

**COMMENT LETTER 83 - STEGEMAN AND ASSOCIATES (OCTOBER 7, 1996),  
RECEIVED OCTOBER 7, 1996**

**Response to Comment 83-1**

*Comment Summary: The comment refers to potential groundwater quality impacts to the Sebastopol municipal well field as a result of Laguna discharge.*

Refer to Response to Comment 17-3.

**Response to Comment 83-2**

*Comment Summary: The comment requests additional studies to evaluate the Sebastopol study*

The Sebastopol study was evaluated as part of the preparation of the Draft EIR/EIS. No additional studies are necessary because the existing study information substantially demonstrates that the Sebastopol wells will not be significantly affected by Laguna discharges. Refer to Response to Comment 17-3.

**Response to Comment 83-3**

*Comment Summary: The comment states that the Draft EIR/EIS needs to reflect the potential for groundwater impacts for Alternative 5B (Laguna Discharge) as significant, unless a mitigation level is provided comparable to those provided in the Draft EIR/EIS for Alternatives 2 and 3. The comment states that specifically, an alternative potable water source should be offered to the City of Sebastopol consistent with that in Mitigation Measure 2.3.12.*

No significant groundwater impacts for Alternative 5B will result and, therefore, no mitigation measure is needed. Refer to Response to Comment 17-3.

**Response to Comment 83-4**

*Comment Summary: The comment states that “the DEIR is inadequate in that it states acknowledges that no cumulative impact analysis was done for the Alternative 5B in other than the “normal” hydrologic year.” The comment states that this is inappropriate since a 20% discharge scenario is most likely to exercised in the dry hydrologic year.*

Refer to Response to Comment 8-34

**Response to Comment 83-5**

*Comment Summary: The comment states that the level of analysis for cumulative impacts is unacceptable and that there is a lack of basis for concluding that the results from a normal year cumulative analysis can be extended into conclusions regarding a dry year.*

The Draft EIR/EIS specifically acknowledges that conclusions from a normal year cannot be fully extrapolated to a dry year, as indicated by the quote from the Draft EIR/EIS provided in the comment. Refer to Response to Comment 8-34.

### **Response to Comment 83-6**

*Comment Summary: The comment states that the Draft EIR/EIS needs to specifically address cumulative impacts for surface water quality under dry and wet year scenarios.*

Refer to Response to Comment 8-34

### **Response to Comment 83-7**

*Comment Summary: The comment states that the Draft EIR/EIS needs to specifically address possible project specific and cumulative impacts associated with varying implementation of the nutrient loading strategy under different weather scenarios.*

As described in Response to Comment 8-34, the EIR/EIS authors consider the assumption that cumulative projects will be implemented is sufficiently speculative that compounding the uncertainty of the cumulative analysis with cumulative analyses of non-normal weather assumptions is inappropriate and not called for by CEQA or NEPA. Comment 83-7 requests that varying degrees of cumulative project implementation also be evaluated. The EIR/EIS authors also consider this evaluation to be too speculative and not called for by CEQA or NEPA.