

# CHAPTER 1

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## 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<sup>1</sup> across the mouth of the Russian River cuts off the tidal connection between the ocean and the Russian River and creates a lagoon.<sup>2</sup> 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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<sup>1</sup> 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.

<sup>2</sup> 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).<sup>3</sup> 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.<sup>4</sup>

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

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

<sup>4</sup> 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
<b>Public Agencies – FEDERAL</b>				
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
<b>Public Agencies – STATE</b>				
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
<b>Public Agencies – STATE (cont.)</b>				
		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
<b>Public Agencies – STATE (cont.)</b>				
		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_NCRWQC B	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
<b>Public Agencies – STATE (cont.)</b>				
		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.	
<b>Public Agencies - LOCAL</b>				
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 <i>Ludwigia</i> 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_NSCAPC D	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
<b>Public Agencies - LOCAL (cont.)</b>				
		7	In 2009 several locations tested positive for <i>Enterococcus</i> . 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.	
<b>Organizations/ Groups</b>				
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
<b>Organizations/ Groups (cont.)</b>				
		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
<b>Organizations/ Groups (cont.)</b>				
		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
<b>Organizations/ Groups (cont.)</b>				
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
<b>Organizations/ Groups (cont.)</b>				
		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
<b>Organizations/ Groups (cont.)</b>				
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
<b>Organizations/ Groups (cont.)</b>				
		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 <i>Ludwigia</i> 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 <i>Ludwigia</i> at certain locations.	2.4

**TABLE 1 (Continued)  
COMMENT ISSUES SUMMARY**

Designator	Agency and Signatory	Comment Designator	Comment Summary/Topic	Master Response
<b>Organizations/ Groups (cont.)</b>				
		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
<b>Organizations/ Groups (cont.)</b>				
		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 <i>Sonoma County Gazette</i> . 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
<b>Organizations/ Groups (cont.)</b>				
		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 environment 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
<b>Organizations/ Groups (cont.)</b>				
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 June 17, 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
<b>Organizations/ Groups (cont.)</b>				
		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.	
<b>Individuals</b>				
	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
<b>Individuals (cont.)</b>				
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
<b>Individuals (cont.)</b>				
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 <i>Ludwigia</i> . Questions if there is a plan to eradicate <i>Ludwigia</i> , so more silt is not trapped and oxygen from the river is not depleted. Questions if <i>Ludwigia</i> , 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, <i>Ludwigia</i> , 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
<b>Individuals (cont.)</b>				
		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 <i>Ludwigia</i> 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
<b>Individuals (cont.)</b>				
NA_Delon	Barbara Delonno	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 if it 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
<b>Individuals (cont.)</b>				
		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
<b>Individuals (cont.)</b>				
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
<b>Individuals (cont.)</b>				
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
<b>Individuals (cont.)</b>				
		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 though 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
<b>Individuals (cont.)</b>				
		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
<b>Individuals (cont.)</b>				
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
<b>Individuals (cont.)</b>				
		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_OLeary	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
<b>Individuals (cont.)</b>				
		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
<b>Individuals (cont.)</b>				
		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
<b>Individuals (cont.)</b>				
		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 <i>Enterococcus</i> . Only other recorded incident was July 2002 for <i>E. coli</i> , 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
<b>Public Hearing</b>				
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
<b>Public Hearing (cont.)</b>				
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, <i>Ludwigia</i> 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
<b>Public Hearing (cont.)</b>				
H_Delon	Barbara Delonno	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
<b>Public Hearing (cont.)</b>				
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