

December 3, 2012

Dain Anderson, Environmental Services Coordinator
Marin Municipal Water District
220 Nellen Avenue
Corte Madera, California 94925



Via email: wphipeir@marinwater.org

Re: Draft Wildfire Protection and Habitat Improvement Plan (WPHIP) EIR

Dear Mr. Anderson:

Marin Conservation League requests that the EIR for the WPHIP provide information on the issues noted below. We are particularly concerned that the management actions that are undertaken fully protect the watershed's habitat and wildlife and water quality.

1. How were the waterway buffer widths decided upon that are in the district guidelines for implementation under Approach #2? Is information available on other agencies' experience in using the proposed herbicides near waterways, how/if they established and implemented buffer widths, and how successful their approach was? What landscape characteristics, if any, determine buffer distance from district reservoirs and creeks that flow through district lands.
2. Is there information on how long the toxic components of the proposed conventional herbicides bind to the soil after application? Compare movement of conventional herbicides and their break down products (including surfactants) in groundwater and in surface runoff. What are breakdown products and do they retain toxic properties in soils or when exposed to air above ground? Do breakdown products remain within plant tissues, including roots, of target species? Are herbicides like glyphosate ever taken up by roots of non-target species?
3. What is the prognosis for expansion of any of the weeds of concern, e.g. Table 6-9, under Approach #1? Are there any that would not be permanently eradicated?
4. Are there measures that could be taken to insure wildlife (herbivorous mammals, birds) do not eat contaminated vegetation following application?
5. What would be the effect on the long-term biodiversity on district lands of the two approaches, under the same funding assumptions used in the draft plan?
6. Would the changing, and slightly warming, climate be expected to affect growth rate and spread of vegetation on district lands over the life of the WPHIP? If so, would this affect the proposed treatment schedule, e.g. shorten or lengthen intervals between treatment?
7. Zones 2 and 3 seem to buffer most of the highly infested Zone 5 lands from private properties along the district perimeter. Under Approach 1, more than two thirds of broom infestation in Zone 2, and much in Zone 3, would not be treated. If this is the case, how would this affect fire risk, invasion of exotics into the adjacent and nearby private properties?

PHONE: 415.485.6257
FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org
WEB: marinconservationleague.org

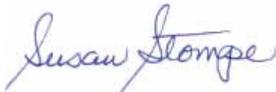
ADDRESS: 175 N. Redwood Dr., Ste. 135
San Rafael, CA 94903-1977



8. How would adoption of the two approaches approximately affect the timelines for action in Chapters 4 and 5? These are in Tables 4-2, 4-3, 4-04 and 5-1.
9. What are the impacts of wildfire on the watershed and water quality?
10. If the district is unable to complete the recommended fuel break system how does this affect actions that would be required of other public agencies and adjacent private land-owners to minimize wildfire risk on their lands?

Thank you for this opportunity to comment.

Yours truly,

A handwritten signature in blue ink that reads "Susan Stompe". The signature is written in a cursive style with a large initial 'S'.

Susan Stompe, President