

**PUBLIC HEARING COMMENT 230 - KIT MARIAH, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 230-195

Comment Summary: The comment expresses concern about swimming in the Russian River.

Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water) evaluates risks for swimmers. The results are summarized in Section 4.7 of the Draft EIR/EIS. As discussed starting on page 4.7-61, significant impacts to swimmers are not expected.

Response to Comment 230-196

Comment Summary: The comment advocates zero discharge.

Refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge.

PUBLIC HEARING COMMENT 231 - LAURENCE STERLING, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 231-197

Comment Summary: The comment requests consideration of small on-farm storage reservoirs.

Refer to Master Response 14, located in Section 6.2 of this document, regarding use of small storage reservoirs.

**PUBLIC HEARING COMMENT 232 - JUDY JAMES, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 232-198

Comment Summary: The comment states that the Sonoma County Farm Bureau supports the development of reclaimed water for a supplemental supply. However, the farm bureau opposes the use of condemnation to achieve this purpose.

One of the Project objectives is to “Maximize reclamation, recycling, and reuse of advanced treated wastewater to the greatest extent feasible” (see page 1-3 of the Draft EIR/EIS). The City will prefer not to use condemnation, but it may not be possible to build a large reservoir without condemnation.

Response to Comment 232-199

Comment Summary: The comment advocates a phased project using small reservoir sites.

Refer to Master Response 14 regarding phasing and small reservoir sites, located in Section 6.2 of this document.

Response to Comment 232-200

Comment Summary: The comment states that in an economically driven market there will be a demand for reclaimed water and it will ensure the long-term viability of the reclaimed water system.

Section 4.18 of the Draft EIR/EIS has provided an analysis of the potential economic benefits of providing reclaimed water for agriculture, beginning on page 4.18-38. The City will consider the possibility of charging for water, but no pricing structure has yet been decided.

Response to Comment 232-201

Comment Summary: The comment states that state policy is that public improvements such as treatment and storage ponds be located in non-prime agricultural land that is not in Williamson Act contracts.

Although reservoir sites do include lands under Williamson Act contract, none of the proposed reservoir sites contains prime farmland (refer to Table 4.2-6 on page 4.2-12 of the Draft EIR/EIS).

Response to Comment 232-202

Comment Summary: The comment suggests a solution regarding voluntary on-farm storage.

Please refer to Master Response 14, located in Section 6.2 of this document, regarding use of small on-farm reservoirs.

PUBLIC HEARING COMMENT 233 - JEAN MARIE FOSTER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 233-203

Comment Summary: The comment concurs with the Draft EIR/EIS conclusion that Alternative 5B, Laguna Discharge, is environmentally superior.

The EIR/EIS authors acknowledge the comment's agreement with the Draft EIR/EIS.

Response to Comment 233-204

Comment Summary: The comment states that the West County alternative has met with so much opposition from the very farmers it was intended to serve that it can't be worthy of consideration.

Refer to Master Response 6, located in Section 6.2 of this document, which deals with feasibility of the West County Alternative.

Response to Comment 233-205

Comment Summary: The comment states that the Geysers Recharge Alternative has received no support from the utility companies operating the plant and is, therefore, not worthy of consideration.

UNOCAL, PG&E, and the Calpine Corporation have expressed interest in the Geysers Alternative, and have provided important information for the background studies and to the Draft EIR/EIS authors. Comment letters from each of the companies have been received. All Project alternatives are considered despite the level of support from either private or public companies or agencies.

Response to Comment 233-206

Comment Summary: The comment indicates that the South County Reclamation Alternative has received a great deal of support from environmentalists, and states an opinion that this alternative is fatally flawed. The comment cites a cost for the alternative of \$350 million, and states that rates would increase over their current levels by \$11 to \$14 per household per member per month. The comment also states that hookup fees will be \$7,300 to \$9,400 and that the sewage rates and hookup fees will be some of the highest in the nation.

Table 3.4-1 in Section 3.4 of the Draft EIR/EIS (page 3.4-2), indicates that the South County Reclamation Alternative has an estimated cost of between \$312 million and \$376 million, depending upon the subalternative. The Draft EIR/EIS in Section 4.18 (pages 4.18-32 and 4.18-34) indicates that the additional service charge for the South County Alternative at buildout will be between \$33 and \$43 per month per household, depending

upon the subalternative, and concludes that this will be a significant impact. Also in Section 4.18 (pages 4.18-36 and 4.18-37) the discussion of demand fees (hookup fees) estimates that the additional fee for the South County Alternative in 2005 will be between \$7,300 and \$9,400 as stated in the comment. This discussion also concludes that the additional fees will result in a decrease in land value in the service area.

Response to Comment 233-207

Comment Summary: The comment states that expenditures for the South County Reclamation Alternative, as cited in Comment 233-206, are justified by a cost benefit analysis that heavily weighs the valuable contribution that reclaimed water can make to agricultural jobs and increased farm value, and indicates that there is a problem with who is paying and who is benefiting. The comment also states that it will cost \$87,000 for each of the 4,000 jobs created and asserts that half of the jobs will be low paying farm jobs and the other half installing and maintaining the irrigation program.

The cost-benefit analysis in the Draft EIR/EIS, as explained in Section 4.18 (pages 4.18-28 and 4.18-29), uses an input-output model, which includes a multiplier analysis which estimates the changes in the overall economy from increase in agricultural production; investment in Project facilities; and ongoing operation and maintenance expenditures. The model also takes into account the reduction in expenditures due to the increases in service charges, and thereby accounts for both the economic costs as well as the benefits of the Project. Section 4.18 (page 4.18-51) also clearly indicates that the benefits and costs do not accrue to the same population groups, with the benefits primarily accruing to farmers while the costs will affect the ratepayers in the service area.

With a Project cost of \$350 million, as is cited in Comment 233-206, the ratio of cost to jobs created will be approximately \$87,000 as stated in the comment. However, the comment is incorrect in asserting that the jobs will consist only of farm jobs or installing and maintaining the irrigation program. As stated in the discussion of the multiplier analysis in Section 4.18 (page 4.18-29), new jobs are created in construction, which in turn create jobs in other sectors, including retail trade and services. The direct jobs created, which are about one half of the total, will result from direct expenditure for construction, and operation of the Project. The indirect jobs, which constitute the other half, will be in businesses which are supported by the direct expenditures.

Response to Comment 233-208

Comment Summary: The comment asks if reclaimed water is truly a valuable resource, wouldn't the beneficiaries be funding the program. The comment also asserts that irrigators do not expect to so much as buy their own sprinklers.

In order to provide an analysis of the maximum level of economic impacts on the ratepayers in the service area, the analysis in the Draft EIR/EIS takes a conservative position with regard to recovering Project costs, and does not include any offsetting revenue from the use of reclaimed water. Charges which may be imposed for the use of

reclaimed water as the Project is implemented will therefore reduce the impact on service charges to the ratepayers.

The comment is incorrect concerning the costs to the irrigators. The City of Santa Rosa does not intend to install, operate or manage individual irrigation systems. While the City may choose to provide some assistance to individual users to aid them in stating up irrigation, the City will negotiate the specifics of this as part of the contract with each user. Ultimately, irrigation systems will be the responsibility of the end users.

Response to Comment 233-209

Comment Summary: With respect to the Laguna Discharge Alternative, the comment indicates that a \$49 million cost for the alternative would require only a 25 cent increase per household member per month, and that hookup fees would be reduced from their current levels by \$2,400. The comment also states that this alternative fails the cost benefit analyze test because it doesn't create any jobs, but that it doesn't cost much not to create these jobs. The comment also asserts that the advantage of leaving this money in the local community to support local businesses is not part of the analysis.

Table 3.4-1 in Section 3.4 of the Draft EIR/EIS lists the estimated cost of Alternative 5B (Laguna Discharge) as \$46 million. According to the analysis of impact on service charges in Section 4-18 of the Draft EIR/EIS (pages 4.18-32 and 4.18-34), this alternative will result in an increase at buildout of 70 cents per single family residence or equivalent. Table 4.18-15 on page 4.18-36 also indicates that the demand fee (hookup fee) for a single family residence in 2005 will decrease by \$2,400 as stated in the comment. The cost benefit analysis is intended to address the evaluation criterion concerning the Project's net economic effect on the local economy, and the Draft EIR/EIS presents the results of the analysis as information to be considered, without characterizing them as passing or failing a test. Alternative 5B will, as suggested in the comment, leave money in the local economy to support local businesses in comparison to other alternatives. This is illustrated in Table 4.18-18 of the EIR/EIS (page 4.18-49) where Alternative 5B has the lowest economic cost. This is because Alternative 5B has the least increase in service charges. However, even with a relatively low increase in service charges, this alternative will still have a negative cost.

Response to Comment 233-210

Comment Summary: The comment states that the South County Reclamation Alternative carries a heavy ecological toll.

Habitat such as oak woodlands, native grasslands, riparian woodlands and freshwater marsh will potentially be destroyed by flooding associated with wastewater impoundment. Impacts to biological resources and sensitive habitats associated with the South County Reclamation Alternative are discussed on pages 4.9-55 through 4.9-74 of the Draft EIR/EIS.

Response to Comment 233-211

Comment Summary: The comment states that storage reservoirs associated with the South County Reclamation Alternative will cut off natural stream channels.

Downstream flows will be significantly affected, which will impact aquatic habitats downstream of the reservoir. Impacts to stream channels and downstream flows associated with the South County Reclamation Alternative are discussed on page 4.4-25, pages 4.8-84 through 4.8-85, 4.8-91 through 4.8-95 and 4.9-65 through 4.9-73 the Draft EIR/EIS.

Response to Comment 233-212

Comment Summary: The comment states that two special-status species, California red-legged frog and northwestern pond turtle are known to occur at one or more of the proposed South County Reservoir sites.

These species will be impacted by changes to their habitat that will occur as a result of the South County alternative. Impacts to California red-legged frog and northwestern pond turtle associated with the proposed South County Reservoir sites are discussed on pages 4.9-56 through 4.9-58 and pages 4.9-59 through 4.9-62 of the Draft EIR/EIS.

Response to Comment 233-213

Comment Summary: The comment states that the proposed mitigation for these impacts as described in the Draft EIR will require the purchase of another reservoir site for mitigation. This means that two sites would be taken from farmers instead of just one.

The premise upon which the comment is based is incorrect. Although each of the nine proposed reservoir sites is identified as being a potential mitigation opportunity, as stated on page 2-81 of the Draft EIR/EIS, alternative mitigation opportunities are provided in the *Mitigation for Wetlands and Waters of the U.S. for Proposed Reservoir Sites* (Parsons Engineering Science, Inc. 1996b). Final mitigation sites will be chosen upon Project adoption.

Response to Comment 233-214

Comment Summary: The comment states that winter discharge to the Laguna would not have adverse impacts on native vegetation, endangered species, or public health.

The comment agrees with the conclusions of the Draft EIR/EIS.

Response to Comment 233-215

Comment Summary: This comment states that the Laguna is an impaired wetland and an infusion of freshwater would actually be beneficial.

Discharge to the Laguna is predicted to cause both beneficial and adverse impacts (many of which can be mitigated) to the Laguna. The impacts from direct discharge to the Laguna are addressed in Appendix I-16 (Water Quality Impact Analysis Report Volume I - Text) of the Draft EIR/EIS.

Response to Comment 233-216

Comment Summary: The comment states that 20 percent winter discharge would only occur during extreme conditions, and 95 percent of the time the discharge rate would be 4 percent.

Although the comment is correct that 20 percent discharge occurs very infrequently (about 97 percent of the time discharge is less than 20 percent), the discharge is less than 4 percent for only about 60 percent of the time. The monthly average discharge for the 20 percent alternative is 4 percent. As discussed in Section 4.2 in Appendix I-16 (Water Quality Impact Analysis Report Volume I - Text) of the Draft EIR/EIS, the 20 percent design discharge with contingency discharge is actually the worst case scenario.

Response to Comment 233-217

Comment Summary: The comment indicates that there is irony in that an expensive infrastructure project could encourage growth. If a reuse project with high infrastructure costs is adopted and the cities fail to meet their projected growth projections the cost per capita of the project goes up. However, increased development could cause per capita costs to go down. The Discharge alternative works in the opposite way. Expensive additional storage will only be needed when cities exceed their growth projections.

Growth inducing impacts are evaluated in Section 5.3 of the Draft EIR/EIS, which concludes that the Project alternatives accommodate rather than induce growth.

Response to Comment 233-218

Comment Summary: The comment states that high sewage rates could eliminate low income housing. The comment also states that the Sonoma County Taxpayers Association will continue to monitor this project for the rate payers.

Section 4.18 of the Draft EIR/EIS (page 4.18-51) concludes that the Project will not disproportionately affect low income communities. As discussed in Section 4-18 (page 4.18-38), the increased demand fees (hookup fees) are expected to result in a decrease in land prices in the area, in order to absorb the increased demand fees in a competitive environment for real estate development, and there could be some changes in the size of housing units or pace of development, but the overall cost of housing will not be affected. Because the comment does not specifically state how the increases in sewage rates will affect low income housing, no further response can be provided to that part of the comment.

**PUBLIC HEARING COMMENT 234 - BECKY LEPORI, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 234-219

Comment Summary: The comment suggests that the information on which the groundwater setting section is based is not current.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 111-1.

Response to Comment 234-220

Comment Summary: The comment asks if commercial fisherman will see signs posted near areas using reclaimed wastewater.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 111-2.

Response to Comment 234-221

Comment Summary: This comment raises a number of questions including concerns about groundwater data, difficulty in getting access to the document, groundwater volumes and impacts to artesian wells, and total volume of groundwater in the West County hills.

This comment was also submitted in writing. Refer to Responses to Comments 111-3 through 111-6. The portion of the comment concerning the volume of water stored in the groundwater is addressed in Response to Comment 111-6. The amount of groundwater that will be added by the Project is addressed in Response to Comment 5-57. The portion of the comment pertaining to difficulty of access to a copy of the Draft EIR/EIS is responded to in Master Response 3, located in Section 6.2 of this document. The portion of the comment about groundwater volumes and impacts to artesian wells is addressed in Response to Comment 111-5.

**PUBLIC HEARING COMMENT 235 - MARTIN GRIFFIN, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 235-222

Comment Summary: The comment states that the Russian River has the highest rate of repetitive flooding of any river west of the Mississippi River, that this is caused by “the policies of the county and of the Santa Rosa sanitary district and other districts who channelize their creeks,” and that this “is the main thing that’s been overlooked in the EIR/EIS.”

The Santa Rosa Subregional Wastewater Reclamation System does not channelize creeks, and the Project alternatives evaluated in the EIR/EIS do not involve channelizing creeks. Impacts of the Project on Russian River flooding are evaluated in the Draft EIR/EIS in Appendix G-1 (Potential Flood Impacts in the Laguna de Santa Rosa Floodplain and Russian River Floodplain) and Section 4.4. No impacts of flooding were found, except for Impact 4.4C, for which mitigation is provided. Refer to Response to Comment 85-81.

Response to Comment 235-223

Comment Summary: The comment indicates that the cities along the US Highway 101 corridor are benefiting from exploitation of the Russian River, but at the expense of the communities located along the river. The comment also states that the Sonoma County Water Agency just released its EIR addressing increased diversion from the Russian River and that the analysis from this latter EIR should have been coordinated with the analysis in the Draft EIR/EIS for the wastewater project.

The Draft EIR/EIS has considered cumulative impacts to the Russian River in two ways: 1) the setting considers existing conditions on the River, which are affected by existing gravel mining, wastewater discharges and development; and 2) future development, including future increases in wastewater discharge is considered in the cumulative analysis. Refer to the discussion of cumulative impacts in Section 4.6 starting on page 4.6-33, and in Section 4.3 starting on page 4.3-44.

In regard to increased future diversions from the Russian River, analysis associated with these proposed diversions has been addressed on page 4.6-133 of the Draft EIR/EIS. In summary, this text states “Projects involving diversions (reduction in Russian River flow) located above the Sonoma County Water Agency intakes are already factored into the analysis of design discharge, because the River flows used to estimate Subregional System Project effects are based on Sonoma County Water Agency estimates of future diversions.” In addition, page 3.1-12 of the Draft EIR/EIS states “The Monthly Water Balance Model for reclamation system operations is based on monthly Russian River flow estimates generated by the Sonoma County Water Agency Russian River Flow Model. The Water Agency’s model generated river flow estimates for the Hacienda Bridge (USGS) gauging station between 1923 and 1992. The Water Agency’s model is

based on water use conditions projected for the year 2010.” The analysis provided in the Draft EIR/EIS therefore does address the proposed future diversions of water by the Sonoma County Water Agency.

Response to Comment 235-224

Comment Summary: The comment states that a “comprehensive river management plan for the Russian River” is needed.

Refer to Response to Comment 235-222.

**PUBLIC HEARING COMMENT 236 - JACK MACY, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 236-225

Comment Summary: The comment provides a discussion that identifies that the last EIR that was prepared for this project was ruled inadequate by the courts, that review of that decision and the current Draft EIR/EIS indicates that the key issues associated with the decision have been addressed by the current document and environmental process, that the current Draft EIR/EIS evaluates a reasonable range of alternatives at a project level of detail, that the Draft EIR/EIS addresses each of the issues that was raised during the scoping process, that the document adequately analyzes the significant and potentially significant impacts of each of the alternatives, and that the document presents feasible mitigation for the identified impacts. Lastly, the comment states an opinion that the Final EIR/EIS will be defensible when certified and will be an adequate document to assist in the selection process.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers.

**PUBLIC HEARING COMMENT 237 - JOI LOSEE, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 237-226

Comment Summary: The comment indicates that the aquifer storage and recovery component should have been evaluated in the Draft EIR/EIS.

Refer to Response to Comment 39-1 concerning aquifer storage and recovery.

Response to Comment 237-227

Comment Summary: The comment indicates that the Draft EIR/EIS did not discuss the relationship between surface water, groundwater, and the Russian River water.

These relationships are discussed in Sections 4.5 and 4.6 of the Draft EIR/EIS. Water quality issues related to both surface water and groundwater are also discussed in these sections. The Draft EIR/EIS does not, however, evaluate impacts of the existing system, which were evaluated in a previous environmental document. (Environmental Impact report for alternative Wastewater Management Projects for the City of Santa Rosa, Brown and Caldwell 1973).

Response to Comment 237-228

Comment Summary: The comment states that groundwater recharge areas are not described in the Draft EIR/EIS. The comment also expresses concerns about drinking water quality.

Groundwater recharge in Sonoma County is discussed beginning on page 4.5-5 of the Draft EIR/EIS. Groundwater quality and Russian River water quality issues are discussed in Sections 4.5 and 4.6 of the Draft EIR/EIS. The potential health affects of constituents of reclaimed water are discussed in Section 4.7 of the Draft EIR/EIS. Table 4.6-1 on page 4.6-6 of the Draft EIR/EIS lists constituents of reclaimed water.

Response to Comment 237-229

Comment Summary: The comment suggests that the project could result in increased bromine in agricultural runoff because grapes are treated with bromine.

The EIR/EIS authors are not aware of bromine being used to treat grapes. The comment may be referring to soil fumigation using methyl bromide gas. Most methyl bromide is volatilized during soil treatment. Measure 2.2.6: Agrochemical and Fertilizer Best Management Practices, states that "The City of Santa Rosa will require that individual Irrigation Conservation and Management Programs incorporate State Water Resources Control Board Technical Advisory Committee management recommendations for Irrigated Agriculture and Pesticides to minimize offsite movement of pesticides."

Specific provisions are presented on page 2-34 of the Draft EIR/EIS. With implementation of this measure problems with pesticides in runoff are not expected to occur.

Response to Comment 237-230

Comment Summary: This comment asks if bromine used by the wine industry is entering the Russian River.

Analysis for bromated compounds in the Russian River have been conducted and these compounds have been detected. Refer to Appendix I-6 (Russian River Water Quality Monitoring Results) of the Draft EIR/EIS.

Response to Comment 237-231

Comment Summary: The comment asks if bromine contaminated water could enter the aquifer and affect drinking water wells as a result of the project.

As indicated in Response to Comment 237-229, measures are in place to prevent off-site movement of pesticides and other agricultural chemicals. Contamination of groundwater is not expected.

Response to Comment 237-232

Comment Summary: The comment states that the EIR/EIS only reports "carcinogens that are above the reported limits" and requests information on carcinogens that may occur in concentrations below the reported limit.

It is not clear to what section of the Draft EIR/EIS the comment refers. Table 4.6-1 on page 4.6-6 provides data on detectable chemical constituents of reclaimed water. Appendix H-2 (Reclaimed Water Quality) provides data on chemical analyses of reclaimed water, including a listing of those constituents that were analyzed, but found to be below detection limits. As shown there, many chemicals for which analyses were conducted were not present in detectable amounts. Health effects of chemicals that were not detected are not discussed in the Draft EIR/EIS because there is no reason to assume that they are present in reclaimed water.

PUBLIC HEARING COMMENT 238 - BOB OTTENSMEYER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 238-233

Comment Summary: The comment states its support of the Draft EIR/EIS.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers.

Response to Comment 238-234

Comment Summary: The comment asks who pays for reuse, the user or the rate payer.

The economic analysis in the Draft EIR/EIS is based upon the full cost of the Project being borne by the rate payers in the service area. In order to provide an analysis of the maximum level of economic impacts on the rate payers in the service area, the analysis in the Draft EIR/EIS takes a conservative position with regard to recovering Project costs, and does not include any offsetting revenue from the use of reclaimed water. Charges which may be imposed for the use of reclaimed water as the Project is implemented will therefore reduce the impact on service charges to the rate payers.

Response to Comment 238-235

Comment Summary: The comment states that returning reclaimed water to the Russian River is recycling.

The EIR/EIS authors concur with the comment.

Response to Comment 238-236

Comment Summary: The comment states that economic impacts of alternatives should be eliminated, if possible.

None of the Project alternatives is without cost to the rate payer.

PUBLIC HEARING COMMENT 239 - FRANCES SHURLIFF, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 239-237

Comment Summary: The comment states that the Draft EIR/EIS contains misinformation and disinformation and can affect the future of Sonoma County dramatically. The comment also asserts that the five storage reservoir sites would occur on the remaining open spaces and that 19,400 acres of farm land can be condemned.

Because this comment does not provide specific information about the alleged misinformation and disinformation within the Draft EIR/EIS a specific response to this comment is not possible. Specific concerns were expressed in subsequent comments and each comment is addressed specifically in the Responses to Comments below. The West County Alternative does not include construction of five dams; only one of the alternative sites will be needed. Condemnation of irrigation lands is not proposed. Refer to Response to Comment 79-1 in regards to the assumption of condemnation of 19,400 acres of farm land.

Response to Comment 239-238

Comment Summary: The comment asks whether impacts to groundwater would result in condemnation of land at 2331 Chileno Valley Road, and whether well water would be unusable.

The EIR/EIS authors cannot determine the precise location of the referenced wells. However, properties on Chileno Valley Road are not close enough to any of the reservoir sites to be affected by reclaimed water from reservoirs. Table 4.5-6 on page 4.5-30 in the Draft EIR/EIS provides travel times for reclaimed water moving from each potential reservoir site to the nearest domestic well. Irrigation is not expected to contaminate wells. Please refer to Response to Comment 79-3 for additional information.

Response to Comment 239-239

Comment Summary: The comment states that taking water from one site and disposing of it at another site will impact biological resources by upsetting the ecological balance at the deposition site.

There will be impacts associated with the discharge of water into a disposal site. Impacts to biological resources associated with wastewater distribution and storage are discussed in Sections 4.8 and 4.9 of the Draft EIR/EIS.

Response to Comment 239-240

Comment Summary: The comment states that "high tech" crops are not viable in West County because they are not being grown there now, and cites past problems with growing potatoes.

Analysis presented in Appendix E-3 (Cropping Scenarios for the West County and South County Reclamation Alternatives), and in Section 4.19 of the Draft EIR/EIS, has shown that certain "high tech" crops could be grown successfully if water were available, and if suitable measures for controlling runoff and erosion were implemented. Because the comment provides no specific reasons why specific crops will not be viable, it is not possible to provide a more detailed response.

Response to Comment 239-241

Comment Summary: The comment expresses the opinion that people will be displaced and their land will be condemned without adequate compensation because of the Project, infringing on their rights as human beings.

Condemnation is not proposed for irrigation land, but may be necessary for a reservoir site. The City would, however, prefer to purchase land required for Project implementation from a willing seller. Should condemnation be required, land owners will be compensated. Refer to Measures 2.2.27: Uniform Relocation Assistance on page 2-60 of the Draft EIR/EIS, for a discussion of the compensation and assistance afforded for any property that must be acquired.

Response to Comment 239-242

Comment Summary: The comment asks where is the list of the farmers or grape growers who want reclaimed water.

No such list was prepared as part of this EIR/EIS and therefore no list can be provided. Refer also to Master Response 6, located in Section 6.2 of this document.

Response to Comment 239-243

Comment Summary: The comment expresses concern about where excess water goes, and what the impacts are.

The EIR/EIS authors assume that the comment is referring to impacts of agricultural runoff. Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff, on page 2-23 of the Draft EIR/EIS provides measures to ensure that "lands irrigated with reclaimed water are managed such that surface runoff of reclaimed water to adjacent waterways does not occur; and so that the percolation of applied reclaimed water through the root zone is minimized". With appropriate management it is not expected that either irrigated areas or adjacent properties will be adversely affected.

Response to Comment 239-244

Comment Summary: The comment states that the wastewater will ruin the ecological balance.

Refer to Response to Comment 239-239.

Response to Comment 239-245

Comment Summary: The comment asks that the City not "ruin" their water, and expresses concern about impacts to septic systems.

Refer to Response to Comment 239-238. Mitigation measures are included in the Draft EIR/EIS to address impacts to wells or septic systems. Refer to Measure 2.3.12: Provide Replacement Water Supply for Affected Wells on page 2-85, and Measure 2.5.9: Implement Septic System Monitoring and Replacement Program on page 2-136. The City will be responsible for ensuring that properties adjacent to reservoirs have adequate water supply and septic systems.

**PUBLIC HEARING COMMENT 240 - BOB SMITHFIELD, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 240-246

Comment Summary: The comment refers to the use of the term “estero” when identifying the Estero Americano and Estero de San Antonio. It is felt that the term may not convey the functional ecological meaning of “estuary” to the public. In addition, the comment suggests that in order to adequately inform and facilitate the involvement of the public and decision-makers, the phrase “the estuary” should precede Estero Americano and Estero de San Antonio. Finally, the comment suggests that the term “estuary” or its plural replace every occurrence of “estero” (or its plural) throughout the Draft EIR/EIS.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-1.

Response to Comment 240-247

Comment Summary: The comment expresses the opinion that concerns regarding noise raised by the public during the Public Roundtables for the Preliminary Draft EIR should have been reported in the Draft EIR/EIS.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-2.

Response to Comment 240-248

Comment Summary: The comment concerns the ICMPs and the Sensitive Biological Resources Conservation Program and Revegetation Program, and potential future changes in political and economic circumstances that might jeopardize the funding for these programs. It is felt that the Draft EIR/EIS should describe how the impairment of these programs is to be avoided or remedied to mitigate impacts.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-3.

Response to Comment 240-249

Comment Summary: The comment states that there is no mention of continued impacts monitoring of irrigation land lost to attrition, referred to on page 1-21 of the Draft EIR/EIS. The comment suggests that ICMPs and impacts monitoring be developed and operated to include post-attrition practices, monitoring, and reporting.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-4.

Response to Comment 240-250

Comment Summary: The comment indicates that the public and legal tolerance of trace elements loading of soils and soil erosion may not conform to the trace elements loading criteria and erosion T value criteria used in the Draft EIR/EIS.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-8.

Response to Comment 240-251

Comment Summary: The comment suggests that the Draft EIR/EIS contain information on the actual consequences of implementation of irrigation conservation management programs (ICMPs), based on case studies from other parts of the United States.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 49-9.

PUBLIC HEARING COMMENT 241 - CHARLIE CARSON, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 241-252

Comment Summary: The comment asserts that the public has had opportunity to participate in the review of the Draft EIR/EIS and ample time to review the document. The Home Builders Association encourages certification of the document so selection of a project can proceed on a timely basis.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS process has provided appropriate opportunities for review and comment.

**PUBLIC HEARING COMMENT 242 - BOB ANDERSON, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 242-253

Comment Summary: The comment proposes an alternative water balance scheme and suggests project phasing.

The commentor also submitted similar and related comments in writing, and they are responded to in Response to Comment 25-7.

