA, 2006). DO levels in the Estuary also depend upon factors such as the extent of diffusion from surrounding air and water movement, including freshwater inflow (SCWA 2011a, 2011b). DO levels are also a function of nutrients, which can accumulate in standing water during an extended period of time and promote excessive plant and algal growth that utilize the DO (SCWA 2011a, 2011b). This can reduce DO levels leading to eutrophication and affecting overall ecological health of the Estuary."

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9. The text on page 3-21, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Closed Estuary Conditions", has been clarified as follows:

"Salinity

Typically salinity steadily increases from the freshwater/estuary interface in the upper reach with low salinity (0-5 ppt), to a predominantly saline environment with a thin freshwater layer that flows over the denser saltwater in the lower and middle reaches of the Estuary. When the barrier beach is formed at the mouth of the Estuary, saltwater is trapped in the lagoon and water quality conditions can undergo abrupt alteration (SCWA 2011a, 2011b). Salinity, DO and temperature changes can begin within 24 hours (SCWA 2006, 2010, 2011a, 2011b). The freshwater layer begins to thicken at the surface, starting at the mouth and extending upstream. Highly saline conditions are present in the mid and bottom depths of the lower and middle reaches of the Estuary within a few days of barrier beach closure (SCWA 2011a, 2011b)."

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10. The text beginning on page 3-21, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Closed Estuary Conditions, Dissolved Oxygen", has been clarified as follows:

"**Dissolved Oxygen**

…When the mouth closes, salinity stratification results in pronounced DO stratification in the closed lagoon (SCWA 2011a, 2011b). DO fluctuations increase in the mid and upper depths and the bottom depths experience sharp drops in DO concentrations. Data from 1996 to 2000 monitoring indicates stratification, with hypoxic to anoxic conditions in the near-bottom layers of the Estuary within a few days of closure. Supersaturation, hypoxic, and anoxic events were observed, with prolonged hypoxic and anoxic events occurring ~~at the bottom~~ in the deeper portions of the Estuary through the duration of Estuary closure (SCWA 2011a, 2011b).

Decreasing DO concentrations were also observed in the middle layers of the water column during barrier beach closures. In deeper pools, DO typically drops to less than 5 mg/l (SCWA 2006; NMFS, 2008). However, DO levels in the freshwater layer at the surface in the Estuary did not appear to be negatively impacted by Estuary closure and remained similar to pre-closure conditions, or increased in some instances (SCWA, 2006; SCWA, 2011a, 2011b)."

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11. The text on page 3-22, Draft EIR Chapter 3.0 Project Background and Environmental Setting, under heading 3.6.2, "Current Estuary Management and Fish Habitat, Closed Estuary Conditions", has been clarified as follows:

"Temperature

Because saltwater trapped in the lagoon is denser than freshwater it forms a layer under the fresh water … the effects of solar heating, a hot mid-depth layer of saline to brackish water subject to the effects of solar heating, and a relatively warm freshwater layer on the surface (SCWA 2011a, 2011b)… Because the barrier beach is breached soon after closure under current practices, the duration of low DO and high temperature conditions within the lower water column are generally limited to approximately two weeks or less, however a 29-day closure did occur in 2009. Data from the monitoring surveys conducted by the Water Agency (2006, 2011a, 2011b) show that water quality in near-bottom layers and in deep pools is typically better when the barrier beach is open than when it has been closed for a short period of time (two weeks; Entrix, 2004)… The water quality monitoring studies described here have, to date, only monitored water quality during short periods of barrier beach closure (~~typically two weeks~~ up to 29 days). The Estuary has not been closed for longer time periods after mouth closure and creation of a freshwater lagoon has not been observed. Additionally, the monitoring conducted by the Water Agency (SCWA, 2005, 2006, ~~and~~ 2010, 2011a, 2011b) provides a general assessment of water quality changes in the Estuary, but does not assess the extent of microhabitat within the Estuary that may provide refugia for salmonids and other aquatic species (Entrix, 2004)."

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12. The following references on page 3-31, Draft EIR Chapter 3.0 Project Background and Environmental Setting, have been added as follows:

Sonoma County Water Agency (SCWA). 2011a. Russian River Biological Opinion Status and Data Report Year 2009-10. Manning, D.J., and J. Martini-Lamb, editors. February 28, 2011.

Sonoma County Water Agency (SCWA). 2011b. Russian River Biological Opinion Status and Data Report Year 2010-11. J. Martini-Lamb and D.J Manning, editors. June 2011.

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13. The text on page 4.3-3 of Draft EIR Section 4.3, Water Quality, has been clarified as follows:

"Sampling Program Summary

The Water Agency conducted water quality monitoring from April or May of each year through the spring, summer, and fall (SCWA, 1996; 1997; 1998; 1999; 2005; 2011). Current water quality monitoring efforts include data collection at ~~six~~ nine stations in the Estuary including seven stations in the mainstem and two stations in tributaries (refer to **Figure 4.3-1**): the Mouth of the Russian River at Goat Rock State Beach (Mouth Station); Patty's Rock upstream from Penny Island (Patty's Rock Station); Bridgehaven just downstream from the Highway 1 bridge (Bridgehaven Station); the mouth of Willow Creek, which flows into the mainstem just upstream of Bridgehaven (Willow Creek Station); in the pool downstream of Sheephouse Creek (Sheephouse Creek Station); a pool next to an area known as Heron Rookery approximately halfway between Sheephouse and Freezeout creeks (Heron Rookery Station); ~~and~~ downstream of Freezeout Creek (Freezeout Creek Station); downstream of the first steel bridge in lower Austin Creek, which flows into the mainstem above Duncans Mills (Austin Creek Station); and in Monte Rio downstream of Dutch Bill Creek.

Multi-parameter, continuously-recording water quality meters (sondes) were typically deployed during mid-April to mid-May and were retrieved prior to the onset of winter rains. Hourly data was collected on water temperature, dissolved oxygen (DO), salinity, pH, and specific conductance in 2005, 2006, 2007, 2008, 2009, ~~and~~ 2010, and 2011 (SCWA, 2009; 2011)"

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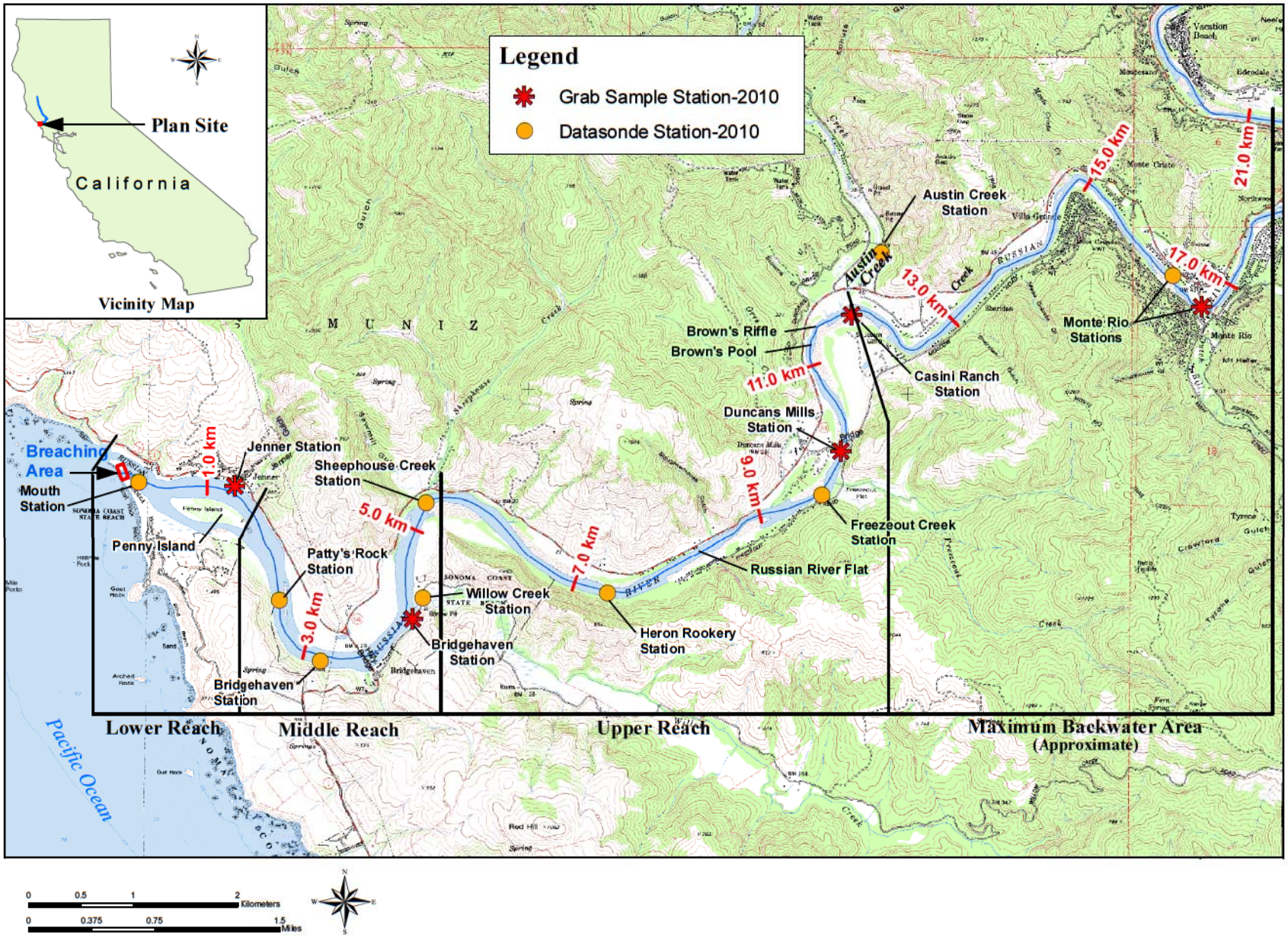
14. Figure 4.3-1a, Estuary Study Area and Maximum Backwater Area: Biological and Water Quality Sampling Locations, has been added to include an additional 2010 monitoring location and grab sample nutrient/bacteria/algae location in the maximums backwater area in Monte Rio. The revised figure is included below.



SOURCE: Sonoma County Water Agency, 2011

Russian River Estuary Management Project . 207734.01

Figure 4.3-1a

Estuary Study Area and Maximum Backwater Area: Water Quality Monitoring Stations - 2010

15. The text on page 4.3-7 of Draft EIR Section 4.3, Water Quality, “Indictor Bacteria” heading has been revised as follows:

> “In 2006, the California Department of Public Health (CDPH) developed the "Draft Guidance for Fresh Water Beaches", which describes bacteria levels that, if exceeded, may require posted warning signs in order to protect public health. The draft guidance was most recently updated in January 2011. The CDPH 2011 draft guideline for single sample values of total coliforms is 10,000 most probable number (MPN) per 100 milliliters (ml), and 400 MPN per 100 ml for fecal coliforms. The MPN for *Enterococcus* is 61 per 100 ml, and the MPN for *Escherichia coli* (*E. coli*) is 235 per 100 ml. However, it must be emphasized that these are draft guidelines, not adopted standards, and are therefore both subject to change (if it is determined that the guidelines are not accurate indicators) and are not currently enforceable. In addition, these draft guidelines were established for and are only applicable to fresh water beaches. Currently, there are no numeric guidelines that have been developed for estuarine areas.
>
> Sources of these bacteria include the natural environment (soils and decaying vegetation), stormwater, urban runoff, animal wastes (both wildlife and domestic animals), and human sewage. Analysis for total and fecal coliforms, *Enteroccoccus,* and *E. coli* bacteria are widely used as an indicator test. Coliform is a heading that describes a type of bacteria, which includes *E. coli*. ~~It~~Fecal coliform, including *E. coli*, is found within the intestines of warm-blooded animals, though most water contamination comes from cattle and people. *Enterococcus* is much like coliform bacteria, but is known to have a greater correlation with swimming-associated illnesses and is less likely to die-off in highly saline water. While these bacteria normally occur at low levels in the environment, high levels can indicate contamination (but do not cause illness) and the presence of other harmful pathogens. The 2009 sampling effort included analysis for Total Coliforms, *Enterococcus*, and *E. coli* and the 2010 effort included analysis for Total Coliforms, Fecal Coliforms, and *Enterococcus*. Sampling for *E. coli*, as was done in 2009, is often conducted as a surrogate for fecal coliforms.
>
> Analysis for levels of Total Coliforms, Fecal Coliforms, *Enterococcus,* and ~~*Escherichia*~~ *E. coli* are of primary concern. However, other measurements are taken in the field that can provide an indication of whether conditions of concern exist at the time of sampling including dissolved oxygen content, pH (hydrogen ion activity), conductivity (ionized or dissolved minerals in the water), water temperature, and turbidity (clarity).”

16. The text on page 4.3-8 of Section 4.3, Water Quality, has been clarified as follows:

> "Analysis for levels of Total Coliform, *Enterococcus*, and *Escherichia coli* are of primary concern. However, other measurements are taken in the field that can provide an indication of whether conditions of concern exist at the time of sampling including dissolved oxygen content, pH (hydrogen ion activity), conductivity (ionized or dissolved minerals in the water), water temperature, and turbidity (clarity). For example, a lower than normal dissolved oxygen reading can indicate the presence of decaying matter; a higher than normal turbidity could indicate a recent discharge of sediment; or a higher than normal conductivity reading could indicate the presence of a nonpoint source runoff of animal wastes (which are high in ionized salts).
>
> Sampling events in 2009 and 2010 indicate there is a large variation in indicator bacteria levels observed through the different sections of the Estuary. *Enterococcus* and *E. coli* counts were generally low, but were observed to occasionally exceed recommended values in ~~both open and~~ closed conditions. It is important to note that the draft guidance for beach postings applies only to freshwater beaches.
>
> However, in 2010, total coliform counts were not significantly elevated during mid-summer open conditions (except at the Bridgehaven Station) and instead were observed to be significantly elevated during closed conditions at the end of the management season and were accompanied by high counts of *Enterococci* and ~~E. coli~~fecal coliforms, as well."

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17. The text on page 4.3-11 of Section 4.3, Water Quality, under "North Coast Basin Plan" has been clarified as follows:

> "As previously noted with respect to indicator bacteria, the CDPH's "Draft Guidance for Fresh Water Beaches" describes bacteria levels that, if exceeded, may require posted warning signs in order to protect public health. The CDPH draft guideline for total coliforms is 10,000 ~~most probable number (MPN)~~ MPN per 100 ~~milliliters~~(ml), and 400 MPN per 100 ml for fecal coliforms. The MPN for *Enterococcus* is 61 per 100ml, and the MPN for *E. coli* is 235 per 100ml. However, it must be emphasized that these draft guidelines were established for and are only applicable to fresh water beaches. Currently, there are no numeric guidelines that have been developed for estuarine areas. In addition, these are draft guidelines, not adopted standards, and are therefore both subject to change (if it is determined that the guidelines are not accurate indicators) and are not currently enforceable."

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18. Table 4.3-3, Basin Plan Water Quality Objectives for Applicable Beneficial Use, on page 4.3-13 of Section 4.3, Water Quality, has been revised as follows:

TABLE 4.3-3
BASIN PLAN WATER QUALITY OBJECTIVES FOR APPLICABLE BENEFICIAL USES

Parameter/ Constituent	Water Quality Objectives	Applicable Beneficial Use or Designation[5]
Temperature	Not to exceed 5ºF () above naturally receiving water temperature	Cold and warm freshwater habitat
Bacteria (shall not degrade beyond the natural background levels) Fecal Coliform	Median fecal coliform concentrations based on a minimum of not less than 5 samples for any 30-day period shall not exceed 50/100 milliliter (ml) of sample Nor shall more than 10% of total samples during any 30-day period exceed 400/100 ml	Water contact recreation
Dissolved Oxygen (Russian River Hydrologic Unit)	Minimum – 7 mg/L 90% Lower Limit (1) – 7.5 mg/L 50% Lower Limit (2) – 10 mg/L	Cold and Warm freshwater habitat
Biostimulatory substances (nitrogen, phosphorus) Algal productivity (see below)	Waters shall not contain in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.	Water contact recreation
Additional Non-Basin Plan Criteria		
USEPA – Total Nitrogen (3)	0.38 mg/L	Recommended Criteria for aquatic life and recreation
USEPA – Total Phosphates (3)	0.022 mg/L	Recommended Criteria for aquatic life and recreation
USEPA – Chlorophyll *a* (3)	0.0018 mg/L	Recommended Criteria for aquatic life and recreation
CDPH – Total Coliform (4)	10,000 MPN/100 milliliters	Draft Guidance for Freshwater Beaches
CDPH – Fecal Coliform (4)	400 MPN/100 millilters	Draft Guidance for Freshwater Beaches
CDPH – Fecal Coliform (4)	400 MPN/100 millilters	Draft Guidance for Freshwater Beaches
CDPH – Enterococcus (4)	61 MPN/100 milliliters	Draft Guidance for Freshwater Beaches
CDPH – E. Coli (4)	235 MPN/100 milliliters	Draft Guidance for Freshwater Beaches

19. The text beginning on page 4.3-20 of Section 4.3, Water Quality, has been revised as follows:

"Nutrients and Indicator Bacteria

In 2010, the Water Agency collected water quality samples as part of the Temporary Urgency Change Petition Water Quality Plan for 2010 to review whether summer

time water quality exhibited high nutrient loads. Although the USEPA section 304(a) nutrient criteria were established for freshwater systems, and as such, are only applicable to the freshwater portions of the Estuary, they are being used in the absence of estuarine criteria. Total nitrogen concentrations in the upper estuary, including monitoring at Monte Rio, were predominantly below the USEPA criteria of 0.38 mg/L, with a few exceptions. Concentrations of approximately 0.4 mg/L were recorded at Monte Rio, Casini Ranch, and Duncans Mills~~Austin Creek, and Freezeout Creek~~ in June, when spring flows were still high from an above average rainfall season."

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20. The text on page 4.3-22 of Section 4.3, Water Quality, has been revised as follows

"Sampling events in 2009 and 2010 indicate there is a large variation in indicator bacteria levels observed through the different sections of the Estuary. These variations were observed to occur under both open and closed mouth conditions and may be seasonal as well. In 2009, total coliform counts were observed to be higher during open conditions in mid-summer than during closed conditions, including the 29-day extended closure at the end of the management season. All three stations sampled in 2009 had at least one total coliform value above the draft guidance for freshwater beach posting of 10,000 MPN/100ml during open conditions, with the highest value of 24,196 MPN/100 ml occurring at the Jenner station. Total coliform values in 2009 were relatively elevated during closed conditions, but not as high as during open mid-summer conditions, and the draft guidance was not exceeded at any station. Enterococcus and E. coli counts were generally low, but were observed to occasionally exceed recommended values in ~~both open and~~ closed conditions.

However, in 2010, total coliform counts were not significantly elevated during mid-summer open conditions (except at the Bridgehaven Station) and instead were observed to be significantly elevated during closed conditions at the end of the management season and were accompanied by high counts of Enterococci and ~~E. coli~~ fecal coliforms. During preliminary sampling events in June and July 2010, the total coliform counts in the Estuary ranged from a low of 30 MPN/100ml at the Monte Rio station to an estimated value of greater than 1600 MPN/100 ml at the Bridgehaven station. However, variability in total coliform counts were observed at all stations including Monte Rio, which had a high count of 900 MPN/100ml, and Jenner, which had a low count of 110 MPN/100ml during this same time period. As such, variability was also observed with Enterococcus and ~~E. coli~~fecal coliforms counts (SCWA, 2010)."

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21. The following reference has been added to Draft EIR Section 4.3, Water Quality, page 4.3-28, have been added as follows:

> Sonoma County Water Agency (SCWA), 2011. Russian River Biological Opinion Status and Data Report Year 2009-10, February 28, 2011.

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22. The text on page 4.4-64, Draft EIR Section 4.4, Biological Resources, has been revised as follows:

> "Since 1996, the Sonoma County Water Agency ~~possesses~~ operated under a general rent-free land use lease permit issued by the CSLC, in accordance with Article 2 of the Leasing and Permitting Regulations, to conduct artificial breaching within CSLC jurisdiction (CSLC, 2007). The Water Agency's most recent lease expired as of December 31, 2010, and an application for renewal of this land use lease is pending review by CSLC. However, this lease has a hold-over clause that provides a month-to-month lease while a new lease is under review. The Water Agency submitted a lease application prior to the December 31, 2010 expiration of the existing lease.

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23. Text on page 4.4-73, Draft EIR Section 4.4, Biological Resources, under the Impact 4.4.2 and Impact 4.4.3 headings has been revised as follows:

> **"Impact 4.4.2: Sensitive Natural Communities. The creation and maintenance of the lagoon outlet channel could adversely affect sensitive natural communities. (Less than Significant with Mitigation)."**
>
> **"Impact 4.4.3: Waters and Wetlands. Creation and maintenance of the lagoon outlet channel could adversely affect federal and state jurisdictional waters. (Less than Significant with Mitigation)"**

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24. The text reference to Table 4.4-2 on page 4.4-79, under Impact 4.4.8 in Draft EIR Section 4.4, Biological Resources, has been revised as follows:

> "Although a number of special-status plant and animal species are known or have the potential to occur within the Estuary Study Area (see **Tables 4.4-2** and **4.4-3**), few could be adversely affected by lagoon adaptive management. This discussion focuses on the plant and animal species considered and summarized in **Tables 4.4-2~~1~~** and **4.4-3** with a moderate to high potential to occur in the Estuary Study Area and those species that are primarily associated with freshwater marsh and riparian habitats, and open water habitat and beaches, gravel bars, and mudflats."

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25. Caption for Figure 4.4-13 on page 4.4-80, Draft EIR Section 4.4, Biological Resources, has been revised as follows:

> Photo 1: Pinniped (Harbor seal) access to Estuary during ~~created outlet channel, July 1, 2010~~ perched channel conditions. Water surface elevations had been elevated a week prior to the subsequent closure event.

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26. The text references in Impact 4.4.8, Draft EIR Section 4.4, Biological Resources, page 4.4-81 have been revised as follows:

> **"Impact 4.4.8: Protected Marine Mammals. Long-term adaptive management of the Estuary as a lagoon could adversely affect protected marine mammal species. (Significant and Unavoidable)**
>
> Lagoon adaptive management could adversely affect harbor seals… The Incidental Harassment Authorization (IHA) issued by NMFS under the Marine Mammal Protection Act (NMFS, 2010c) does not provide for long-term harassment or alteration of habitat conditions that would contribute to abandonment of the Jenner haulout, nor could such an authorization be expected in the future. Therefore, the potential impact for restricted access for a longer duration during the lagoon management period is considered less than significant with implementation of **Mitigation Measure 4.4.~~6~~8.**
>
> Harbor seals use regular haulouts located within the mainstem Estuary, including the Jenner (Penny) logs, Paddy's Rock, and Chalanchawi… Therefore, the potential inundation impact on interior river haulouts for a longer duration during the lagoon management period is considered to remain significant with implementation of **Mitigation Measure 4.4.~~6~~8.**
>
> As discussed previously in **Section 4.4.2**, **Setting**, Pinniped Haulouts, pinniped distribution and use of haulout locations is difficult to predict, as it is subject to several factors… It is anticipated that conditions resulting from the Estuary Management Plan would be consistent with the range of conditions currently experienced in the Estuary, and that its implementation would result in conditions that are more natural relative to observed conditions in other estuary systems on the West Coast. Implementation of Mitigation Measure 4.4.~~6~~8 below would reduce this impact to the degree feasible."

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27. The text reference in the first paragraph of Impact 4.4.9, Draft EIR Section 4.4, Biological Resources, page 4.4-82 has been revised as follows:

"This could change the jurisdictional limits of federal and state waters, including wetlands, in the Estuary. Because potential effects of the lagoon adaptive management on natural communities addressed freshwater marsh, which would be considered wetlands (see Impact 4.4.6~~7~~, Natural Communities), this discussion focuses on waters (i.e., open waters of the Russian River)."

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28. The text reference under Impact 4.4.10, Draft EIR Section 4.4, Biological Resources, page 4.4-83 has been revised as follows:

"Impact 4.4.10: Wildlife Movement and Nursery Sites. Long-term adaptive management of the Estuary as a lagoon could interfere with wildlife movement or impede the use of nursery sites. (Less than Significant with Mitigation)

The increased duration of inundation and potentially induced changes in vegetation community composition would not alter the ability of animals to move along the river edge. There would be no significant impact on the movement of wildlife along the Russian River corridor. There could be some adverse change in the availability of riverine marsh, tributary streams, or back-channel ponding for amphibian breeding (nursery) sites. In the wetland communities where these sites occur, the discussion in Impact 4.4.6 (Natural Communities) predicts a combination of offsetting increases or losses as the water is retained for longer periods and a potential increase in wetland communities (Coastal and Valley Freshwater Marsh), and hence no net loss of amphibian nursery sites. Impacts, and mitigation, associated with effects to pinniped movement and nursery sites, are discussed in Impacts 4.4.1 ~~and~~, 4.4.7, and 4.4.~~7~~8 above. The impact would be less than significant with implementation of **Mitigation Measures 4.4.1a, 4.4.1b,** and **4.4.~~6~~8**.

Mitigation Measures

See **Mitigation Measure 4.4.8**.

Level of Significance after Mitigation. Less than Significant.

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29. The text on page 4.5-23 of Section 4.5 Fisheries, has been revised as follows:

"Chinook salmon can begin immigrating as early as August (a few individuals), but peak migration into the Estuary is typically in November and December (Chase et al. 2005; Chase et al. 2007), after the proposed management period."

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30. The following references on page 4.5-27 of Section 4.5, Fisheries, have been added as follows:

"Chase, S., R. Benkert, D. Manning, and S. White. 2005. Sonoma County Water Agency's Mirable Rubber Dam/Wohler Pool Fish Sampling Program: Year 5 results 2004. December 31, 2005.

Chase, S.D., D.J. Manning, D.G. Cook, and S.K. White. 2007. Historic accounts, recent adundance, and current distribution of threatened Chinook salmon in the Russian River, California. California Fish and Game 93(3): 130-148."

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31. The text on page 4.6-6 of Section 4.6, Land Use and Agriculture, has been revised as follows:

"Since 1996, the Sonoma County Water Agency ~~possesses~~ operated artificial breaching under a general rent-free land use lease permit issued by the CSLC, in accordance with Article 2 of the Leasing and Permitting Regulations, to conduct artificial breaching within CSLC jurisdiction (CSLC, 2007). The Water Agency's most recent lease expired as of December 31, 2010, and an application for renewal of this land use lease is pending review by CSLC. However, this lease has a hold-over clause that provides a month-to-month lease while a new lease is under review. The Water Agency submitted a lease application prior to the December 31, 2010 expiration of the existing lease.

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32. The text on pages 4.7-3 and 4.7-9, of Section 4.7, Recreation, has been revised as follows:

"In the maximum backwater area, there is formal public access at Monte Rio Community Beach, Patterson Point Preserve, and Vacation Beach. Monte Rio Community Beach is located on a large bend in the river and offers picnic amenities and boat rental facilities. This location is frequently used for community gatherings. Patterson Point Preserve is located in Villa Grande and maintained by Friends of Villa Grande for public river recreation and restoration as a redwood and riparian area. Vacation Beach is located at Vacation Beach Road in Guerneville and has a seasonal dam during the summer recreation season that is removed over four days in late September" (page 4.73).

"Public beach access within the maximum backwater area is limited to Monte Rio Community Beach, Patterson Point Preserve, and Vacation Beach. Many of the beach areas occurring within the Estuary Study Area and maximum backwater area do not have formal public access. Inundation associated with higher water levels would reduce the amount of beach acreage available within the Estuary, and these conditions would

occur for a longer duration, depending upon performance of the outlet channel" (page 4.7-9).

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33. The text on page 4.8-4, of Section 4.8, Cultural Resources, has been revised as follows:

"In 1867 John Rule purchased 4,000 acres of Rancho Muniz at the mouth of the Russian River. The following year, Charles Jenner reportedly received permission from Rule to erect a small house on the north side of the Russian River and named the spot Jenner Gulch. In 1905 the Redwood Lumber Company mill was erected on the south side of the river. It was later rebuilt upriver at Duncans Mills. Jenner School opened in 1905 for children of the mill workers. In the 1920s the Penny brothers owned and lived on the 29-acre island in the Russian River (now called Penny Island; Twohy, n.d.). Following the death of one brother, the surviving Penny asked longtime friend Joe Santos to take care of him until his death and bury him on the island. In return the island was deeded to him. The Santos family built a house and lived on the island until 1948 (Schwaderer and Stardford, 1982; Twohy, n.d.). One coffin has been found on the island that may be associated with the Penny brother however this has not been substantiated (Schwaderer and Stardford, 1982:7)."

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34. The text on page 4.8-5, of Section 4.8, Cultural Resources, under the heading "Background Research and Records Search Results", has been modified to include the following:

"California State Land's Commission (CSLC) staff search the CSLC Shipwreck Database (Database) for possible shipwrecks in the Estuary Study Area. The Database lists that the schooner *Sovereign* was grounded at the Russian River in 1873. This information may have been taken from Marshall (1978), which states that the Sovereign was a "total loss at Russian River" on "1/1873" (Marshall, 1978:122). The CSLC Database lists the incident as 7/21/1873 with no additional information. It should be noted however that not all shipwrecks are listed in the CSLC Database and that shipwreck locations may be inaccurate."

Reference: Marshall, Don B., *California Shipwrecks: Footsteps in the Sea.* Superior Publishing Company, Seattle, 1978.

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35. The text on page 4.8-13, of Section 4.8, Cultural Resources, has been revised as follows:

"Impacts associated with ~~traffic and transportation~~ cultural resources are summarized and categorized as either "less than significant," "less than significant with mitigation," or "significant and unavoidable."

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36. The text on page 4.8-13, of Section 4.8, Cultural Resources, has been revised as follows:

"Mitigation Measure 4.8.1: The Water Agency will implement the following measure:

***Inadvertent Discovery of Historical and Unique Archaeological Resources*.** If discovery is made of items of historical or archaeological interest, the contractor or Water Agency staff shall immediately cease all work activities in the area (within approximately 100 feet) of discovery. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; ~~and~~ deposits of metal, glass, and/or ceramic refuse, and shipwreck remains. After cessation of excavation the contractor shall immediately contact the Water Agency, State Parks, ~~and~~ the U.S. Army Corps of Engineers, and the California State Lands Commission. The contractor shall not resume work until authorization is received from ~~both~~ all agencies.

1. In the event of unanticipated discovery of archaeological materials occurs during construction, the Water Agency shall retain the services of a qualified professional archaeologist to evaluate the significance of the items prior to resuming any activities that could impact the site. A qualified maritime archaeologist shall be retained to examine shipwreck remains or related submerged artifacts if discovered near the river mouth during outlet channel creation or maintenance.

2. In the case of an unanticipated archaeological discovery, if it is determined that the find is potentially eligible for listing in the California and/or National Registers, and the site cannot be avoided, the Water Agency shall provide a research design and excavation plan, prepared by a qualified archaeologist, outlining recovery of the resource, analysis, and reporting of the find. The research design and excavation plan shall be approved by the Water Agency, State Parks, and U.S. Army Corps of Engineers. The California State Lands Commission shall provide approval of a research design for shipwreck remains or related submerged artifacts. Implementation of the research design and excavation plan shall be conducted prior to work being resumed. Upon project approval, the Water Agency will coordinate with State Parks and U.S. Army Corps of Engineers to develop an action plan that can be implemented in the event that flooding is imminent and breaching must occur immediately.

Impact Significance after Mitigation: Less than Significant."

37. The text on page 4.8-14, of Section 4.8, Cultural Resources, has been revised as follows:

> **"Mitigation Measure 4.8.2:** The Water Agency will implement the following measures:
>
> > ***Discovery of Human Remains.*** If potential human remains are encountered, the contractor or Water Agency staff shall halt work in the vicinity of the find and contact the Sonoma County coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5…"

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38. The text on page 4.13-9, of Section 4.13, Public Services and Utilities and Public Safety, has been revised as follows:

> **"Impact 4.13.3: Public Safety. The Estuary Management Project could substantially affect public safety at the outlet channel location during channel creation. (Less than Significant with Mitigation)**
>
> During continued artificial breaching and outlet channel creation, the Water Agency will deploy and operate heavy machinery on the beach... After outlet channel establishment, construction vehicles will be removed and beach access will be restored. While public citizens are responsible for safe enjoyment of the beach, the Water Agency will implement **Mitigation Measure 4.13.~~1~~3**, which requires installation of signage at key locations to notify the public of potential safety hazards associated with beach erosion and hydrologic action at the outlet channel or artificial breaching location.
>
> ### *Mitigation Measures*
>
> > **Mitigation Measure 4.13.~~1~~3:** Following outlet channel creation or artificial breaching, the Water Agency will install semi-permanent signage notifying beach users of channel conditions..."

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39. The text on page 5-19, of Chapter 5.0, Cumulative Analysis, has been revised as follows:

> "The Russian River Biological Opinion addresses this problem by mandating the creation of pools, backwaters and side channels on six miles of the ~~15~~14-mile creek over a 12-year period."

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40. The text on page 5-32, of Chapter 5.0, Cumulative Analysis, has been revised as follows:

"Mitigation Measures

Mitigation Measures in **Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures**.

Impact Significance: Less than Significant with Mitigation."

APPENDIX 1

Distribution List

DISTRIBUTION LIST - DRAFT EIR

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
HARD COPY						
Martini-Lamb	Jessica	Sonoma County Water Agency	404 Aviation Blvd	Santa Rosa	CA	95403
Vitale	Paul	Resident	1530 Tuolumne St	Vallejo	CA	94590
	Reference Desk	Sonoma County Library, Central Library	3rd and E St.	Santa Rosa	CA	95404
	Reference Desk	Guerneville Regional Library	14107 Armstrong Woods Road	Guerneville	CA	95446
	Reference Desk	Occidental Library	73 Main Street	Occidental	CA	95465
COMPACT DISC (CD)						
Adelman	Brenda		PO Box 501	Guerneville	CA	95446
Ares	Carl	Resident	PO Box 46	Jenner	CA	95450
Armor	Charles	California Department of Fish and Game - Bay Delta Region, Habitat Conservation Unit	7330 Silverado Trail	Napa	CA	94559
Baker	Rick		127 Alderbrook	Santa Rosa	CA	95405
Bargsten	Stephen	Regional Water Quality Control Board-North Coast Region 1	5550 Skylane Blvd., Suite A	Santa Rosa	CA	95403
Beal	William	Resident	PO Box 514	Bodega Bay	CA	94923
Behrens	Dane	Bodega Marine Lab - UC Davis	408 A St	Davis	CA	95616
Bley	Wolf		PO Box 101	Jenner	CA	95450
Brennan	Matt	PWA	550 Kearny St ste 900	San Francisco	CA	94108
Butler	Dick	National Marine Fisheries Service	777 Sonoma Avenue, Room 325	Santa Rosa	CA	95404
Carranza	I.		PO Box 10	Jenner	CA	95450
Chestnut	Amy	Sonoma Land Trust	966 Sonoma Avenue	Santa Rosa	CA	95404
Chyle	John and Lena	Resident	PO Box 55	Jenner	CA	95450
Coates	Donald	North Coast Regional Water Quality Control Board	PO Box 1726	Bodega	CA	94323
Coates	Donald	North Coast Regional Water Quality Control Board	5550 Skylane Blvd, Ste. A	Santa Rosa	CA	95403
Cynthia L	Urbina		PO Box 11	Jenner	CA	95450
Dawson	Chris	Resident	838 First Street	Sebastopol	CA	95472
Desin	Mike	Resident	PO Box 49	Jenner	CA	95450
Donovan	JD	Resident	PO Box 22	Duncans Mills	CA	95430
Eilers	Mark	Resident	PO Box 1313	Bodega Bay	CA	94923
Ferguson	Hal	Resident	PO Box 16	Jenner	CA	95450
Fish	Mary and Larry	Resident	PO Box 99	Jenner	CA	95450
Fisher	Linda	Jenner Visitor Center	PO Box 1726	Villa Grande	CA	95486
Fitzgerald	Richard	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
Franklin	Reno	Cultural Resources Coordinator, Stewarts Point Rancheria	3535 Industrial Drive, Suite B-2	Santa Rosa	CA	95403
Frey	Taylor	Resident	7124 Julianna Street	Sebastopol	CA	95972

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COMPACT DISC (CD)						
Hakala	Ben		PO Box 48	Bodega Bay	CA	94922
Hales	Marty	Resident	1512 Willard Street	San Francisco	CA	94117
Hanson	Larry	Northern California Riverwatch	500 Main Street, Suite 110	Sebastopol	CA	95472
Hardy	Dian	Seal Watch	2102 Chianti Drive	Santa Rosa	CA	95401
Hearn	William	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
Hellerson	Craig	Resident	1545 Shaw Court	Bodega Bay	CA	94923
Hieb	Richard and Laura	Resident	PO Box 52	Jenner	CA	95459
Hines	Brian	Trout Unlimited - Redwood Chapter	PO Box 3237	Santa Rosa	CA	95402
Hultman	Debbie	California Department of Fish and Game - Bay Delta Region, Habitat Conservation Unit	7329 Silverado Trail	Napa	CA	94558
Jackson	David	Resident	1451 Keiser Avenue	Santa Rosa	CA	94503
Jellison	Norma		PO Box 1636	Bodega Bay	CA	94923
Keller	David	Friends of the Eel River	PO Box 2039	Sausalito	CA	94966
Kenly	David	Jenner Community Center	PO Box 158	Jenner	CA	95450
Largier	John	Bodega Marine Lab - UC Davis	408 A St	Davis	CA	95616
Larson	Eric	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
Lee	Ninette	California State Lands Commission	100 Howe Ave., Ste. 100-South	Sacramento	CA	95825
Luna	Michele	Stewards of the Coast and Redwoods	P.O. Box 2	Duncan Mills	CA	95430
Mack	Steve	Sweetwater Springs WD	PO Box 48	Guerneville	CA	95446
Mannion	Cherie and Dan	Resident	PO Box 274, 26500 Hwy 116	Duncans Mills	CA	95430
Martinez	Kristin	Jenner Headlands	15160 Rio Nido Road	Guerneville	CA	95446
Martinez	Jason	Wildlands Conservancy	39611 Oak Glen Rd., Bldg. 12	Oak Glen	CA	92399
Mazza	James	U.S. Army Corps of Engineers-Regulatory Division	1455 Market St. Floor 16	San Francisco	CA	94103
McEnhill	Don	Russian Riverkeeper	PO Box 1335	Healdsburg	CA	95448
McKannay	Adam	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
McKeon	John	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
Mortenson	Joe	Stewards of the Coast and Redwoods				
Mountain	Anthony	Resident	PO Box 114	Jenner	CA	95450
Murphy	Charles	Resident	22731 Sylvan Way	Monte Rio	CA	95463
Nilson	Spencer	Surfrider - Sonoma Coast Chapter	PO Box 2280	Sebastopol	CA	95473
O'Leary	Dennis	Resident	PO Box 251	Guerneville	CA	95446
O'Leary	Patty	RRWPC	PO Box 251	Guerneville	CA	95446
O'Neil	Brendan	CA Dept of Parks & Recreation-Russian River District	P.O. Box 123	Duncan Mills	CA	95430
Orr	Michelle	PWA	551 Kearny St ste 900	San Francisco	CA	94109

DISTRIBUTION LIST - DRAFT EIR (CONTINUED)

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COMPACT DISC (CD)						
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Rath	Linda	CA Dept of Parks and Recreation-Russian River District	P.O. Box 123	Duncan Mills	CA	95430
Reilly	Mike		11305 Velluntini Rd.	Forestville	CA	95436
Robb-Wilder	Sukey	Resident, SSWD Board	21892 West Street	Villa Grande	CA	95486
Rogers	Rick	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
Sanchez	Katy	National American Heritage Commission	915 Capitol Mall, Room 364	Sacramento	CA	95814
Sarris	Greg	c/o Nick Tipon, Sacred Sites Protection Committee Chairman, Federated Indians of Graton Rancheria	6400 Redwood Drive, Suite 300	Rohnert Park	CA	94928
Schumaker	David		PO Box 164	Duncans Mills	CA	95430
Slaton	Phil	Resident	PO Box 40	Duncans Mills	CA	95430
Smith	Geoff	Eco Ring	PO Box 27	Jenner	CA	95450
Sukovitzen	Darrell	Sonoma Coast Advisory	PO Box 849	Guerneville	CA	95446
Sund	Ken	Resident	411 Jensen Ln.	Windsor	CA	95492
Twohy	Elinor		PO Box 21	Jenner	CA	95450
Vellutini	Carol		610 Willrush Street	Santa Rosa	CA	95401
West	Jordan	Resident	1544 Shaw Court	Bodega Bay	CA	94922
Wikle	Ken and Victoria	Russian River Redevelopment OC	PO Box 151	Villa Grande	CA	95486
		State Clearinghouse	1400 Tenth Street	Sacramento	CA	98514
Higgins	Caroline	Sonoma Coast Chapter of Surfrider	PO Box 2280	Sebastopol	CA	95473

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Anya Perran-Burdick	aburdick@crpinc.org	Janeann Erickson	erickson@ap.net	Rick Baker	rickbaker@sonic.net
Barbara Yoder	barbara.yoder@comcast.net	Jason Martinez	jason.m@twc-ca.org	Rick Rogers	rick.rogers@noaa.gov
Bill Andersen	hbgandy@comcast.net	John Chyle	jchyle@sonic.net; lchyle@sonic.net	Ruby Pap	rpap@coastal.ca.gov
Brendan O'Neil	boneil@parks.ca.gov	John McKeon	John.McKeon@noaa.gov	Rue Furch	rue@ruefurch.com
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Hal Ferguson	hal_ferguson78@pobox.com	Paula Whealen	pjwhealen@wagner-engrs.com		srf@northcoast.com

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 1

CONTACT (FIRST AND LAST NAME)	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Perry Crowley	U S Army Corps of Engineers-Park Manager	3333 Skaggs Springs Road	Geyserville	CA	95441-9644
Ann Maurice	Ad Hoc Committee	PO Box 484	Occidental	CA	95465
Darryl Young, Director	CA Department of Conservation	801 K Street, 24th Floor	Sacramento	CA	95814
Neil Manji	CA Dept of Fish & Game-Native Anadromous Fish & Watershed Restoration Branch	830 S Street	Sacramento	CA	95811
Dave Schaub	CA Dept of Parks & Recreation-Natural Resources	PO Box 942896	Sacramento	CA	94296
Brendan O'Neil	CA Dept of Parks & Recreation-Russian River District	P.O. Box 123	Duncan Mills	CA	95430-0123
Linda Rath	CA Dept of Parks and Recreation-Russian River District	P.O. Box 123	Duncan Mills	CA	95430-0123
Eric Larson	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
Richard Fitzgerald	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
Adam McCannay	CA Dept. of Fish and Game	P.O. Box 47	Yountville	CA	94599
Chuck Armor	CA Dept. of Fish and Game-Bay Delta Region	7329 Silverado Trail	Napa	CA	94558
	CA Dept. of Fish and Game-Habitat Conservation Planning Branch	1416 Ninth Street, 12th Floor	Sacramento	CA	95814
	CA State Clearinghouse-Governor's Office of Planning & Research	PO Box 3044	Sacramento	CA	95812-3044
Ruby Pap	California Coastal Commission-North Central Coast District	45 Fremont Street, Suite 2000	San Francisco	CA	94105-2219
Grace Ma	California Coastal Commission-North Central Coast District	45 Fremont Street, Suite 2000	San Francisco	CA	94105-2219
Dan Carl	California Coastal Commission-North Central Coast District	45 Fremont Street, Suite 2000	San Francisco	CA	94105-2219
	California Department of Transportation-District 4	PO Box 23660	Oakland	CA	94623-0660
	California Resources Agency	1416 Ninth Street, Suite 1311	Sacramento	CA	95814
Ninette Lee	California State Lands Commission	100 Howe Ave., Ste. 100-South	Sacramento	CA	95825-8202
Anya Perran-Burdick	Circuit Rider Productions	9619 Old Redwood Hwy	Windsor	CA	95492
	Coastal Conservancy-North Coast Region	1330 Broadway, 13th Floor	Oakland	CA	94612-2530
Don Wallace	Dry Creek Vineyard	PO Box T	Healdsburg	CA	95448
David Keller	Friends of the Eel River	PO Box 2039	Sausalito	CA	94966
Jeff Lyon	Gallo Family Vineyard	3387 Dry Creek Rd	Healdsburg	CA	95448
Reference Desk	Guerneville Regional Library	14107 Armstrong Woods Road	Guerneville	CA	95446
David Kenly	Jenner Citizen's Advisory Committee	P.O. Box 158	Jenner	CA	95450
Harvey and Sharon Mendelson	Jenner Community Center	P.O. Box 456	Monterio	CA	95462
Janeann Erickson	Madrone Audubon Soociety	PO Box 1911	Santa Rosa	CA	95402
Linda McClure, Co-Director	Mendocino Environmental Center	P.O. Box 299	Ukiah	CA	95482-0299

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 1

CONTACT (FIRST AND LAST NAME)	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
William Hearn	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
John McKeon	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
Rick Rogers	National Marine Fisheries Service	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
Charlotte Ambrose	National Marine Fisheries Service, North-Central California Coast	777 Sonoma Avenue, Suite 325	Santa Rosa	CA	97494
David Woodbury	NOAA Fisheries	807 Corona Road	Petaluma	CA	94954
Barbara Lee	Northern Sonoma County Air Pollution Control District	150 Matheson Street	Healdsburg	CA	95448
Reference Desk	Occidental Library	73 Main Street	Occidental	CA	95465
Evelyn Williams	Postmaster	P.O. Box 262	Duncan Mills	CA	95430
Matt Brennan	PWA	550 Kearny St ste 900	San Francisco	CA	94108
Kent Macintosh	Redwood Empire Trout Unlimited	PO Box 3237	Santa Rosa	CA	95402-3237
Stephen Bargsten	Regional Water Quality Control Board-North Coast Region 1	5550 Skylane Blvd., Suite A	Santa Rosa	CA	95403
Bill Ricioli	Ricioli	P.O. Box 168	Jenner	CA	95450
Rick Baker	RRFF/TU	127 Alderbrook	Santa Rosa	CA	95405
Steve Tubbs	Russian River Fly Fishers	511 I St	Petaluma	CA	94952
Ed Barich	Russian River Fly Fishers	5499 Newanga Ave	Santa Rosa	CA	95405
Rebecca Cress	Russian River Unlimited	PO Box 1426	Ukiah	CA	95482
Linda Curry	Russian River Watershed Council	PO Box 3908	Santa Rosa	CA	95402
Zeno Swijtink	Russian River Watershed Council	128 Nelson Way	Sebastopol	CA	95472
Brenda Adelman	Russian River Watershed Protection Committee	P.O. Box 501	Guerneville	CA	95446
Don McEnhill	Russian Riverkeeper	PO Box 1335	Healdsburg	CA	95448
	Salmon Protection and Watershed Network	PO Box 400	Forest Knolls	CA	94933
	Salmonid Restoration Federation	PO Box 784	Redway	CA	95560
Sarg T	SCWA	P.O. Box 285	Cazadero	CA	95421
Chris Harding	SCWA	292035A Hwy 116	Jenner	CA	95450
Dian Hardy	Sealwatch	1711 Darby Rd	Sebastopol	CA	95472
Larry Laba	SOAR	20 Healdsburg Ave	Healdsburg	CA	95448
Efren Carrillo, Supervisor District 5	Sonoma County Board of Supervisors	575 Administration Drive, Room 100A	Santa Rosa	CA	95403
Recorder's Office	Sonoma County Clerk	2300 County Center Drive, Suite B177	Santa Rosa	CA	95403
	Sonoma County Conservation Center	P.O. Box 4346	Santa Rosa	CA	95402
Jennifer Barrett	Sonoma County Permit & Resource Mgmt Dept	2550 Ventura Avenue	Santa Rosa	CA	95403
Mary Burns	Sonoma County Regional Parks	2300 County Center Drive, Suite 120A	Santa Rosa	CA	95403
	Sonoma County Transportation and Public Works	2301 County Center Drive, Suite B100	Santa Rosa	CA	95404
Sierra Cantor	Sotoyome RCD	P.O. Box 1156, SR-03	Santa Rosa	CA	95403

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 1

CONTACT (FIRST AND LAST NAME)	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Diana Jacobs, Senior Ecologist	State Lands Commission	100 Howe Avenue, #100	Sacramento	CA	95825
Susan Stratton, Project Unit Review Supervisor	State Office of Historic Preservation-Dept. of Parks and Recreation	PO Box 942898	Sacramento	CA	94296-0001
Gary Wolfee, P.E, PhD, Vice Chair	State Water Resources Control Board	PO Box 100	Sacramento	CA	95812
Michele Luna	Stewards of the Coast & Redwoods	P.O. Box 2	Duncan Mills	CA	95430
Keaoy Sorenson	Stewards of the Coast & Redwoods	10017 Cherryridge	Sebastopol	CA	95472
Vira Burgerman	The California Mermaid	P.O. Box 1733	Guerneville	CA	95446
Mike Orton	Trout Unlimited	324 Walnut St	Petaluma	CA	94952
Laura Monarres, North Branch Chief	U S Army Corps of Engineers-Regulatory Division	1455 Market St. Floor 16	San Francisco	CA	94103-1368
Alexis Strauss	U S Environmental Protection Agency- Water Division	75 Hawthorne Street	San Francisco	CA	94105
Harry Sarydarian	U S Environmental Protection Agency-Region 9	75 Hawthorne Street	San Francisco	CA	94105
Jim Browning	U S Fish & Wildlife Service-Sacto Field Ofc, Endangered Species Div	2800 Cottage Way #W-2605	Sacramento	CA	95825-1846
Pat Shiffer	U S Geological Survey-Water Resources Division	6000 J Street Placer Hall	Sacramento	CA	95819
James Mazza	U.S. Army Corps of Engineers-Regulatory Division	1455 Market St. Floor 16	San Francisco	CA	94103-1368
Dane Behrens	UC Davis	408 A St	Davis	CA	95616
Randy Brown	US Fish and Wildlife Service	1655 Heidon Road	Arcarta	CA	95521-4573
State Resources Conservationist	USDA NRCS	430 G Street	Davis	CA	95616-4164
Bill Andersen	WBG Wild Steelhead Festival	701 S. Fitch Mountain Rd	Healdsburg	CA	95448
Norma Jellison		P.O. Box 1636	Bodega Bay	CA	94923
Scott VanCleemput		PO Box 413	Valley Ford	CA	94972
Paula Whealen		444 N. 3rd #325	San Jose	CA	95111
Ryan Stolfus		444 N. 3rd #325	San Jose	CA	95111
Beth Hearn		18 Springhill Dr	Cazadero	CA	95421
Carol Sklenicka		P.O. Box 132	Duncan Mills	CA	95430
Steve Jackson		16258 Main St	Guerneville	CA	95446
Carol Farnes		P.O. Box 458	Guerneville	CA	95446
Chris Arf		P.O. Box 1064	Guerneville	CA	95446
Justin Wilson		1421 W. Dry Creek Rd	Healdsburg	CA	95448
Richard Maddock		4970 W. Soda Rock Ln	Healdsburg	CA	95448
Marci Cook		15375 Pozzan	Healdsburg	CA	95448
John Saini		PO Box 1822	Healdsburg	CA	95448
Nathan Baskett		2054 Madrone Ave	Healdsburg	CA	95448
Richard Mounts		5545 W. Dry Creek Rd	Healdsburg	CA	95448
Buz Rowell		P.O. Box 100	Jenner	CA	95450

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CONTACT (FIRST AND LAST NAME)	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Cheryl Maynard		11056 Burke	Jenner	CA	95450
Bud Veliquette		P.O. Box 155	Jenner	CA	95450
Kathie Lowry		P.O. Box 13	Jenner	CA	95450
Donald Martin		P.O. Box 155	Jenner	CA	95450
Darrell Sukovitz		PO Box 171	Jenner	CA	95450
Frances Werner		PO Box 370	Monterio	CA	95462
Rue Furch		P.O. Box 1853	Sebastopol	CA	95473
Ken & Maria Sund		411 Jensen Ln.	Windsor	CA	95492
Christina & Michael Keller		8645 Alden Ln	Windsor	CA	95492
William Roberts		PO Box 15	Sebastopol	CA	95973

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
		Forestville Chamber of Commerce President	P O Box 546	Forestville	CA	95436
		Gold Ridge Resource Conservation District	P O Box 1064	Occidental	CA	95465
		Hacienda Water Company	16654 Watson Road	Guerneville	CA	95446
		Miske D.C.	16775 Center Way	Guerneville	CA	95446
		Occidental Chamber of Commerce Director	P O Box 159	Occidental	CA	95465
		Pesavento Appraisals	P O Box 740	Monte Rio	CA	95462
		Russian River Sportsman's Club	P O Box 7	Duncans Mills	CA	95430
Mary	Agneberg		P O Box 744	Guerneville	CA	95446
Fred	Albrecht	Clean Water Network	6947 Cliff Avenue	Bodega Bay	CA	94923
Ron	Amiot		16056 Riverlands	Guerneville	CA	95446
David	Andres	Sweetwater Springs Water District General Manager	P O Box 48	Guerneville	CA	95446-0048
Cal and Cher	Ares		PO Box 46	Jenner	CA	95450-0090
	Arjuna		14636 Cherry Street	Guerneville	CA	95446
Henry C	Baker Sr	Druids of Occidental	P O Box 33	Camp Meeker	CA	95419
Diane	Barth		19491 Redwood Drive	Monte Rio	CA	95462
Susan	Bartholome		9345 Champs D'Elysees	Forestville	CA	95436
David	Berman		P O Box 1152	Occidental	CA	95465
Gary	Bodwin		8180 Park Avenue	Forestville	CA	95436
Mathew	Bouber		14630 Eastern Ave	Guerneville	CA	95446
Judy	Boyce	Russian River Chamber of Commerce Executive Director	PO Box 331	Guerneville	CA	95436
C R (Bob)	Briscoe, P.E. MASCE	State of California Parks and Recreation Department-RR/ Mendocino District	25381 Steelhead Blvd	Duncan Mills	CA	95430
Kyla	Brooke		PO Box 39	Villa Grande	CA	95486
Royce	Brooks		9097 Gilroy Avenue	Guerneville	CA	95446
Valerie	Brown	Sonoma County Board of Supervisors 1st District, Chair	575 Administration Dr, Rm 100A	Santa Rosa	CA	95407
Kimberly	Burr	NCEDC	P O Box 1246	Forestville	CA	95436
Frank & Marylee	Carli		PO Box 327	Guerneville	CA	95446
Ernie	Carpenter	Russian River Chamber of Commerce	P O Box 331	Guerneville	CA	95446
Steve & Nicole	Chechowich		PO Box 1882	Guerneville	CA	95446
Stephanie	Cika		11659 Saratoga	Guerneville	CA	95446
Robert and Spiro	Clemens		P O Box 595	Forestville	CA	95436
Brandon	Coen		16641 Center Way	Guerneville	CA	95446
Samuel	Coon		P O Box 345	Guerneville	CA	95446

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Vesta	Copestakes		6490 Front Street #30D	Forestville	CA	95436
Lynn	Crescione	Russian River Alliance	P O Box 2185	Guerneville	CA	95446
Al and Paula	Damelio		13097 Riverside Drive	Guerneville	CA	95446
John	Davidson		P O Box 1502	Guerneville	CA	95446
Darcy and Terry	Devlin		10554 Colfax Avenue	Guerneville	CA	95446
Scott	Doughty	Doughty's	P O Box 44	Occidental	CA	95465
Russell E.	Downs	Russian River Chamber of Commerce	20750 Front Street	Monte Rio	CA	95462
Robbi	Ernst		19375 Pine Glade	Gurneville	CA	95446
Dan	Fein		PO Box 525	Monte Rio	CA	95462
Heidi	Franceschi		P O Box 926	Guerneville	CA	95446
Tammie	Fraser		PO Box 338	Rio Nido	CA	95471
Bill	Freitas	Korbel & Bros Inc	13250 River Road	Guerneville	CA	95446
Jim	Friedman		16747 Armstrong Woods Road	Guerneville	CA	95446
Jim	Gaffney		16251 Main Street	Guerneville	CA	95446
Wayne D.	Gibb		8690 Trenton Road	Forestville	CA	95436
Janice	Gilligan		8843 Marianna Drive	Forestville	CA	95436-9267
Kevin	Gilman		P O Box 48	Guerneville	CA	95446
Phillip	Gitchell		1065a Pacific Ave	Jenner	CA	95950
Spencer	Grange		11100 Summer Home Park Road	Forestville	CA	95436
Joel	Hack	Bodega Bay Navigator, Editor	P O Box 969	Bodega Bay	CA	94923
Cindy	Hall	Russian River County Water District	P O Box 954	Forestville	CA	95436
Philip	Hampton	Monte Rio Chamber of Commerce	P O Box 220	Monte Rio	CA	95462
Larry	Hanson		10448 Scenic Drive	Forestville	CA	95436
Rick	Harrington		14151 Woodland Dr	Guerneville	CA	95446-9592
Clare	Harris		13375 Guerne Way	Guerneville	CA	95446
Herman J	Hernandez	RRFF	PO Box 105	Guerneville	CA	95446
David	Herr		10692 River Drive	Forestville	CA	95436
Gay	Hogan		P O Box 2083	Guerneville	CA	95446
Roberta	Hollin	Ya-Ka-Ama Educational Center	6215 Eastside Road	Forestville	CA	95436
Megan	Hope		PO Box 1662	Guerneville	CA	95446
Gretchen	Hughes	Camp Meeker Recreation & Park District, Bookkeeper	PO Box 461	Camp Meeker	CA	95419
Bonnie	Johnson		16790 Guernewood Lane	Guerneville	CA	96556
Susan	Joice		17330 Neelay Road	Guerneville	CA	95446
Pat	Kahcie		16056 Riverlands	Guerneville	CA	95446

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
E. Wallie	Kass	Riverlane Resort	PO Box 313	Guerneville	CA	95446
Rick and Lorraine	Kelly		14160 Woodland Drive	Guerneville	CA	95446
Margaret	Kennett	Russian River Chamber of Commerce President	16650 Highway 116	Guerneville	CA	95436
David	Kenny		PO Box 158	Jenner	CA	95450
Michael	Kerns	Sonoma County Board of Supervisors 2nd District, Supervisor	576 Administration Dr, Rm 100A	Santa Rosa	CA	95410
Vera	Khlopoff		17456 Orchard Avenue	Guerneville	CA	95446
Bob	Knight		7352 Harmon Avenue	Guerneville	CA	95446
Ted Schroeder	Linda Burke	Burke's Russian River Canoe Trips	PO Box 602	Forestville	CA	95436
Herwig	Loose		21050 River Boulevard	Monte Rio	CA	95462
Jon	Lucca		P O Box 2743	Guerneville	CA	95446
Tom	Lynch		PO Box 1452	Guerneville	CA	95446
Johanna	Lynch	Russian River Times	P O Box 573	Monte Rio	CA	95462
Lana	Mac		15590 Fern Way	Guerneville	CA	95446
Bruce A	MacDoneu		PO Box 304	Guerneville	CA	95446
Steve	Mack	Sweetwater Springs Water District	PO Box 48	Guerneville	CA	95446-0048
Jim	Marasca	Russian River Chamber of Commerce	PO Box 331	Guerneville	CA	95436
Laurel	Marcus		P O Box 158	Rio Nido	CA	95471
Susan	Markell		P O Box 174	Rio Nido	CA	95471
Virginia S	Martin		P O Box 125	Duncan Mills	CA	95430
Judie	Mathia		13459 Recreation Drive	Guerneville	CA	95446
Richard J.	Mc Gowan	Trout Unlimited	11447 Terrace Drive	Forestville	CA	95436
Maggie	McDonald		PO Box 1911	Guerneville	CA	95446
Lynette	McLean		P O Box 346	Guerneville	CA	95446
Sondra	McSkimming		15320 Rio Nido	Guerneville	CA	95446
Jan	Meiswinkel		17605 Neely Road	Guerneville	CA	95446
Zelda	Michaels		P O Box 606	Monte Rio	CA	95446
Richard	Miller	Harmony Environmental Services	10749 Woodside Drive, #2	Forestivlle	CA	95436
	Mr. & Mrs. Alverez	Property Owner	355 Gambier St	San Francisco	CA	94134-1341
	Mr. & Mrs. Angella	Property Owner	1022 Dyer Dr	Lafayette	CA	94549-4653
	Mr. & Mrs. Barr	Property Owner	9474 Westside Rd	Forestville	CA	95436-9501
	Mr. & Mrs. Beil	Property Owner	1936 University Ave #b	Berkeley	CA	94704-1054
	Mr. & Mrs. Blin	Property Owner	447 Anita Dr	Millbrae	CA	94030-1602
	Mr. & Mrs. Conkie	Property Owner	5020 Agate Ct	Pollock Pines	CA	95726-9309
	Mr. & Mrs. Cook	Property Owner	12175 Oak Shade Ct	Grass Valley	CA	95949-9572

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
	Mr. & Mrs. Epstein	Property Owner	3612 Holly Ridge Dr	Santa Rosa	CA	95409-4010
	Mr. & Mrs. Furia	Property Owner	8205 Jay Bird Way	Windsor	CA	95492-8076
	Mr. & Mrs. Gannon	Property Owner	9610 Rio Vista Rd	Forestville	CA	95436-9391
	Mr. & Mrs. Goldberg	Property Owner	1655 Juliet Dr	Petaluma	CA	94954-4580
	Mr. & Mrs. Hahn	Property Owner	100 Bache St	San Francisco	CA	94110-5947
	Mr. & Mrs. Hardeman	Property Owner	11955 Westside Rd	Forestville	CA	95436-9809
	Mr. & Mrs. Hill	Property Owner	9475 Westside Rd	Forestville	CA	95436-9501
	Mr. & Mrs. Hoover	Property Owner	PO Box 672	Forestville	CA	95436-0672
	Mr. & Mrs. Howard	Property Owner	9484 Westside Rd	Forestville	CA	95436-9501
	Mr. & Mrs. Jimenez	Property Owner	PO Box 1544	Forestville	CA	95436-1544
	Mr. & Mrs. Knight	Property Owner	9442 Oak Ln	Forestville	CA	95436-9509
	Mr. & Mrs. Lillis	Property Owner	144 Corona St	San Francisco	CA	94127-2808
	Mr. & Mrs. Loewenthal	Property Owner	PO Box 503	Captain Cook	HI	96704-0503
	Mr. & Mrs. Lundahl	Property Owner	9491 Champs De Elysees	Forestville	CA	95436-9388
	Mr. & Mrs. Nakamura	Property Owner	12300 Westside Rd	Forestville	CA	95436-9732
	Mr. & Mrs. Neves	Property Owner	3245 Hwy 160 S	Cortez	CO	81321
	Mr. & Mrs. Poluektov	Property Owner	9455 Westside Rd	Forestville	CA	95436-9501
	Mr. & Mrs. Ragle	Property Owner	322 Elbridge Ave	Cloverdale	CA	95425-4432
	Mr. & Mrs. Resuello	Property Owner	102 Dennis Dr #A	Daly City	CA	94015-2812
	Mr. & Mrs. Reyerson	Property Owner	PO Box 491	Forestville	CA	95436-0491
	Mr. & Mrs. Reynolds	Property Owner	11895 Westside Rd	Forestville	CA	95436-9808
	Mr. & Mrs. Starelli	Property Owner	34 Stoneyford Ave	San Francisco	CA	94112-1651
	Mr. & Mrs. Torchia	Property Owner	36042 Cripps Pl	Fremont	CA	94536-4632
	Mr. & Mrs. Tseng	Property Owner	3 Banff Dr	Princeton Junction	NJ	08550-5221
	Mr. & Mrs. Ware	Property Owner	8990 Westside Rd	Forestville	CA	95436-9501
	Mr. & Mrs. Zavala	Property Owner	536 Pomona Ave	Albany	CA	94706-1427
	Mr. and Mrs. Thye	Property Owner	85 Beaumont Ave	San Francisco	CA	94118-3301
	Mr. Berger	Property Owner	9481 Westside Rd	Forestville	CA	95436-9501
	Mr. Caples	Property Owner	12421 Westside Rd	Forestville	CA	95436-9807
	Mr. Chapman	Property Owner	9402 Westside Rd	Forestville	CA	95436-9501
	Mr. Dagnino	Property Owner	9480 Rio Vista Rd	Forestville	CA	95436-9508
	Mr. Dalley	Property Owner	PO Box 96	Forestville	CA	95436-0096
	Mr. Damico	Property Owner	2798 Lena Dr	San Jose	CA	95124-1930
	Mr. De Funiak	Property Owner	6701 Tannahill Dr	San Jose	CA	95120-5406
	Mr. De Lemos	Property Owner	PO Box 2251	Berkeley	CA	94702-0251

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
	Mr. Di Nardo	Property Owner	10940 Oak Ave	Forestville	CA	95436-9734
	Mr. Elychova	Property Owner	3 Cove Road Pl	Belvedere	CA	94920-2389
	Mr. Epstein	Property Owner	11110 Mcpeak Rd	Forestville	CA	95436-9741
	Mr. Evangelisti	Property Owner	9502 Westside Rd	Forestville	CA	95436-9732
	Mr. Granahan	Property Owner	13245 Hwy 116	Guerneville	CA	95446-9483
	Mr. Graves	Property Owner	1481 King St	Santa Rosa	CA	95404-3405
	Mr. Hallstan	Property Owner	325 Benton St	Santa Rosa	CA	95401-4834
	Mr. Kainlauri	Property Owner	3040 Market St	San Francisco	CA	94114-1825
	Mr. Kellogg	Property Owner	150 S 2nd St	Dixon	CA	95620-3502
	Mr. Lipman	Property Owner	760 Larchmont Dr	Daly City	CA	94015-3638
	Mr. Lockwood	Property Owner	883 Carina Ln	Foster City	CA	94404-2866
	Mr. Madden	Property Owner	112 Windsor Dr	San Carlos	CA	94070-2838
	Mr. Mayta	Property Owner	975 Capitol Ave	San Francisco	CA	94112-2209
	Mr. Mclarty	Property Owner	10825 Westside Rd	Forestville	CA	95436-9810
	Mr. Nichols	Property Owner	301 Melrose St	Modesto	CA	95354-0642
	Mr. Nikitas	Property Owner	12368 Westside Rd	Forestville	CA	95436-9732
	Mr. Oak	Property Owner	PO Box 2954	Sausalito	CA	94966-2954
	Mr. Parker	Property Owner	9410 Westside Rd	Forestville	CA	95436-9501
	Mr. Peller	Property Owner	9941 Westside Rd	Forestville	CA	95436-9796
	Mr. Perkins	Property Owner	3226 26th St	San Francisco	CA	94110-4638
	Mr. Poulsen	Property Owner	PO Box 2	Santa Rosa	CA	95402-0002
	Mr. Roe	Property Owner	9412 Westside Rd	Forestville	CA	95436-9501
	Mr. Roetzer	Property Owner	9994 Westside Rd	Forestville	CA	95436-9805
	Mr. Rykoff	Property Owner	PO Box 1703	Estacada	OR	97023-1703
	Mr. Scholten	Property Owner	134 Arlington St	San Francisco	CA	94131-2702
	Mr. Small	Property Owner	344 Pleasant Hill Ave N	Sebastopol	CA	95472-3107
	Mr. Smith	Property Owner	9411 Westside Rd	Forestville	CA	95482-9501
	Mr. Sorrells	Property Owner	PO Box 1946	Guerneville	CA	95446-1946
	Mr. Stone	Property Owner	4757 Lincoln Ave	Oakland	CA	94602-2534
	Mr. Syversen	Property Owner	9482 Westside Rd	Forestville	CA	95436-9501
	Mr. Thompson	Property Owner	PO Box 298	Forestville	CA	95436-0298
	Mr. Tran	Property Owner	1751 E 20th St	Oakland	CA	94606-4033
	Mr. Trivunovic	Property Owner	1055 W College Ave	Santa Rosa	CA	95401-5059
	Mr. Vila	Property Owner	590 S 33rd St	Richmond	CA	94804-4108
	Mr. Wallace	Property Owner	PO Box 1046	Forestville	CA	95436-1046

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
	Mr. Young	Property Owner	PO Box 248	Forestville	CA	95436-0248
	Ms. Baxter	Property Owner	12300 Skaggs Springs Rd	Geyserville	CA	95441-9642
	Ms. Biaggi	Property Owner	9604 Rio Vista Rd	Forestville	CA	95436-9391
	Ms. Blake	Property Owner	323 Lincoln Ave	Cotati	CA	94931-4485
	Ms. Desantos	Property Owner	1181 Cunningham Rd	Sebastopol	CA	95472-5528
	Ms. Dillon	Property Owner	1745 Lake St	San Mateo	CA	94403-1022
	Ms. Doherty	Property Owner	9494 Valley View Dr	Ukiah	CA	95482-9388
	Ms. Ershov	Property Owner	1236 16th Ave	San Francisco	CA	94122-2010
	Ms. Hurst	Property Owner	6325 Lone Pine Rd	Sebastopol	CA	95472-5620
	Ms. Illies	Property Owner	15003 Rockpile Rd	Geyserville	CA	95441-9695
	Ms. Johnsen	Property Owner	PO Box 414	Forestville	CA	95436-0414
	Ms. Lance	Property Owner	9478 Westside Rd	Forestville	CA	95436-9501
	Ms. Lee	Property Owner	9586 Rio Vista Rd	Forestville	CA	95436-9506
	Ms. Meier	Property Owner	PO Box 452	Forestville	CA	95436-0452
	Ms. Mellar	Property Owner	2401 Maple Ave	Concord	CA	94520-1806
	Ms. Mortensen	Property Owner	9421 Old River Rd	Forestville	CA	95436-9505
	Ms. Rogers	Property Owner	9514 Rio Vista Rd	Forestville	CA	95436-9506
	Ms. Sharp	Property Owner	8404 Lola Ave	Stanton	CA	90680-1713
	Ms. Shelton	Property Owner	PO Box 1298	Forestville	CA	95436-1298
	Ms. Smart	Property Owner	9550 Rio Vista Rd	Forestville	CA	95436-9506
	Ms. Spence	Property Owner	9490 Rio Vista Rd	Forestville	CA	95436-9508
	Ms. Wells	Property Owner	532 Mallory Ave	Windsor	CA	95492-8884
	Ms. Yentes	Property Owner	9449 Dell Rd	Forestville	CA	95436-9502
Bob	Murphy		P O Box 831	Forestville	CA	957436
Dr. Thomas	Murphy	Forestville Chiropractic	P O Box 1518	Forestville	CA	95436
Lynn	Newton		P O Box 1039	Forestville	CA	95436
Tom	Nichires		19395 Redwood Dr	Monte Rio	CA	95462
Dan	Northern	Forestville Fire Protection District Fire Chief	P O Box 427	Forestville	CA	95436
Patti	O'Keefe		14286 Sunset Avenue	Guerneville	CA	95446
Marcy	Orosco	Veterans Village Board Member	15210 Drake Road	Guerneville	CA	95446
Lois	Perlman	Russian River Monthly	14290 Sunset Avenue	Guerneville	CA	95446
Don	Peterson	Gold Ridge Resource Conservation District President	PO Box 1064	Occidental	CA	95465
Pete	Peterson	Sweetwater Springs Water District	P O Box 48	Guerneville	CA	95446-0048
Bob	Pierce	Monte Rio Rec & Park District, Bookkeeper	P O Box 877	Monte Rio	CA	95462

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Mike and Faye	Poveda		13477 Recreation Drive	Guerneville	CA	95446
Joe	Pozzi	Gold Ridge Resource Conservation District	PO Box 1064	Occidental	CA	95465
	Property Owner		PO Box 2301	Buffalo	NY	14240
	Property Owner		2555 Mendocino Ave	Santa Rosa	CA	95403
	Property Owner		15332 Antioch St #134	Pacific Palisades	CA	90272-3628
	Property Owner		80 Richland Ave #a	San Francisco	CA	94110-5838
	Property Owner		10295 Westside Rd	Healdsburg	CA	95448-8346
Sam	Pullaro	Guerneville School District	14630 Armstrong Woods Road	Guerneville	CA	95446
Dave	Roberts		PO Box 2418	Guerneville	CA	95446
George	Roberts	Forestville Water District General Manager	PO Box 261	Forestville	CA	95436-0261
Jack	Robinson		14969 Cherry Street	Guerneville	CA	95446
Laurie	Ross		8234 Spring Drive	Forestville	CA	95436
William and Dottie	Ruppert		16024 Fife Court	Guerneville	CA	95446
Rose	Saint John		19380 Pine Glade	Guerneville	CA	95446
Connie	Schlabach		17654 Natoma Drive	Guerneville	CA	95446
Pat	Schuch		P O Box 484	Forestville	CA	95436
Wanda	Smith	SCWD	PO Box 2667	Guerneville	CA	95446
Barbara	St Louis		7352 Harmon Avenue	Guerneville	CA	95446
Ellen	Strady	Prudential Ca Realty	16315 Main Street	Guerneville	CA	95446
Lloyd and Cynthia	Strecker	Downriver Institute-Citizens for Local Control	P O Box 293	Monte Rio	CA	95462
Cheryl and John	Sunberg		14020 Woodland Drive	Guerneville	CA	95446
Elaine	Sundberg		P O Box 152	Guerneville	CA	95446
Dick and Jan	Swanson		PO Box 670	Bodega Bay	CA	94923
Joan	Szerszen		14286 Sunset Avenue	Guerneville	CA	95446
Philip	Tanarkin		P O Box 278	Forestville	CA	95436
Kristin	Thurman		P O Box 525	Monte Rio	CA	95462
Lee O.	Torr III	Monte Rio Fire Protection District	PO Box 218	Monte Rio	CA	95462
Jim	Trancitina		7390 Hidden Lake Road	Forestville	CA	95436
Jim & Connie	Tuck	Tuck & Associates	13361 Colfax Ave	Guerneville	CA	95446
Rick	Van Bruggen		P O Box 19	Guerveville	CA	95446
Marsha	Vergano		17705 Orchard Avenue	Guerneville	CA	95446
Sally	von Kousky		P O Box 576	Monte Rio	CA	95462
Bill	Wadsworth		3660 Church	Occidental	CA	95465
Deborah	Waller		17410 Guernewood Lane	Guerneville	CA	95446
Leslie	Warren		P O Box 335	Monte Rio	CA	95462

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARTION – LIST 2

FIRST NAME	LAST NAME	ORGANIZATION	STREET	CITY	STATE	ZIP CODE
Bev	Wasson	Alexander Valley Association	P O Box 158	Rio Nido	CA	95471
Suki	Waters		PO Box 53	Jenner	CA	95450
Nick	Wheeler		22942 Conifer Dr	Monte Rio	CA	95462
Ken and Victoria	Wilke	Russian River Redevelopment OC	PO Box 151	Villa Grande	CA	95486
Laura	Wilson		PO Box 386	Guerneville	CA	95446
Hal	Wood	Russian River Utility, President	PO Box 730	Forestville	CA	95436-0730
Joyce and Bill	Young		16589 Glenda	Guerneville	CA	95446
Shirlee	Zane	Sonoma County Board of Supervisors 3rd District	577 Administration Dr, Rm 100A	Santa Rosa	CA	95406
George	Zastro	Sequoia Paddling Club	PO Box 1041	Guerneville	CA	95446
George	Zastrow		16833 Center Way	Guerneville	CA	95446
Dana	Zimmerman	Russian River Rec & Park	16900 Neeley Road	Guerneville	CA	95446

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARATION – LIST 3

FIRST NAME	LAST NAME	MAILING ADDRESS	CITY, STATE, ZIP CODE
Richard M	Adams	750 Edgewood Ave	Mill Valley Ca 94941
Lp	Ajo	1161 Robertson Way	Sacramento Ca 95818
Arthur Edward Michael & Anglin Sus	Anglin	2842 Ashby Ave	Berkeley Ca 94705
Bruce Tr	Bacchi	15700 N Hoerl Rd	Lodi Ca 95240
John R & Patricia A	Barry	PO Box 57	Jenner Ca 95450
Dennis R Tr & Mary A Tr	Binstock	5131 Coombsville Rd	Napa Ca 94558
Wolfgang R Tr	Bley	9550 Goat Rock Rd	Jenner Ca 95450
Christian P & Ann K Tr	Boddum	6051 Monroe Ave	Oakland Ca 94618
Tracy L	Butcher	PO Box 949	Guerneville Ca 95446
Loretta Tr Et Al	Cabrera	PO Box 221849	Sacramento Ca 95822
Kevin J	Campbell	PO Box 20	Jenner Ca 95450
Timothy N Tr Et Al	Canelis	600 Austin Creek Rd	Cazadero Ca 95421
Georgina D Tr Et Al	Casini	PO Box 133	Duncans Mills Ca 95430
John J & Lena Warness Tr	Chyle	PO Box 55	Jenner Ca 95450
Willis L Jr Tr & Nancy J Tr	Clarke	8210 Country Lake Dr	Orangevale Ca 95662
Rene G Tr	Coombes	Rr 4 Box 2293	Pahoa Hi 96778
Kim Et Al	Corwin	PO Box 1855	Laytonville Ca 95454
	County Of Sonoma	2555 Mendocino Ave	Santa Rosa Ca 95403
David Tr Et Al	Culler	1314 Hopkins St	Berkeley Ca 94702
Michael Steven Tr & Gaidano Cathlee	Desin	PO Box 49	Jenner Ca 95450
Richard L Tr	Drummond	1183 Ethan Dr	Santa Rosa Ca 95401
	Duncans Mills Trading Co	PO Box 57	Duncans Mills Ca 95430
	Duncans Mills Trading Co	PO Box 96	Duncans Mills Ca 95430
Jay P Tr	Duncanson	615 Sanchez St	San Francisco Ca 94114
Troy Tr Et Al	Duster	3031 Benvenue Ave	Berkeley Ca 94705
Alldridge M Tr & Mary Ann Tr	Evans	PO Box 105	Jenner Ca 95450
Kathleen A	Fenton	PO Box 86	Jenner Ca 95450
Joan	Gieseke	PO Box 179	Jenner Ca 95450
Vivian Lee Tr	Harris	5630 Ocean View Dr	Oakland Ca 94618
Joyce C Tr Et Al	Herzer	121 Marlow Dr	Oakland Ca 94605
Richard J & Laura L Tr	Hieb	PO Box 52	Jenner Ca 95450
Carolyn S Tr	Hofstetter	850 Webster St, Apt 920	Palo Alto Ca 94301
Nancy Tr Et Al	Jacobsen	PO Box 219	Forest Knolls Ca 94933
	Jenner Community Club	10432 Highway 1	Jenner Ca 95450
Junona Et Al	Jonas	4016 20Th St	San Francisco Ca 94114

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARATION – LIST 3

FIRST NAME	LAST NAME	MAILING ADDRESS	CITY, STATE, ZIP CODE
Della M Tr	Jorgensen	5313 Callister Ave	Sacramento Ca 95819
Patrick & Nanette	Kearney	1867 Elkwood Dr	Concord Ca 94519
Elwood F Tr & Gloria M Tr	Keller	745 Nebraska Dr	Santa Rosa Ca 95405
Maureen C Et Al	Lee	760 Paradiso Ct	Soquel Ca 95073
Mark Daniel	Mann	8450 Starr Rd	Windsor Ca 95492
Daniel & Cherie	Mannion	PO Box 274	Duncans Mills Ca 95430
Kelly Et Al	Martin	PO Box 83	Jenner Ca 95450
Kimberly	Mckenzie	4516 Wessex Ln	Salida Ca 95368
James H Tr	Mckerrow	1512 Willard St	San Francisco Ca 94117
John A Tr Et Al	Mountain	PO Box 114	Jenner Ca 95450
Scott T Tr	Murphy	PO Box 5711	Petaluma Ca 94955
Richard A Tr	Murphy	PO Box 69	Jenner Ca 95450
Karen	Nierhake	848 Corte Briones	Martinez Ca 94553
Richard S & May G	Olsson	55 Austin Creek Rd	Cazadero Ca 95421
Kenneth V & Lisa Ann Tr	Palmer	PO Box 35	Duncans Mills Ca 95430
Family Partnership	Parker	2357 Oak Knoll Dr	Santa Rosa Ca 95403
John Matthew Tr & Linda L	Pearson	PO Box 58	Forestville Ca 95436
Gerald L & Mary T Tr	Quigg	PO Box 210024	Auke Bay Ak 99821
W J & Frances K	Richeson	1750 9Th Ave	Sacramento Ca 95818
William G Et Al	Ricioli	2200 Laughlin Rd	Windsor Ca 95492
	Rivers End Properties	PO Box 133	Jenner Ca 95450
Charles F Tr & Irma D Tr	Schelter	1708 San Ramon	Way Santa Rosa Ca 95409
Daryl J & Joan N Tr	Schloss	5043 Boulder Ln	Santa Rosa Ca 95405
David P Tr	Schwarze	PO Box 3441	Yountville Ca 94599
David I & Susan O	Shumaker	PO Box 164	Duncans Mills Ca 95430
Joel M & Phillip B	Slaton	PO Box 40	Duncans Mills Ca 95430
Patricia Miriam Tr Et Al	Solem	807 March Ave	Healdsburg Ca 95448
	Sonoma Land Trust	966 Sonoma Ave	Santa Rosa Ca 95404
Frederick	Stanley	PO Box 156	Duncans Mills Ca 95430
	State Of California	650 Howe Ave	Sacramento Ca 95825
	State Of California	915 Capitol Mall Rm 108	Sacramento Ca 95814
	State Of California	Capitol Bldg	Sacramento Ca 95814
Stephanie Et Al	Thatcher	PO Box 133	Jenner Ca 95450
Elinor G Tr	Twohy	PO Box 21	Jenner Ca 95450

DISTRUBUTION LIST - HARD COPY NOTICE OF PREPARATION – LIST 3

FIRST NAME	LAST NAME	MAILING ADDRESS	CITY, STATE, ZIP CODE
Cynthia L	Urbina	PO Box 11	Jenner Ca 95450
Scott N Tr	Verse	PO Box 164	Jenner Ca 95450
Kathleen E & Paul	Vitale	1530 Tuolumne St	Vallejo Ca 94590
Preston S	Wheaton	PO Box 1403	Olympia Wa 98507

* A postcard notification of the NOP's availability was sent to 1,231 parties. The distribution list was developed based on the SCWA databases of regulatory agencies with jurisdiction, local organizations, business, and interest groups, and property owners based on parcels data. This list also included Sonoma County and neighboring jurisdiction city and county governments and their resource departments and chambers of commerce, farm bureaus, special water and wastewater districts, school districts, and other related commissions in and around Sonoma County. A full copy of the postcard list is available upon request and will be included in the Administrative record.

APPENDIX 2

Guerneville Flow Data Relative to Closure Events During the Lagoon Management Period (1996 - 2009)

				SCWA Estuary Closure and Breach Data					USGS 11467000 RUSSIAN R NR GUERNEVILLE CA		
									Mean Daily Flow on Closure Date (cfs)		
				5	15						
				10	15				All Data	Within Lagoon	
Year	Date Closed		Date Breached			Height when breached	Type of Breach	Comment		Management Period	
1996	6/29/1996		7/5/1996	7	5	7.9	SCWA		268.0	268.00	
1996	7/24/1996		8/3/1996	8	3	7.8	Citizen		176.0	176.00	
1996	8/23/1996		8/27/1996	8	27	5.1	Citizen		199.0	199.00	
1996	9/6/1996		9/8/1996	9	8	4.3	Citizen		218.0	218.00	
1996	9/14/1996		9/25/1996	9	25	7.6	SCWA		179.0	179.00	
1996	10/7/1996		10/15/1996	10	15	8.8	SCWA		230.0	230.00	
1996	NA		11/6/1996	11	6	NA	Natural		--	--	
1997	3/21/1997		3/24/1997	3	24	7.3	Natural		1,120.0	--	
1997	3/30/1997		3/31/1997	3	31	9.4	SCWA		679.0	--	
1997	4/18/1997		4/23/1997	4	23	NA	Natural		475.0	--	
1997	5/2/1997		5/3/1997	5	3	NA	Natural		423.0	--	
1997	5/15/1997		5/22/1997	5	22	NA	SCWA		307.0	307.00	
1997	6/2/1997		6/9/1997	6	9	NA	SCWA		237.0	237.00	
1997	6/16/1997		6/26/1997	6	26	NA	SCWA		193.0	193.00	
1997	8/9/1997		8/20/1997	8	20	NA	SCWA		167.0	167.00	
1997	9/9/1997		9/19/1997	9	19	NA	SCWA		155.0	155.00	
1997	9/26/1997		9/29/1997	9	29	NA	SCWA		196.0	196.00	
1997	10/3/1997		10/11/1997	10	11	NA	SCWA		180.0	180.00	
1997	10/26/1997		11/3/1997	11	3	NA	SCWA		215.0	--	
1997	11/7/1997		NA	NA	NA	NA	SCWA		236.0	--	
1998	8/26/1998		9/1/1998	9	1	6.4	NA		182.0	182.00	
1998	9/7/1998		9/12/1998	9	12	NA	NA	Gage wasn't working	258.0	258.00	
1998	9/13/1998		9/14/1998	9	14	8.2	NA		286.0	286.00	
1998	9/25/1998		9/28/1998	9	28	7.8	NA		305.0	305.00	
1998	10/5/1998		10/8/1998	10	8	6.5	NA		252.0	252.00	
1998	10/15/1998		10/19/1998	10	19	7.0	NA		260.0	--	
1998	10/23/1998		10/27/1998	10	27	7.4	NA		251.0	--	
1998	10/28/1998		11/2/1998	11	2	5.2	NA		337.0	--	
1999	6/12/1999		6/15/1999	6	15	7.4	SCWA		293.0	293.00	
1999	6/24/1999		7/1/1999	7	1	6.3	SCWA		220.0	220.00	
1999	9/17/1999		9/23/1999	9	23	6.6	SCWA		211.0	211.00	
1999	9/25/1999		10/4/1999	10	4	7.0	SCWA		198.0	198.00	
1999	10/7/1999		10/21/1999	10	21	7.4	SCWA		199.0	--	
1999	11/1/1999		11/4/1999	11	4	5.7	Natural		268.0	--	
1999	11/6/1999		11/10/1999	11	10	8.9	SCWA		227.0	--	
2000	5/7/2000		5/9/2000	5	9	8.5	SCWA		568.0	--	
2000	6/16/2000		6/21/2000	6	21	6.9	SCWA		188.0	188.00	
2000	8/28/2000		9/5/2000	9	5	7.6	SCWA		167.0	167.00	
2000	10/7/2000		10/11/2000	10	11	6.5	SCWA		133.0	133.00	
2000	10/24/2000		10/27/2000	10	27	6.9	SCWA		199.0	--	
2000	11/4/2000		11/7/2000	11	7	6.9	SCWA		296.0	--	
2000	11/10/2000		11/13/2000	11	13	6.7	SCWA		286.0	--	
2000	11/21/2000		11/24/2000	11	24	7.3	SCWA		282.0	--	
2000	11/27/2000		11/30/2000	11	30	7.7	SCWA		290.0	--	
2000	12/3/2000		12/6/2000	12	6	7.7	SCWA		361.0	--	
2000	12/27/2000		12/29/2000	12	29	7.1	SCWA		355.0	--	
2001	12/30/2000		1/3/2001	1	3	7.3	SCWA		341.0	--	
2001	4/4/2001		4/9/2001	4	9	8.2	SCWA		454.0	--	
2001	4/16/2001		4/19/2001	4	19	6.1	SCWA		331.0	--	
2001	4/25/2001		5/1/2001	5	1	8.2	SCWA		354.0	--	
2001	5/2/2001		5/4/2001	5	4	5.3	SCWA		322.0	--	
2001	5/15/2001		5/21/2001	5	21	5.7	SCWA		248.0	248.00	
2001	9/25/2001		10/8/2001	10	8	7.5	SCWA		138.0	138.00	
2001	10/13/2001		10/31/2001	10	31	7.5	SCWA		103.0	--	
2001	11/5/2001		11/13/2001	11	13	11.1	Natural		139.0	--	
2002	5/30/2002		6/4/2002	6	4	8.1	SCWA		276.0	276.00	
2002	10/1/2002	*	10/5/2002	10	5	5.0	Natural		164.0	164.00	
2002	10/21/2002		11/1/2002	11	1	7.5	SCWA		155.0	--	
2002	11/15/2002		11/18/2002	11	18	6.7	SCWA		340.0	--	
2002	11/19/2002		11/25/2002	11	25	7.5	SCWA		271.0	--	
2002	11/27/2002		12/3/2002	12	3	7.0	SCWA		226.0	--	
2003	3/13/2003		3/15/2003	3	15	7.9	Natural		821.0	--	
2003	6/10/2003		6/13/2003	6	13	6.4	Natural		477.0	477.00	
2003	10/8/2003		10/14/2003	10	14	6.2	SCWA		183.0	183.00	
2003	10/18/2003		10/27/2003	10	27	6.8	SCWA		157.0	--	
2003	11/17/2003		11/20/2003	11	20	6.6	SCWA		365.0	--	
2004	5/2/2004		5/6/2004	5	6	8.4	SCWA		440.0	--	
2004	4/14/2004		4/18/2004	4	18	8.0	Natural		601.0	--	
2004	7/25/2004		8/6/2004	8	6	5.9	Natural		159.0	159.00	
2004	10/10/2004		10/24/2004	10	24	NA	Citizen		106.0	--	
2004	11/5/2004		11/12/2004	11	12	8.9	Citizen		303.0	--	
2004	11/22/2004		11/30/2004	11	30	9.6	Citizen		326.0	--	
2005	9/16/2005		9/22/2005	9	22	6.0	SCWA		184.0	184.00	
2005	10/3/2005		10/17/2005	10	17	8.3	SCWA		161.0	--	
2005	10/25/2005		11/1/2005	11	1	8.0	SCWA		188.0	--	
2005	11/25/2005		11/29/2005	11	29	8.2	SCWA		322.0	--	
2006	10/23/2006		10/29/2006	10	29	4.5	Natural		138.0	--	
2006	11/12/2006		11/14/2006	11	14	5.8	Natural		302.0	--	
2006	11/16/2006		11/19/2006	11	19	5.5	Natural		391.0	--	
2006	11/23/2006		11/25/2006	11	25	5.4	Natural		303.0	--	
2006	12/8/2006		12/10/2006	12	10	7.6	Natural		320.0	--	
2007	1/29/2007		2/2/2007	2	2	8.5	SCWA		381.0	--	
2007	2/5/2007		2/9/2007	2	9	8.9	SCWA		358.0	--	
2007	4/7/2007		4/11/2007	4	11	7.7	SCWA		492.0	--	
2007	4/13/2007		4/17/2007	4	17	7.7	SCWA		472.0	--	
2007	4/24/2007		4/26/2007	4	26	7.6	SCWA		903.0	--	
2007	10/12/2007		10/22/2007	10	22	9.1	Natural		227.0	--	
2007	11/5/2007		11/11/2007	11	11	6.4	SCWA		237.0	--	
2007	11/17/2007		11/21/2007	11	21	5.8	SCWA		250.0	--	
2007	12/3/2007	*	12/4/2007	12	4	6.4	SCWA		257.0	--	
2007	12/13/2007	*	12/18/2007	12	18	9.8	SCWA		307.0	--	
2008	4/24/2008		4/26/2008	4	26	4.5	Natural		350.0	--	
2008	4/27/2008		5/1/2008	5	1	6.1	SCWA		343.0	--	
2008	5/2/2008		5/6/2008	5	6	7.0	SCWA		323.0	--	
2008	5/11/2008		5/15/2008	5	15	5.8	SCWA		272.0	272.00	
2008	5/16/2008		5/22/2008	5	22	6.3	SCWA		211.0	211.00	
2008	5/24/2008		5/29/2008	5	29	5.7	SCWA		211.0	211.00	
2008	6/27/2008		7/10/2008	7	10	6.0	SCWA	Unsuccessful breaching attempts also made on 2-Jul and 7-Jul.	122.0	122.00	
2008	9/6/2008		9/15/2008	9	15	5.5	SCWA		137.0	137.00	

SCWA Estuary Closure and Breach Data									USGS 11467000 RUSSIAN R NR GUERNEVILLE CA	
									Mean Daily Flow on Closure Date (cfs)	
				5	15					
				10	15				All Data	Within Lagoon
Year	Date Closed		Date Breached			Height when breached	Type of Breach	Comment		Management Period
2008	10/3/2008		10/9/2008	10	9	5.9	SCWA		138.0	138.00
2008	10/25/2008		11/3/2008	11	3	8.9	SCWA	Unsuccessful breaching attempt also made on 30-Oct.	134.0	--
2008	11/28/2008		12/8/2008	12	8	8.0	SCWA	Unsuccessful breaching attempt also made on 3-Dec.	174.0	--
2008	12/22/2008		12/24/2008	12	24	4.7	Natural		433.0	--
2009	1/5/2009		1/8/2009	1	8	5.3	Natural		478.0	--
2009	NA		1/22/2009	1	22		SCWA		--	--
2009	4/13/2009		4/16/2009	4	16	5.8	Natural		456.0	--
2009	6/12/2009		6/25/2009	6	25	6.4	SCWA		202.0	202.00
2009	9/6/2009		10/5/2009	10	5	7.3	SCWA		71.0	71.00
2009	10/14/2009		10/16/2009	10	16	7.7	SCWA		570.0	--
2009	10/22/2009		10/26/2009	10	26	6.8	SCWA		259.0	--
2009	11/2/2009		11/9/2009	11	9	7.6	SCWA	Unsuccessful breaching attempt	212.0	--
2009	NA		11/10/2009	11	10	8.1		Successful	--	--
2009	11/21/2009	**	11/23/2009	11	23	6.9	SCWA	Unsuccessful breaching attempt	258.0	--
2009	NA		11/24/2009	11	24	7.5		Successful	--	--
2009	11/27/2009	**	12/2/2009	12	2	7.5	SCWA		239.0	--
2009	12/8/2009		12/13/2009	12	13	9	SCWA		257.0	--
2009	12/21/2009		12/23/2009	12	23	8.2	SCWA		484.0	--
2009	12/25/2009		12/28/2009	12	28	9.1	SCWA		426.0	--
								average:	293.7	209.5
								median:	258.0	198.0
								min:	71.0	71.0
								max:	1,120.0	477.0
*	Dates modified from original data set provided by SCWA (original dates were out of sequences and asssumed to be in error, i.e., the year in the original data set was listed as 2008).									
**	A range of dates were given in the original data set for the closure date; date indicated here is last date of given range.									