

MINUTE ITEM

This Calendar Item No. 45
was approved as Minute Item
No. 45 at the State Lands
Commission meeting of 3
November 11/27/78
meeting.

CALENDAR ITEM

45.

W 9649
W 9682

11/78
W 9681
W 9897
Priddy

PROPOSED KGRA CLASSIFICATION AND GEOTHERMAL
RESOURCES LEASE OF RESERVED MINERAL INTERESTS,
LAKE AND SONOMA COUNTIES

It is proposed that the Commission classify 4 parcels containing approximately 1,628 acres of land in Lake and Sonoma Counties as known Geothermal Resources Land (KGRA). The parcels in Sonoma County are located along the northwest margin of the Geysers Steam Field and the parcel in Lake County is located along the eastern margin.

Section 6912 (b), of the P.R.C., provides that a known geothermal resources area shall contain at least 1 well capable of producing geothermal resources in commercial quantities.

The State parcels are underlain by the same type of rocks that occur in the proven steam field, lie on structural trend with the steam field, and are bracketed by commercial geothermal wells or wells with steam shows. It is the staff's opinion that the criteria listed above satisfy the requirements of the P.R.C., and that the State parcels shown on Exhibit "A" and described in Exhibit "C" should be declared to be within a known geothermal resources area (KGRA). State Leases PRC 4596 and PRC 4597 were declared to be KGRA lands by the State Lands Commission in May of 1971. The KGRA was extended by the Commission in August of 1976 to include PRC 5217. It is now recommended that the limits of this KGRA to extended to include the State parcels.

Environmental Impact Reports (EIR) have been prepared and certified on the lands shown on Exhibit "B" and described in Exhibit "D". It is proposed to offer the State owned reserved mineral interest lands within the areas covered by the EIR's for lease by competitive bid. The remainder of the lands within the proposed KGRA will be offered for lease when EIRs are prepared for geothermal leasing of these lands.

Pursuant to Section 6912(a) of the P.R.C., lands within a KGRA may be leased by competitive public bid on the basis of cash bonus, net profit or other biddable factor. The State parcels are adjacent to leases that were leased competitive by the Federal Government in 1974. The cash bonus

A 2
S 1

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on these leases were \$478.31 per acre. It is the staff's opinion that the biddable factor should be net profits. Additional parcels will be leased by the Federal Government in November in the same area.

Section 6922, of the P.R.C., provides that the surface landowner may, within 10 days after notification by the Commission, submit a bid identical to the highest acceptable bid, in which case the Commission shall issue a lease to such surface landowner. If the surface landowner does not file such a bid, then the Commission may proceed with the award of the bid.

Four EIRs were prepared by the Sonoma County Planning Commission covering geothermal development in the area including the State parcels. The impacts of the project proposed by staff are essentially the same impacts covered by the EIRs. By notices of determination, the Sonoma County Planning Commission certified that (1) the EIRs were prepared pursuant to the provisions of the CEQA of 1970, as amended; (2) the projects will not have a significant effect on the environment; and (3) the projects have been approved by the Sonoma County Planning Commission. The notices of determination have been filed with the Secretary for Resources, the State Lands Commission, and the County Clerk for Sonoma County, wherein the projects are to be undertaken.

The environmental documents have been reviewed by staff, and it is staff's opinion that the intent of the provisions of CEQA have been satisfied.

EXHIBITS: A. KGRA Map. B. Lease Map.
 C. KGRA Property Description.
 D. Lease Property Description.
 E. EIR Summary.

IT IS RECOMMENDED THAT THE COMMISSION:

1. DETERMINE THAT EIRS HAVE BEEN PREPARED FOR THIS PROJECT BY THE SONOMA COUNTY PLANNING COMMISSION.
2. CERTIFY THAT THE INFORMATION CONTAINED IN THE EIRS OF THE SONOMA COUNTY PLANNING COMMISSION HAS BEEN REVIEWED AND CONSIDERED BY THE STATE LANDS COMMISSION.
3. DETERMINE THAT THE PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.
4. EXTEND THE LIMITS OF THE KNOWN GEOTHERMAL RESOURCES AREA DESIGNATED BY THE COMMISSION ON AUGUST 26, 1976

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(MINUTE ITEM 25), TO INCLUDE THE LANDS DESCRIBED IN EXHIBIT "C" AND BY REFERENCE MADE A PART HEREOF.

5. AUTHORIZE THE STAFF TO OFFER, PURSUANT TO DIVISION 6 OF THE P.R.C., FOR BID FOR THE EXTRACTION OF GEOTHERMAL RESOURCES THE PARCELS DESCRIBED IN EXHIBIT "D" AND BY REFERENCE MADE A PART HEREOF.

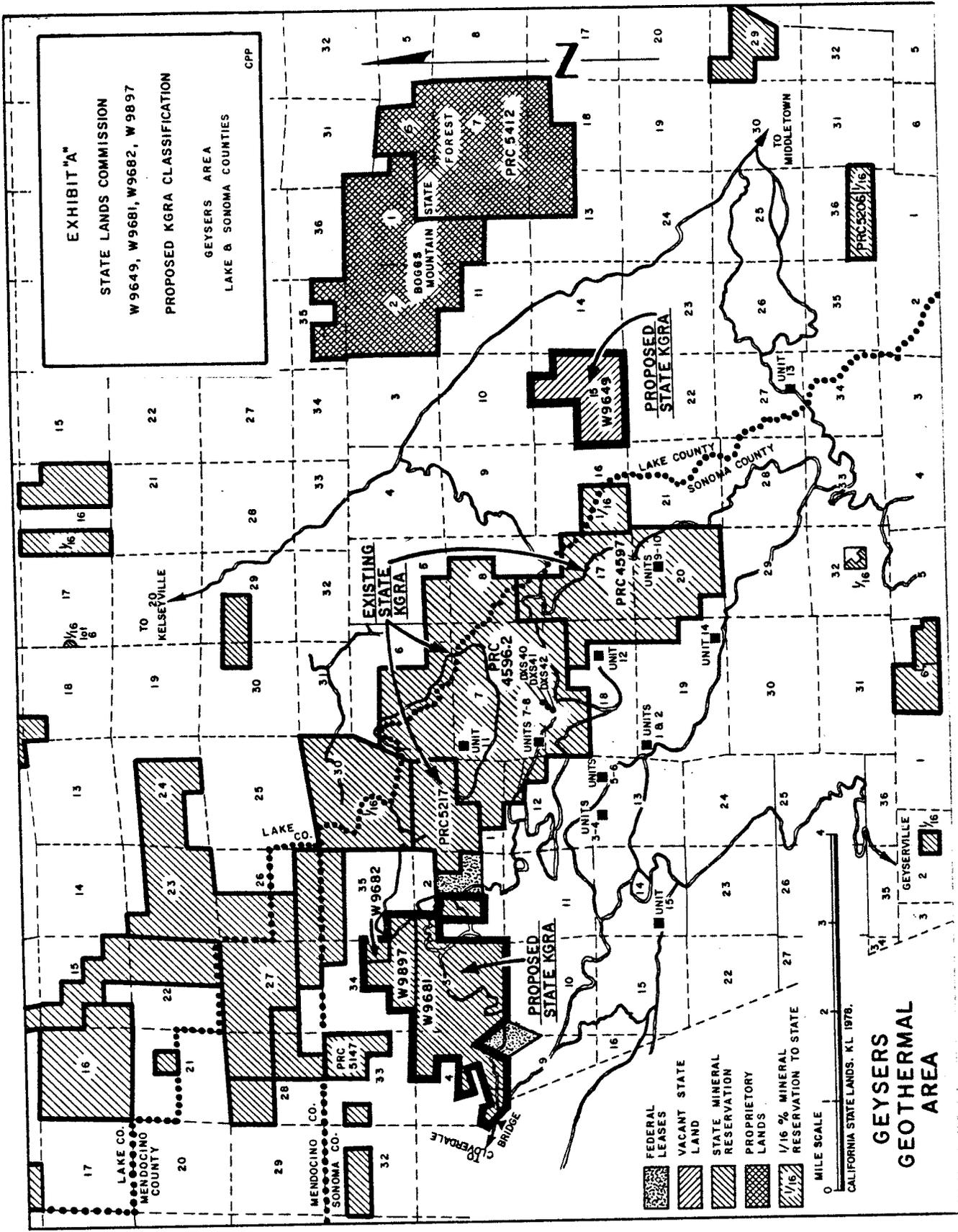


EXHIBIT B'

STATE LANDS COMMISSION
W 9681, W 9682, W 9897

Proposed Geothermal Resources
Lease of Reserved Mineral
Interests

GEYSERS AREA
SONOMA COUNTY

CPP

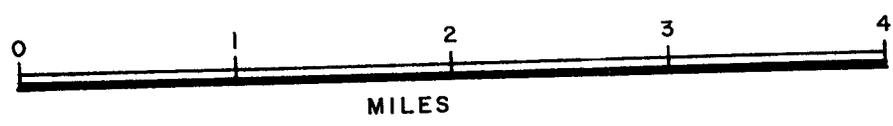
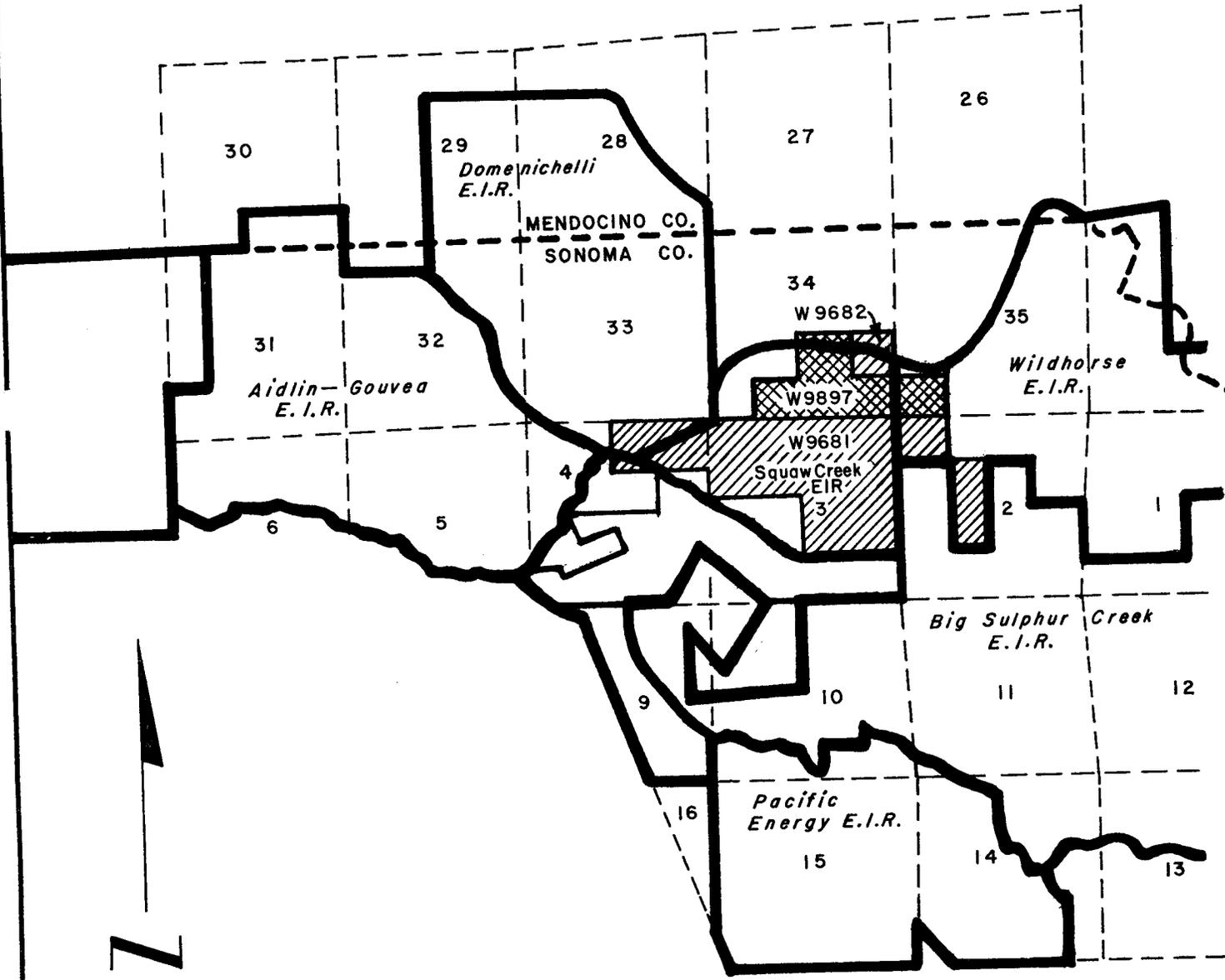


EXHIBIT "C"

PARCEL DESCRIPTIONS PROPOSED KGRA CLASSIFICATION

W 9649

Township 11 North, Range 8 West, MDB&M, Lake County,
California

The S $\frac{1}{2}$, the S $\frac{1}{2}$ of the NE $\frac{1}{4}$ and the NW $\frac{1}{4}$ of the NE $\frac{1}{4}$
of Section 15, containing 440 acres more or less.

W 9681

Township 11 N., Range 9 W., MDB&M
Sonoma County, California

Lots 4, 6 and 11 of Section 2;

Lots 1 and 2, the E $\frac{1}{2}$ of the SW $\frac{1}{4}$, the S $\frac{1}{2}$ of the
SE $\frac{1}{4}$, the N $\frac{1}{2}$ of the SE $\frac{1}{4}$, and the N $\frac{1}{2}$ of Section 3.

Lots 6, 7, 8 and 9, the N $\frac{1}{2}$ of the NE $\frac{1}{4}$ and the
SE $\frac{1}{4}$ of the NE $\frac{1}{4}$ of Section 4.

Containing 948.24 acres more or less.

W 9682

T. 12 N., R. 9 W., MDB&M, Sonoma County, California

The NE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 34;

Containing 40.00 acres more or less.

W 9897

Township 12 North, Range 9 West, MDB&M, Sonoma
County, California

The NW $\frac{1}{4}$ of the SE $\frac{1}{4}$, the S $\frac{1}{2}$ of the SE $\frac{1}{4}$, and the
SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 34; and the SW $\frac{1}{4}$ of the
SW $\frac{1}{4}$ of Section 35, containing 200 acres more or less.

EXHIBIT "D"

PARCEL DESCRIPTIONS PROPOSED GEOTHERMAL LEASE

W 9681

Township 11 N., Range 9 W., MDB&M
Sonoma County, California

Lots 4, 6 and 11 of Section 2;
the N $\frac{1}{2}$ of the SE $\frac{1}{4}$, and the N $\frac{1}{2}$ of Section 3; the N $\frac{1}{2}$ of the NE $\frac{1}{4}$
of Section 4.

Containing 599.18 acres more or less.

W 9682

T. 12 N., R. 9 W., MDB&M., Sonoma County, California

The NE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 34;

Containing 40.00 acres more or less.

W 9897

Township 12 North, Range 9 West, MDB&M, Sonoma
County, California

The NW $\frac{1}{4}$ of the SE $\frac{1}{4}$, the S $\frac{1}{2}$ of the SE $\frac{1}{4}$, and the
SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 34; and the SW $\frac{1}{4}$ of the
SW $\frac{1}{4}$ of Section 35, containing 200 acres more or less.

ENVIRONMENTAL IMPACT REPORTS FOR AMINOIL, USA, INC.'S GEOTHERMAL LEASEHOLDS IN THE UPPER PART OF THE BIG SULPHUR AND SQUAW CREEK DRAINAGES IN NORTHWESTERN SONOMA COUNTY FOR EXPLORATORY DRILLING PROJECTS

Four Environmental Impact Reports were prepared and certified to cover geothermal development by Burmah Oil and Gas (now Aminoil, USA, Inc.) in the Upper Big Sulphur and Squaw Creek drainage northwest of The Geysers, Sonoma County. The EIRs are all regional type analyses for consideration of the total project. Aminoil proposed to drill wells within the areas covered by the Burmah Domenichelli Leasehold, the Burmah Squaw Creek Leasehold, Burmah Wildhorse Leasehold, and Burmah Aidlin-Gouvea Leasehold EIRs.

The Burmah Domenichelli EIR was prepared by the Sonoma County Board of Zoning Adjustments. The draft was circulated through the State Clearinghouse as required by the State EIR Guidelines (14 Cal. Adm. Code) and the Clearinghouse certified by letter of April 29, 1976, that the state environmental review of the project was complete. By Notices of Determination issued on November 12, 1976, the Sonoma County Board of Zoning Adjustments certified that (1) the Environmental Impact Report was prepared pursuant to the provisions of the California Environmental Quality Act of 1970, as amended; (2) that the project will not have a significant effect on the environment; and (3) the project has been approved by the Sonoma County Zoning Board of Adjustments. The study area covers approximately 1200 acres in Sonoma and Mendocino Counties including most of Sections 28 and 33 and the eastern portions of Sections 29 and 32, T. 12 N., R. 9 W., M.D.B. & M., the north line of Sections 32 and 33 separating Sonoma and Mendocino Counties. The northern boundary of the area is roughly the north line of Section 28 and the southern boundary approximates the south line of Section 33.

The Burmah Squaw Creek EIR was prepared by the Sonoma County Board of Zoning Adjustments. The draft was circulated through the State Clearinghouse and the Clearinghouse certified by letter of January 6, 1976, that the state environmental review of the project was complete. By Notice of Determination issued December 23, 1976, the Sonoma County Planning Commission certified that (1) the Environmental Impact Report was prepared pursuant to the provisions of the California Environmental Quality Act of 1970, as amended; (2) the project will not have a significant effect on the environment; and (3) the project has been approved by the Sonoma County Planning Commission. The study area covers approximately 700 acres in northeastern Sonoma County and a small portion of Lake and Mendocino Counties encompassing portions of Section 34, T. 12 N., R. 9 W., and Sections 3 and 4, T. 11 N., R. 9 W., M.D.B. & M.

The Burmah Wildhorse EIR was prepared by the Sonoma County Board of Zoning Adjustments. The draft was circulated through the State Clearinghouse and the Clearinghouse certified by letter of October 17, 1975, that the state environmental review of the project was complete. By Notice of Determination issued November 29, 1975, the Sonoma County Board of Zoning Adjustments certified that (1) the Environmental Impact Report was prepared pursuant to the provisions of the California Environmental Quality Act of 1970, as amended; (2) the project will not have a significant effect on the environment; and (3) the project has been approved by the Sonoma County Planning Commission. The study area covers approximately 1400 acres in northeastern Sonoma County and small portions of Lake and Mendocino Counties including portions of Sections 35 and 36, T. 12 N., R. 9 W., Sections 1 and 2, T. 11 N., R. 9 W., M.D.B. & M.

The Burmah Aidlin-Gouvea EIR was prepared by the Sonoma County Board

of Zoning Adjustments. The draft was circulated through the State Clearinghouse and the Clearinghouse certified by letter of September 2, 1976, that state environmental review of the project was complete. By Notice of Determination issued September 9, 1977, the Sonoma County Zoning Board of Adjustments certified that (1) the Environmental Impact Report was prepared pursuant to the provisions of the California Environmental Quality Act of 1970, as amended; (2) the project will not have a significant effect on the environment; and (3) the project has been approved by the Sonoma County Planning Commission. The study area covers approximately 2240 acres including portions of Sections 4, 5, and 6, T. 11 N., R. 9 W. and Sections 30, 31 and 32, T. 12 N., R. 9 W., M.D.B. & M.

I. Description of the Project:

The reports cover proposed geothermal development of Aminoil's leaseholds on the upper part of Big Sulphur and Squaw Creek drainages northwest of The Geysers Steamfield in Sonoma County. The reports cover roads, drill pads, pipelines and consideration of full field development including construction and operation of powerplants.

II. Project Location:

The proposed project area is located in rugged, mountainous terrain in northwestern Sonoma County.

III. Project Action:

The action involves the following specific steps:

1. Test boring to determine subsurface temperature profile.
2. Drilling one or more exploratory or step-out wells to prove the steam reservoir. Five such wells have already been drilled within the study area.
3. Field development planning including correlating 20-acre blocks

of subsurface well target areas to potential well-head sites at the surface.

4. Drill pad, sump and access road preparation. Approximately 2½ acres of flat area are required to accommodate a drill rig and sump together with tanks, compressors, supply and administration equipment.
5. Field development well drilling. Fifteen to nineteen wells are required to begin operations.
6. Well testing and standby maintenance requires periodic venting of full heads of steam for several hours to several days to clear debris and condensation from the well throat.
7. Siting and construction of the generator unit including generators, turbines, condensers, cooling towers, H₂S scrubbers, condensate reinjection system and transmission towers and lines.
8. Construction of steam transfer pipelines from wells to generator.
9. Drilling, testing and connecting replacement wells to the steam supply system.

IV. Present Environmental Setting:

a. Climate:	Cool	✓Moderate	Hot
b. Air Quality:	Poor	Fair	✓Good
c. Water Quality:	Poor	Fair	✓Good
d. Noise Quality:	Poor	Fair	✓Good
e. Transportation Systems:	✓Poor	Fair	Good
f. Public Utilities:	✓Poor	Adequate	Good
g. Public Services:	✓Poor	Adequate	Good
h. Other Values:	The land is of importance as watershed and wildlife habitat.		

I. Present Land Use: The land has been used primarily as a hunting preserve. Some grazing and logging has also taken place.

d. Transportation Systems: Low Moderate High Short-Term
Long-Term

Comment: As development of this and other geothermal fields in the area proceeds, there will probably be pressure from the developers, workers or suppliers to widen and improve roads into the area. What roads and the extent of the impact such transportation improvements will have will be determined by the direction in which the field is developed.

e. Public Utilities: Low Moderate High Short-Term
Long-Term

Comment: The same growth inducing impacts as described in Item (d).

f. Public Services: Low Moderate High Short-Term
Long-Term

Comment: The same growth inducing impacts as described in Item (d).

g. Energy Consumption: Low Moderate High Short-Term
Long-Term

Comment: Drill rigs are self-contained and provide their own energy. Consumption of fuels for compressors, lighting and rig operations is limited to the drilling period.

h. Growth Inducing: Low Moderate High Short-Term
Long-Term

Comment: Whatever growth induced impacts there are in the fields of transportation, public utilities or public services will not occur within the project area, but mainly outside in nearby towns like Cloverdale, Healdsburg Santa Rose or Ukiah. There will be a slight increase in permanent employees.

IX. Relationship Between Local Short-Term Uses of Man's Environment and The Maintenance and Enhancement of Long-Term Productivity:

The fundamental question to be answered is whether the revenue of geothermal resource development and the resultant energy generation for use elsewhere offsets the cost of land restoration and impacts downstream or in the air shed that must either be a direct or indirect cost to the public at large or paid by those directly affected. The answer requires a change in attitude of exploitation. Extractable resources should not and need not be made at the expense or interruption of other resources in the area. In the case of geothermal extraction, it can be made compatible with existing and future renewable and non-renewable resources, but not on its current basis. Stringent mitigation measures are essential to this underlying concept. Even then, tradeoffs must be made, but these can be made acceptable over the long term.

X. Irreversible Environmental Changes:

Some topographical modifications and resulting increase in erosion will have an impact on water quality and fish and wildlife. There will also be an increase in the amount of gases vented to the air and possible increase in humidity from steam.

XI. Comments and Issues Raised:

BURMAH DOMENICHELLI EIR

1. The Sierra Club made some objections, in that the EIR process was incomplete for giving too little attention to the proposed well site itself. Additional comments were made by the Sierra Club and were answered by Ecoview as follows:

Comment: The discussion of the effects on residents was termed insensitive.

Had the 5 or 6 residents been consulted for their opinions:

Will they not be forced in any way to relocate?

The persons were contacted and it has been determined that they will not be in any way forced to relocate.

Access roads to the drill site will apparently involve the destruction of two springs. Is this justifiable?

Response: The road was rerouted and the spring area avoided.

C: 2. County of Napa Conservation, Development and Planning Department reiterated the policy adopted by Napa County to oppose geothermal leasing of Federal lands because of the potential hazardous effects of geothermal activities on grape growing activities, irrigation and domestic water supplies, recreation usage, the adverse impact on fish and wildlife areas, and the primitive state of programs to mitigate adverse impacts. Several points of alleged inadequacy were indicated, but no specific points or elements identified to which a response could be formulated.

R: We would be glad to do so if these points were clarified and stated as specific questions or errors that need correction.

C: 3. California Department of Fish and Game referred to the fact that if the initial well is successful, additional wells, roads, sumps, pipelines, and a powerplant and related transmission lines will be constructed. They requested that a master plan for the production facility be developed and the environmental impact discussed before exploration drilling is permitted.

R: These comments are the same as those regarding previous EIRs and our response to them is the same. It is not feasible to proceed much farther in identifying field impacts than we already have

until the field can be identified, otherwise the potential problems and ramifications are answered to the best data currently available.

C: Reference is made to fish resource in Alder Creek, Squaw Creek and Big Sulphur Creek without discussing the species present and their habitat needs.

R: These fisheries were discussed in Neilson, et al., 1974a.

C: Mitigative measures described are not binding on the developing company and, therefore, the report is misleading.

R: The EIR can only state the condition and suggestion alternative mitigative procedures to minimize the impacts. It is only through the interpretation of the EIR by the person preparing the use permit or permit to construct that anything said in the EIR is made binding and then only to the extent that the language legally permits. Any permit issued by the State Lands Commission will be subject to the mitigation measures.

C: 4. The California State Lands Division referred to the fact that 31 of 49 drill pads referred to in the Pacific Energy EIR will be located on areas classified in land sensitivity classes 4 and 5, which indicates that these sites have high to very high impact sensitivities. The Division feels that each site should be analyzed individually to determine if such impacts really exist and to suggest mitigation measures where applicable. Landslide potential was discussed and it was felt that the report failed to significantly treat environmental impacts associated with construction activities on these slides. However, well sites on State land will be investigated by State

Lands Division staff prior to approval of well proposals.

5. The California Air Resources Board referred to the fact that the EIR treats the project only as the drilling of a single exploratory well. The Air Resources Board recommended that the EIR address, at least briefly, the problems associated with ultimate development of power-generation facilities on the leasehold.

R: The impacts of total field development are discussed generally. Data will not be available to discuss potential impacts in greater detail until a resource has been identified. Upon discovery of geothermal resources, the preferential right to convert the permit into a geothermal lease will be subject to an additional or supplemental EIR covering proposed commercial operations.

BURMAH WILDHORSE EIR

- C: 1. Pacific Gas and Electric Company referred to the fact that about 20% of the steam extracted bypasses the plant complex.

Union Oil Company has estimated that only five percent of the steam produced at The Geysers is vented to the atmosphere because of shutdowns and that a total of 15 percent is released because of shutdowns, well cleanout, blooie line releases or other reasons.

R: Details and references or data should be shown to verify the PG&E statement.

C: "H₂S can oxidize in the atmosphere to produce SO₂ and SO₃, which are also injurious to plants. If SO₃ is produced, sulfuric acid may be formed by absorption of

water. Insofar as H_2S is oxidized in the atmosphere to sulfuric acid and sulfate ion, it will contribute to two problems: aerosol haze and acid rain."

Adverse impacts resulting from oxidation products of hydrogen sulfide are overstated. The contribution of aerosol haze and acid rain is very small because of the quantity of material released and the expected transformation times. The half life of the conversion of hydrogen sulfide to sulfur dioxide is in the order of days. During this time, the material is transported and diffused over a large area and undergoes other depletion processes.

R: At the writing of these responses, we have reason to believe the impacts are understated. Preliminary results of research by Dr. C. Ray Thompson, of U.C. Riverside Statewide Air Pollution Research Center, indicate symptoms in test plants attributable to H_2S subjected to H_2S environments at levels as low as 300 parts per billion. While the research is preliminary, it appears to be decisive. How these results are to be translated to field situations is not clear at this time. The transformation time for the conversion of hydrogen sulfide to oxides of sulfur is also open to question and may well be considerably shorter than the times commonly assigned.

C: The task of defining air quality in a complex multiple source area such as The Geysers is neither practical nor realistic. A logical alternative to this suggested action is to define the quality of air being transported from this complex area towards the populated areas of interest. This concept is incorporated

into the SRI monitoring program now under development. We believe the SRI program is only a partial solution.

C: "High boron content soils are known to be associated with San Joaquin Valley fever."

The report does not indicate the amount of boron that will be added to the soil. Furthermore, it does not state the concentrations needed for this effect to take place. San Joaquin Valley fever is a dust-born fungal disease. The fungi must be present in the soil along with other factors, including boron, for the disease to exist. The known distribution of San Joaquin Valley fever is limited to the Central Valley. The amount of boron added to the soil from geothermal operations is not presently known.

C: "In particular, no grading should be permitted between September 25 and May 1, except that necessary to repair damage threatening the safety of man, or promising loss of environmental integrity at the site."

Ecoview does not provide the basis for these dates. PG&E has repeatedly indicated that it will not engage in grading activity at The Geysers during the rainy season. Precipitation data does not indicate a seven and one-half month rainy season at The Geysers. PG&E's commitment extends from November 1 to March 1.

R: The dates chosen are based on: (1) the probability that significant amounts of rain will occur in the Mayacmas range by September 25 to seriously effect water quality during runoff, and (2) by May 1, the ground water will have sufficiently

stabilized below field capacity for most soils in the area so that excessively wet soils and unnecessary compaction can be avoided.

C: "Recent photo-interpretation of the geology reveals that about 75% of the land area is landslide prone."

Ecoview does not state the person or persons who conducted this investigation, nor does it state whether the conclusion has been verified by field work.

R: Geological mapping was done by Mr. Eugene Boudreaus, a licensed geologist, and the landslide map was developed by Mr. Michael Dwyer, licensed engineering geologist, from: (1) the geologist's report, (2) aerial photos of several types, (3) review of existing maps, and (4) a thorough field study. The statement is the result of this work.

2. The California Department of Fish and Game made the statement that an EIR must be prepared for the entire development and that this is the only way to understand the impact of the project being reviewed. Contingency plans for blow-outs, blow-downs, roadbeds and other facilities are not addressed. The same response was made to these comments as have repeatedly been made in other EIRs. There is insufficient data that can be generated by the applicant or any other agency that can adequately respond to these comments until the field is defined and specific plans are generated.

R: The mitigation measures proposed are adequate and once the direction and configuration of the field is proposed, the specific mitigations suggested can be adequately dealt with.

C. It was felt that the environmental assessment of proposed access routes indicates that there are sufficient potential adverse impacts to refute the conclusion that these are viable routes. Erosion and deposition of silt would seriously jeopardize the fish habitat and populations in Squaw Creek.

R. There was agreement that the proposed access route, as detailed by the applicant, at the time of the hearing, will impose unnecessary impacts. We have made it clear that changes are necessary and these changes are to be reviewed by the consultants involved to protect the wildlife and aquatic habitats.

C. 3. The Sierra Club as addressed by Hamilton Hess to the Sonoma County Board of Zoning Adjustments stated that there are two matters of a policy nature which the report does not address.

(1) There is a high degree of sensitivity in the proposed development area. Most of it being in Class V. and the remainder in Class IV. Questionable, is this an area which most of the county believes appropriate for geothermal development? The question to be addressed before exploration begins should be, whether exploration should be allowed in new areas prior to their determination of suitability for field development?

(2) Are the overall effects which field development on the leasehold would entail an acceptable incremental increase to the cumulative effects in The Geysers field as a whole? Such problems, as hydrogen sulfide, climatological effects, wildlife habitat reduction, land form modification, erosion and siltation, water quality degradation and the ultimate impact on the Russian River are not addressed.

This is the province of the county government.

BURMAH SQUAW CREEK EIR

1. Comments were made by the Bureau of Land Management and by the Fish and Wildlife Service, both of the U.S. Department of Interior. For example:

C: Regarding visual and aesthetic resources, the BLM does not feel that the significance of visual impact should be related to remoteness. This concept could lead, other factors aside, to allowing complete devastation of the landscape as long as it was not easily viewable at present...

R: Remoteness, as well as the commitment of areas within a viewshed to similar uses which have similar visual impacts, is an important consideration...If it is given that such a development will take place, the importance of the visual impact will depend on the exposure of the site (visibility/remoteness) as well as on all other mitigation measures proposed.

C: 2. The Fish and Wildlife Service suggests that sediment basins could be modified to provide a permanent water source and riparian habitat. They suggest also additional wildlife management where possible.

R: Sediment basins would help preserve stream habitat by preventing increased siltation but would not provide significant riparian habitat augmentation even if year-round water were available (which it apparently is not). Wildlife enhancement programs must be coordinated with the landowner, who runs cattle on the land. Several conflicts are possible; however, if carefully planned and coordinated, a potential mitigation measure of some value would result.

AIDLIN-GOUVEA EIR

1. Michael W. Tolmasoff, Air Pollution Control Officer, Northern Sonoma County Air Pollution Control District, commented that the H₂S concentration isopleths were grossly misleading and should be removed or redone.

The consultant responded by showing data used by Ecoview and those submitted by the District to indicate that the values were in close agreement. The variation among the individual units was attributed to differences in steam flow and would be expected to vary slightly from well to well.

2. The Division of Forestry commented that because of the remote location of the project and long travel times for fire crews to reach the scene, a wildfire could cause widespread damage to watershed and water quality as well as to structures in the area. The Division recommended that prior to issuance of and as a condition of the use permit that a detailed written fire plan be approved by the Division.

The consultant said no response was necessary.

3. The Solid Waste Management Board noted the report states, "Spillage or dumping of waste material is a highly localized impact." The Board noted, however, if these wastes are not adequately contained immediately after spillage occurs, the magnitude of the impacts could be greater. It was recommended that adequate mitigation measures such as protective berms, contingency cleanup plans and adequate disposal sites be developed. The Board also noted the report states that drilling wastes will either be transported to a Class I disposal site or will be treated and

and disposed of at an on-site sump. The Board noted the nearest Class I site was in Contra Costa County and this option would not only be costly, but posed the danger of accidents during transport. They recommended disposal in an approved regional site.

The consultant responded that at the time the EIR was written, no regional disposal site was available, and only circumstantial evidence supports the contention that the materials are hazardous except in catastrophic circumstances.