

**COMMENT LETTER 89 - LEON R. BECK (SEPTEMBER 24, 1996), RECEIVED  
OCTOBER 7, 1996**

**Response to Comment 89-1**

*Comment Summary: The comment states the desire that the esteros be free of any threat of wastewater-caused salinity change.*

Impact 6.5.3 in Section 4.6 of the Draft EIR/EIS (page 4.6-84) describes the impact that the Project will have on estero salinity, and additional information is provided in Section 6 of Appendix I-16 (Water Quality Impact Analysis Report - Volume I). Because the criterion for the esteros deems any change to be significant, the impact on salinity is considered to be significant after mitigation. The City will need to make a finding of overriding considerations regarding this impact, in order to select a West County alternative.

**Response to Comment 89-2**

*Comment Summary: The comment states that any change in esteros water quality will be harmful to aquatic life, and that there is no reasonable mitigation.*

Because the Sanctuary's interpretation of Sanctuary regulations is that any changes in the esteros is prohibited, the Draft EIR/EIS reports that any change to water quality in the esteros is a significant impact, for which no feasible mitigation has been identified. Refer to page 4.6-66 for a discussion of Special Sites Criteria. Also refer to Response to Comment 5-3. However, there is disagreement in the regulatory community about whether all changes will be negative. The Department of Fish and Game has taken the position that some changes in the esteros could be beneficial; refer to Response to Comments 12-13 through 12-16.

**Response to Comment 89-3**

*Comment Summary: The comment concerns a future earthquake on the Bloomfield fault and impacts to the Two Rock (Tresch property) or Bloomfield (Briggs property) reservoirs and the aquatic environment downstream.*

The Bloomfield fault is located about one-half mile southwest of the proposed Two Rock dam and a little over one-half mile north of the proposed Bloomfield dam. As indicated on page 4.3-41 of the Draft EIR/EIS, there is no evidence that the Bloomfield fault has been displaced during the late Quaternary or Holocene Periods, and the fault is not considered to be active. Furthermore, because the fault segment is not lengthy (about nine miles long) the fault is not considered to be capable of generating a large magnitude earthquake. Refer to the discussion on page 3-6 and 3-7 of Appendix F-1 (Geotechnical Assessment of Alternative Reservoir Sites and Pipeline Routes Volume I) of the Draft EIR/EIS.

Refer also to Chapter 4.19, Inundation Due to Dam Failure, which discusses probability of dam failure on pages 4.19-1 through 4.19-3, and potential effects of dam failure on the aquatic environment on page 4.19-7.

#### **Response to Comment 89-4**

*Comment Summary: The comment refers to inadequate geotechnical studies for dam construction.*

An appropriate level of geotechnical investigation, performed according to industry standards, was performed for each proposed reservoir site as part of this Draft EIR/EIS. The results of those studies are presented in Appendix F-1 (Geotechnical Assessment of Alternative Reservoir Sites and Pipeline Routes Volume I) of the Draft EIR/EIS.

#### **Response to Comment 89-5**

*Comment Summary: The comment questions the occurrence and depth of stable bedrock at West County reservoir sites. It appears from the description of soils that is presented in the comment that the comment refers to the Two Rock reservoir site.*

The Two Rock reservoir site is underlain primarily by rocks of the Franciscan Formation, which is considered to be the Bedrock unit (the oldest regional hard rock formation) in Sonoma County. Alluvium and weathered bedrock will be removed from the dam and reservoir footprint during reservoir construction. Stable bedrock is expected to be present within a few feet of the ground surface. Regarding the siting of the Two Rock Reservoir near the Bloomfield fault, refer to Response to Comment 89-3.

#### **Response to Comment 89-6**

*Comment Summary: The comment states that a spillway will be used to release reclaimed water from a dam, reclaimed water will change the composition of the esteros, and the dam must not be built in estero watersheds.*

The Project is designed to avoid any discharge from the dam spillway; however, for dams of the size proposed in West County a spillway is required by the Division of Safety of Dams. Normal operation will not include spillway releases. However, seepage from the reservoir will have effects on the esteros, and Impact 6.5.3 in Section 4.6 of the Draft EIR/EIS (page 4.6-84) recognizes the Project impact on estero water quality. The City will have to make a finding of overriding considerations regarding this impact in order to select a West County alternative. Refer also to Chapter 4.19, Inundation Due to Dam Failure, which discusses probability of dam failure on pages 4.19-1 through 4.19-3, and potential effects of dam failure on the aquatic environment on page 4.19-7.

### **Response to Comment 89-7**

*Comment Summary: The comment states that the Friends of the Esteros did not want to sue the City of Santa Rosa on the last EIR (1990), but they won in court because the EIR was not satisfactory and did not have enough detail. The comment states that a lot of money was spent to make the Draft EIR/EIS defensible in court. The comment finishes with the request to refrain from using “comment noted” when responding to comments.*

In response to the commentor's request both during the public hearing and in this comment letter, the phrase “comment noted” has not been used in responding to comments on this Draft EIR/EIS. The EIR/EIS authors have responded as completely as possible to all comments about the adequacy of the analyses and information in the Draft EIR/EIS.

### **Response to Comment 89-8**

*Comment Summary: The comment refers to comments by others regarding flaws in the Draft EIR/EIS.*

Specific responses are provided in this document to comments made in writing or at the public hearing.

### **Response to Comment 89-9**

*Comment Summary: The comment states that one of the problems with the Draft EIR/EIS would be the selection of a faulty site.*

Refer to Response to Comment 89-3.

### **Response to Comment 89-10**

*Comment Summary: The comment states that one of the problems with the Draft EIR/EIS consists of the alternatives that provide spillways for overflow to the esteros; this overflow is considered to be not acceptable.*

Alternatives 2 and 3 include spillways at each of the storage reservoir sites. Overflow will enter tributaries of Americano Creek or Stemple Creek and mix with creek waters before entering the Estero de Americano or the Estero de San Antonio. Refer to Response to Comment 89-6.

### **Response to Comment 89-11**

*Comment Summary: The comment states that one of the problems with the Draft EIR/EIS consists of inadequate response with “comment noted” to individuals who are trying to help.*

The term “comment noted” is not used in responding to comments for the Draft EIR/EIS. The EIR/EIS authors have responded as completely as possible to comments about the adequacy of the analyses and information in the Draft EIR/EIS. Refer to Response to Comment 89-7.