

**COMMENT LETTER 79 - RUDSON L.P. SHURLIFF (OCTOBER 1, 1996),
RECEIVED OCTOBER 4, 1996**

Response to Comment 79-1

Comment Summary: The comment states that the Draft EIR/EIS examines approximately 19,400 acres of agricultural property in West County for five storage reservoir sites, pipeline corridors, pump stations, and irrigation projects and that the threat of condemnation hangs over many families that own that land. The comment states that the 19,400 acres is more than half the size of Petaluma or the City of Santa Rosa.

On page 3.3-36 of the Draft EIR/EIS, it states that about 19,400 acres of privately owned property in the West County area have been evaluated for potential agricultural irrigation. It is assumed that this is the acreage figure to which the comment refers. These 19,400 acres will not be condemned but are being considered for irrigation purposes.

Response to Comment 79-2

Comment Summary: The comment states that the environmental costs associated with implementation of the project, in many cases involving the loss of entire ecosystems, will be borne by the environment.

The Draft EIR/EIS does not identify any ecosystem or even a major portion of an ecosystem that will be entirely lost as a result of the Project. The comment does not provide any specific information to suggest that the analysis in the Draft EIR/EIS is inaccurate or omits analysis of impacts. Therefore, a more specific response cannot be provided.

Response to Comment 79-3

Comment Summary: The comment concerns groundwater quality in shallow wells in West Marin.

Analyses presented in the Draft EIR/EIS indicate that nitrate is the only water quality constituent of concern in the reclaimed water. As indicated in the Draft EIR/EIS on page 4.5-52, less than significant groundwater quality impacts will result from agricultural irrigation with reclaimed water. Reservoir operation will result in potentially significant groundwater quality impacts. These impacts are discussed on page 4.5-32 of the Draft EIR/EIS and mitigation measures are proposed. Impacts to shallow groundwater in the West County are specifically addressed on page 5-17 in Appendix H-1 (Hydrogeology of Storage/Reuse Areas and Evaluation of Potential Impacts to Groundwater) in the Draft EIR/EIS.

Response to Comment 79-4

Comment Summary: The comment states that the Draft EIR/EIS does not have meaningful perspectives on the “Real World” and the ecological relationships which surround us and our special place on earth.

The Draft EIR/EIS contains descriptions of both terrestrial and aquatic ecology of the Project area, and extensive evaluation of potential impacts on plant communities and wildlife habitats. Refer to Sections 4.8 and 4.9 of the Draft EIR/EIS. Both sections include results of an ecological risk assessment, which evaluates the potential for reclaimed water to move through the environment and affect ecological resources. The EIR/EIS authors believe that this provides an appropriate analysis of ecological impacts of the Project. Because no specific evidence of any inadequacy, and because no recommendations have been included in the comment, the EIR/EIS authors are not able to respond more specifically.

Response to Comment 79-5

Comment Summary: The comment states that dam sites and irrigation in West Marin are unacceptable.

None of the potential reservoir sites is within Marin County; all are located within Sonoma County. There are some potential irrigation areas in West Marin. The Draft EIR/EIS recognizes that less water per acre could be applied in the irrigation areas in the West County project, and proposes mitigation measures to ensure that irrigation is managed properly.