

**COMMENT LETTER 75 - WILLIAM & FRANCES BERETTA (OCTOBER 2, 1996),  
RECEIVED OCTOBER 4, 1996**

**Response to Comment 75-1**

*Comment Summary: The comment states that the pending outcome of the Subregional system project will determine the health and integrity of the Russian River, the fate of the estuaries at the Esteros de San Antonio and Esteros Americano, and the footprint of future urban sprawl or wastewater dam sites across the county's remaining open spaces. The comment states that increasing the overall assessed valuation of developable real estate in Sonoma County is the main focus of the urban development community. Four things are primary to the urban development community: available land to subdivide; plentiful water supply; roads; and expanded wastewater disposal. The comment states finally that private profits will be higher if the public foots the bill for the urban infrastructure.*

The Draft EIR/EIS has been structured to provide decision makers with the necessary information about the environmental effects of the Project alternatives, so they can make an informed decision about project selection. Section 4.18 of the Draft EIR/EIS discusses how the Project would be funded with a combination of service charges and demand fees.

**Response to Comment 75-2**

*Comment Summary: The comment states that the City of Santa Rosa got off to a bad start with the west county ranchers in preparing the Draft EIR/EIS by serving property owners with a court order demanding access to their properties to conduct invasive geologic testing.*

Preparation of a complete and technically accurate environmental document required that on-site surveys be conducted at each of the potential reservoir sites.

**Response to Comment 75-3**

*Comment Summary: The comment characterizes 19,400 acres of privately held agricultural land as lying within a footprint of potential condemnation for pipeline corridors, dam sites, pump stations and irrigation projects, and indicates that ranchers in the West County are organizing in opposition.*

The comment is incorrect in its characterization of 19,400 acres of land as being subject to potential condemnation for the project. The comment has apparently included 18,000 of land evaluated for potential agricultural irrigation as being subject to condemnation. With respect to irrigation of agricultural lands, the City does not intend to acquire land for the purpose of agricultural irrigation, and acquisition of land for such purpose, either by purchase or condemnation, is not identified as a Project activity.

With respect to acquisition of property for reservoirs, pipelines, pump stations and their ancillary facilities such as power line rights-of-way and access roads, the Draft EIR/EIS, in Section 3.3, (pages 3.3-5, 3.3-19 and 3.3-25) states that the City of Santa Rosa would attempt to purchase only that portion of a parcel required for construction of such facilities; that if required to purchase the entire parcel, the City would maintain the land use existing on the remainder portion at the time of acquisition, unless subsequent environmental documentation is prepared by the City; and that, if necessary, the City would use its power of condemnation to acquire property or easements necessary to construct such Project facilities.

#### **Response to Comment 75-4**

*Comment Summary: The comment refers to a proposed box culvert at a South County reservoir site, describing its purpose as trying to prevent runoff from entering downstream creeks and characterizing it as a mitigation strategy which represents the consultant's wild creativity.*

In fact, the facility in question, located at the proposed Tolay reservoir site, is not intended to prevent runoff from entering downstream creeks, but just the opposite, to allow natural runoff to enter the downstream creeks. As stated in Section 3.3 of the draft EIR/EIS (page 3.3-22), this limits consumption of the reservoir storage volume by runoff and removes runoff which would otherwise collect behind the backdam proposed for this reservoir. The provision of such runoff diversions structures is not, as characterized in the comment, a "mitigation strategy", but an integral part of the reservoir design, and is standard engineering practice in such situations.

#### **Response to Comment 75-5**

*Comment Summary: The comment states that any change in water quality in the esteros would be a significant impact and that berms would be required to control runoff from agricultural fields.*

The criterion for impacts to the esteros states that any change to water quality would be significant. (Refer to the discussion of Special Sites Criteria on page 4.6-66.) Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff, does not require construction of berms (refer to pages 2-23 through 2-25). Individual site Irrigation and Conservation Management Programs may determine that berms are needed in some areas, but use of setbacks and proper irrigation management procedures would be sufficient to control runoff in many locations.

#### **Response to Comment 75-6**

*Comment Summary: The comment expresses the opinion that the City's program for managing irrigation would intrude on agricultural operations.*

It is correct that significant restrictions would have to be placed on irrigation to ensure proper management and avoidance of potential impacts. These restrictions would be a part of irrigation contracts that would be signed by those who wanted to receive reclaimed water for irrigation. The City will be responsible for monitoring compliance and ensuring that irrigation is managed properly.

