



# SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

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North Marin Water District  
Chris DeGabriele, General Manager  
PO Box 146, Novato CA 94948

Point Reyes National Seashore  
Don Neubacher, Superintendent  
Point Reyes Station, CA 94956

Gentlemen:

The Sierra Club Marin Group has reviewed the North Marin Water District (NMWD) Notice of Mitigated Negative Declaration for the Olema Water Tank Replacement Project which is located on land owned by Point Reyes National Seashore (PRNS). The Sierra Club finds the Notice and its proposed mitigations adequate except for the following:

- 1) We request that only native plants be used in mitigation measures AQ-1 and G-2 which call for replanting vegetation on exposed cut and fill slopes.
- 2) We request that a nesting bird survey to insure that construction does not result in the loss of active bird nests. If nesting birds were identified, construction should be halted until the bird have fledged, or, depending on the species, be halted until August 15.

In addition to these specific comments, the Sierra Club urges both NMWD and PRNS to use this Project as an opportunity to consult on and resolve the various issues still outstanding between PRNS and NMWD. These include, but are not limited to:

- a) The lack of a written document memorializing the agreement for NMWD to supply water to PRNS. Such document should include PRNS in NMWD's Supply District in return for acknowledging PRNS's substantial financial contributions to the cost of converting the formerly private Olema system. Such agreement should also provide for reasonably anticipated changes in use, such as the conversion of PRNS's Red Barn from storage to offices and classroom. Offsetting the reasonable expansion of the District to include PRNS, NMWD should file with LAFCO to exclude from its sphere of influence the eastshore lands north of Point Reyes Station, which are unreasonable to service.
- b) The impact, if any, of the PRNS Giacomini Marsh Restoration on salt water intrusion into NMWD's wells; however NMWD's Negative Declaration for the 0.67 Giacomini Water Right declared that NMWD's diversion wells were not connected to Lagunitas Creek, so impacts from any marsh restoration should therefore be minimal. If NMWD wishes further assurance, then NMWD and PRNS should explore the possible trade of NMWD surplus water rights to PRNS in return for assurance from PRNS that its exercise of PRNS's Giacomini water rights will not increase salt water intrusion into NMWD's wells.

Sincerely,

Gordon Bennett, Vice Chair Sierra Club