

**COMMENT LETTER 63 - MARCI AND DON CAMACHO (SEPTEMBER 29, 1996),
RECEIVED OCTOBER 1, 1996**

Response to Comment 63-1

Comment Summary: The comment states that the potential for agricultural irrigation to cause failure of septic systems in the Town of Bloomfield is inadequately addressed.

As evaluated in Impact 5.7.3 on page 4.5-53 of the Draft EIR/EIS, results of hydrogeologic evaluation indicate that agricultural irrigation will not result in significant groundwater mounding at any of the West County reservoir sites. As indicated in Table 4.5-3 (page 4.5-22 of the Draft EIR/EIS) mounding is considered significant if groundwater were raised to within six feet of the ground surface. Groundwater deeper than six feet below the ground surface will not interfere with safe operation of a septic system. Additional information is presented in Section 5.4 of Appendix H-1 (Hydrogeology of Storage/Reuse Areas and Evaluation of Potential Impacts to Groundwater) of the Draft EIR/EIS.

Response to Comment 63-2

Comment Summary: The comment states that impacts of agricultural irrigation on groundwater quality at wells in the Town of Bloomfield are inadequately addressed.

As evaluated in Impact 5.7.1 on page 4.5-52 of the Draft EIR/EIS, results of groundwater quality analyses indicate that agricultural irrigation in the West County will not result in significant groundwater quality degradation. Additional information is presented in Section 5.6 of Appendix H-1 (Hydrogeology of Storage/Reuse Areas and Evaluation of Potential Impacts to Groundwater) of the Draft EIR/EIS.

Response to Comment 63-3

Comment Summary: The comment states that the potential for irrigation used for intensive farming practices to cause erosion and infill in a federally recognized flood plain is inadequately addressed.

The potential for agricultural irrigation to cause erosion of topsoil is evaluated in Impact 2.7.3 on pages 4.2-22 and 4.2-23 on the Draft EIR/EIS. This section summarizes a more detailed analysis presented in Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives). This analysis concludes that for most types of agriculture, erosion will be less than existing, but could be significant for new orchards and vineyards on slopes greater than 10 percent and for specialty crops on slopes greater than 5 percent. Mitigation measures are proposed for these two categories of crops that could present problems for erosion. With mitigation, erosion impacts will not be significant; and therefore, will not cause infill in any nearby flood plains to be significant.

Response to Comment 63-4

Comment Summary: The comment states that long-term buildup of metals and other toxic substances in water and soil is insufficiently addressed.

Potential accumulation of metals in soils is evaluated in Impact 2.7.4 on pages 4.2-23 through 4.2.27; significant effects were not identified. Section 4.6, Water Quality, presents information on water quality impacts in West County. Impacts of agricultural irrigation on surface water are evaluated in Impacts 6.7.1 through 6.7.4 on pages 4.6-87 through 90. The analysis shows that numeric-based criteria for dissolved copper may be exceeded in West County, but could be avoided with mitigation; and that irrigation in the West County will cause significant unavoidable water quality changes within the esteros, part of the National Marine Sanctuary (Impact 6.7.3).

Response to Comment 63-5

Comment Summary: The comment states that the Draft EIR/EIS is inadequate because there is no long term plan for monitoring potential problems resulting from the West County Option.

The Mitigation and Monitoring Program for the Santa Rosa Subregional Long-Term Wastewater Project alternatives, including the West County Reclamation Alternative, is presented on pages 2-1 through 2-144 of the Draft EIR/EIS. If the City adopts the Mitigation and Monitoring Program, it will be legally responsible to abide by the Program. For each mitigation measure (which by design is intended to avoid, minimize, rectify, reduce over time, or compensate for a potential problem), the Program identifies the affected alternatives and/or components, the implementing and monitoring agencies, the duration of the monitoring (in many cases lasting the life of the project), and the validation criteria. The monitoring results are to be documented through completion of Verification reports by the in-field monitor, responsible agency, or construction manager, and completion of quarterly Mitigation Monitoring Checklists by the City of Santa Rosa.

Response to Comment 63-6

Comment Summary: The comment states that the Draft EIR/EIS is inadequate because there is no long term plan for mitigation of any sort for the potential problems resulting from the West County Option.

The Mitigation and Monitoring Program for all Santa Rosa Subregional Long-Term Wastewater Project alternatives, including the West County Reclamation Alternative, is presented on pages 2-1 through 2-144 of the Draft EIR/EIS. The over seventy mitigation measures described include: measures included in the Project; planning measures; construction measures; and operation and maintenance measures. Refer to Response to Comment 63-5 above for further descriptions of the Mitigation and Monitoring Program.

Response to Comment 63-7

Comment Summary: The comment states that the "West County Option" was insufficiently addressed in the Draft EIR/EIS because the citizens who live outside of the City of Santa Rosa are not represented on the City Council.

Political representation of the decision-making body is outside the required scope of an EIR/EIS. California law sets forth the procedures required when one jurisdiction desires to create a project within the lands of another jurisdiction. Further, the County of Sonoma, including the Board of Supervisors, has participated in all phases of this Project; refer to the Responses to Comment Letter 15 from the County of Sonoma.

Response to Comment 63-8

Comment Summary: The comment states that the future impact of the irrigated waste water in the Russian River on a long-term basis is insufficiently addressed.

The alternatives evaluated in the Draft EIR/EIS do not involve irrigation in the Russian River watershed, except for acreage in the Sebastopol area. Measures 2.2.1: Irrigation and Conservation Management Programs and 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff on pages 2-21 and 2-23 were included in the Project to avoid significant irrigation impacts on surface waters, and no significant impacts were identified in the Sebastopol area or in the Russian River (refer to Impacts 6.7.1 through 6.7.4).

Response to Comment 63-9

Comment Summary: This comment states that the Draft EIR/EIS is inadequate because long term buildup of heavy metals and toxic substances in the water and soil are insufficiently addressed for the Russian River option.

Alternatives 5A and 5B, Russian River Discharge, do not include agricultural irrigation. Water Quality impacts of direct discharge are evaluated in Impacts 6.9.1 through 6.9.4 on pages 4.6-109 through 4.6-130. Significant, but mitigable impacts of discharge to the Laguna or Russian River were found regarding cyanide, effects on the Regional Board's Waste Reduction Strategy (both for Total Nitrogen and Ammonia Nitrogen), and toxicity. Significant, unavoidable impacts were found regarding conductivity, dissolved oxygen, biostimulatory substances, and turbidity (with regard to the Contingency Plan only). The potential for metals impacts from River discharge was evaluated in Appendices I-13 (Sediment Quality Characterization and Impact Assessment), K-4 (Ecological Risk Assessment), L-6 (Evaluation of Bioaccumulation in Organisms Exposed to Reclaimed Water From the Santa Rosa Subregional System), and Appendix I-16 (Water Quality Impacts Analysis Report Volume I - Text).

Impacts of discharge on long-term buildup of heavy metals and toxic substances in soil are discussed in Impact 2.9.4 on page 4.2-27; no significant impacts were found.

Response to Comment 63-10

Comment Summary: The comment states that the Draft EIR/EIS is inadequate because there is no long term plan for monitoring potential problems resulting from the Russian River Option.

Refer to Response to Comment 63-5 above.

Response to Comment 63-11

Comment Summary: The comment states that the Draft EIR/EIS is inadequate because there is no long term plan for mitigation of any sort for the potential problems resulting from the Russian River Option.

Refer to Response to Comment 63-6 above.

Response to Comment 63-12

Comment Summary: The comment indicates that water and soil samples are going to be collected and analyzed at a laboratory to provide a basis for measuring future changes and a foundation for a future lawsuit, if necessary.

Although the comment provides a statement of intention, it does not comment specifically on the adequacy of the analysis or information provided in the Draft EIR/EIS; the EIR/EIS authors are unable to respond further.