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April 13, 2026

Marin Municipal Water District
Attn: Lucy Croy, Water Resources Manager
220 Nellen Avenue
Corte Madera, CA 94925
submitted via email: arcproject@marinwater.org

Re: North Marin Water District Comments in Response to the
Notice of Preparation of Environmental Impact Report for the
Atmospheric River Capture Project

Dear Ms. Croy:

Thank you for the opportunity to comment on the subject Notice of Preparation, dated March 13, 2026. The North Marin Water District (District) has reviewed the notice and has the following comments below. The District provides these comments in its capacity as a Responsible Agency pursuant to CEQA Guidelines section 15096, because the proposed project contemplates: (1) a new transmission pipeline that begins within and traverses District territory; (2) a physical connection to the District's existing North Marin Aqueduct (NMA) transmission main; (3) potential exercise of District approval authority under the parties' existing 2022 Interconnection Agreement, including provisions concerning future projects and associated interconnections; (4) use of District easements; and (5) potential exercise of District approval authority regarding the use, sale, or transfer of District-owned lands.

1. The District is generally supportive of the ARC Project as it is intended to enhance water supply resiliency for Marin Water (MMWD), but also for the North Bay region including each community that relies on the Russian River for water supply.
2. The District requests that the point of delivery (POD) near Stafford Lake in unincorporated Marin County be moved east and located within APN 125-090-07 which is owned by the District, rather than the location shown in the notice within APN 125-090-19 which is owned by the County of Marin.
3. The District requests that the scope of the ARC Project's Environmental Impact Report include all District ancillary facilities and pipeline improvements or replacements agreed to by both parties under separate terms, if applicable. District and MMWD are currently discussing the potential to include certain elements within and adjacent to the proposed Project's pipeline corridor.
4. MMWD should exercise care when determining the Project pipeline's alignment so as not to conflict with existing District transmission, distribution, customer service lines, and other associated appurtenances within the alignment. Where crossing existing District facilities is required, the construction documents should include language to notify the District at least 72 hours prior to commencement of work or to require other coordination with the District, and should also expressly require the contractor to exercise caution and to coordinate with the District when excavating near District pipelines or facilities.

5. MMWD is considering the use of the District-owned land near the Stafford Treatment Plant (STP) for the “Stafford Lake Pump Station and dechlorination facility”. District is amenable to the use of this land for the Project; however, the District has existing uses of this land that will have to remain, including an 18-inch pipeline (STP treatment water transmission) and the access road to STP and other District lands.
6. District has certain operational and hydraulic constraints that the Project must address. These constraints include but are not limited to:
 - a. Maximum velocities in the NMA cannot exceed 8 feet per second (fps);
 - b. Maximum pressures or Hydraulic Grade Lines (HGLs) within the NMA and at the NMA connection;
 - c. Surge protections;
 - d. Coordination of operations;
 - e. Other operational constraints depending on the final Project design and operational protocols.
7. District strongly recommends that MMWD closely coordinate with the City of Novato and County of Marin regarding the Project pipeline’s alignment and construction including traffic control measures, pedestrian safety, and pavement restoration.
8. District may evaluate and make its own independent CEQA findings regarding future actions associated with the Project, including but not limited to:
 - a. Interconnection with the NMA;
 - b. Amendments to the Interconnection Agreement;
 - c. Sale or transfer of a portion of APN 125-100-13 to MMWD;
 - d. District’s easement rights along the NMA and potentially other locations;
 - e. Construction and operation of the Stafford Lake POD;
 - f. Any element that may be included in the Project that is District water infrastructure (see Comment #3 above);
 - g. Any Project construction that may occur on District owned lands;
 - h. Operational conditions
9. Pursuant to CEQA Guidelines section 15096(c) and (d), the District requests continued consultation meetings with MMWD and project engineers during preparation of the Draft EIR, including review of:
 - a. preliminary pipeline alignments and pump station configurations;
 - b. NMA point of connection;
 - c. hydraulic assumptions;
 - d. operational criteria;
 - e. mitigation feasibility; and
 - f. Interconnection Agreement amendment (or new agreement) concepts.
10. District requests to be included in all future notices regarding this Project and any updated Project timelines.

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If you have any questions, please contact me at (415) 761-8947 or emiller@nmwd.com.

Sincerely,

Eric Miller, PE
Assistant General Manager
North Marin Water District

attachments: none

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