

**COMMENT LETTER 111 - BECKY LEPORI (SEPTEMBER 24, 1996), RECEIVED
OCTOBER 7, 1996**

Response to Comment 111-1

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

The reports cited in the Draft EIR/EIS on page 4.5-5 are the most current comprehensive reports on groundwater in Sonoma County. They provide an accurate general description of groundwater in the Project vicinity. The analysis of impacts is based on groundwater levels measured in historically wet years (wet years were selected on the basis of precipitation data) to provide a conservative estimate of groundwater levels. Information on groundwater level was collected for at least the last 50 years, which contained periods of flooding similar to those described in the comment. Meteorological and groundwater conditions over the past nine years have not been substantially different than conditions over the prior 50 years.

Response to Comment 111-2

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

The City does not plan on posting signs along the coastline or the Russian River, because such signs will not be required or needed. Use of reclaimed water is regulated by Title 22 of the California Code of Regulations, which does not require such signs.

Response to Comment 111-3

Comment Summary: The comment expresses concern about the volume of water stored in the groundwater and the amount of groundwater that would be added by the project by reservoirs.

Impacts of seepage from reservoirs are evaluated in the Draft EIR/EIS, in Section 4.5, starting on page 4.5-30. Refer to Response to Comment 111-6 regarding groundwater volumes.

Response to Comment 111-4

Comment Summary: The comment states that it was difficult to get access to a copy of the Draft EIR/EIS.

Refer to Master Response 3, located in Section 6.2 of this document, concerning cost and availability of the document.

Response to Comment 111-5

Comment Summary: The comment expresses concern about groundwater volumes and impacts to artesian wells.

The groundwater impact analysis presented in Section 4.5 of the Draft EIR/EIS addresses potential impacts from groundwater mounding. Computer modeling and other calculations used to assess potential groundwater impacts did not provide information in the form requested (total volumes). The groundwater analysis included a review of Department of Water Resources well records. All wells that could be documented were included in the Project database along with information on groundwater levels, water production, and groundwater quality, where available. Some of these wells, such as the ones described in the comment, may be artesian. Artesian wells are basically the same as other wells except that the groundwater is under enough pressure (head) to cause the water to rise in the well above the ground surface. Artesian wells, if present at a selected reservoir site, could experience increased flow due to increased head.

Response to Comment 111-6

Comment Summary: The comment requests proof of the total volume of water in the West County hills, and how it would affect alternatives.

The volume of water in the Project area was not presented in the Draft EIR/EIS because the information was not deemed to be necessary for an analysis of groundwater impacts. However, the Department of Water Resources reports that were used as reference material for the groundwater evaluation do contain estimates of groundwater in storage for much of the Project area. Interested readers can review this information in the following reports in the Project library: Evaluation of Groundwater Resources Sonoma County, Volume 1 Geologic and Hydrogeologic Data (December 1977); Volume 2, Santa Rosa Plain (September 1982); Volume 3, Petaluma Valley (June 1982). The Draft EIR/EIS does, however recognize that drainage will have to be managed carefully. Refer to Mitigation Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff on page 2-23 of the Draft EIR/EIS.

Response to Comments 111-7 and 111-8

Comment Summary: The commentor indicates that the Draft EIR/EIS indicates that one of the mitigating factors is a “No Alternative” alternative and one of the guidelines under this alternatives is that the City continue its existing water conservation practices which reduce wastewater flow. The commentor then asks why the continuation of water conservation practices is not included in the other alternatives and whether inclusion of these practices wouldn’t insure lower cost.

The “No Alternative” alternative, identified in the Draft EIR/EIS as the No Action (No Project) Alternative, is not a mitigating factor, but rather one of the five alternatives considered as part of the Project. This No Action (No Project) Alternative is required

under CEQA and NEPA as a basis for comparison of impacts with the other alternatives. The comment is correct in stating that continuation of existing water conservation practices by the City of Santa Rosa is part of the No Action (No Project) Alternative, as is continuation of conservation practices by other member entities in the Subregional System. Further, as stated in Section 3.1 of the Draft EIR/EIS (page 3.1-8), continuation of existing conservation practices was included in the calculation of the projected wastewater flow, which was then used in sizing Project components for all of the other alternatives. Therefore, the Project costs presented in Section 3.4 of the Draft EIR/EIS reflect the cost savings for the Project due to continuation of water conservation practices.

Response to Comment 111-9

Comment Summary: The comment asks what kind of revenue is the city seeking to claim from the high volume of “product” the city will have from the other alternatives without strict water conservation being implemented.

The only revenue which has been considered for the Project as part of the Draft EIR/EIS is that from service charges and demand fees paid by existing and new rate payers. The estimated additional service charges and demand fees are given in Tables 4.18-13 and 4.18-15 on pages 4.18-34 and 4.18-36, respectively, of the Draft EIR/EIS. As stated in Response to Comment 111-7, conservation is a part of all alternatives. Economic analyses have not assumed that the City will charge irrigators for reclaimed water. Refer to Master Response 13, located in Section 6.2 of this document.

Response to Comment 111-10

Comment Summary: The comment indicates that the cost of construction is going to be passed on to the rate payers and asks how is the revenue from hook-ups and any other charges the City will receive be distributed.

The estimated additional service charges and demand fees shown in Tables 4.18-13 and 4.18-15 on pages 4.18-34 and 4.18-36, respectively, of the Draft EIR/EIS were calculated based upon the amounts necessary to pay for the cost of construction and financing of the Project. These tables show the additional charges and fees for the years 2000, 2005, 2010 and at buildout, which is estimated to occur in the year 2017. The charges and fees are based upon 20 year financing of the Project, and after 20 years, the additional charges and fees to pay for the Project capital cost will no longer be required. Costs for operations and maintenance will still be required. As stated in Response to Comment 111-9, economic analyses have not assumed that the City will charge irrigators for reclaimed water.

Response to Comment 111-11

Comment Summary: The comment asks what will be done with asphalt torn up during pipelaying.

Asphalt removed from roads will be taken to a central location for disposal or reuse.

Response to Comment 111-12

Comment Summary: The comment asks if tar and asphalt are hazardous materials.

Tar and asphalt are not hazardous materials. Both materials are routinely accepted by Class II municipal solid waste landfills, which accept only non-hazardous wastes.

Response to Comment 111-13

Comment Summary: The comment asks if asphalt recycling is possible.

Asphalt recycling may be cost-effective for a project of this magnitude. Asphalt removed from roads could be taken to a recycling facility, reprocessed, and used to repave areas where pipelines were installed. This will not generate revenue for the City, but could reduce the cost of repaving roadways.

Response to Comment 111-14

Comment Summary: The comment asks if property owners would be responsible for stock-piling during excavation.

As described in Measure 2.2.22: Park Within Construction Easements on page 2-54 of the Draft EIR/EIS, the City of Santa Rosa will obtain construction easements to be used as staging areas for worker vehicles, construction equipment, and storage of materials during construction. If suitable area is not available within public right-of-way or other publicly-owned property, easements will be negotiated with property owners who are willing to provide staging areas.

Response to Comment 111-15

Comment Summary: The comment suggests that the Draft EIR/EIS inaccurately assumes that West County agriculture will all be converted to fruit and vegetable crops.

The statement from the Appendix E-2 (Irrigation Suitability Land Classification-West County) of the Draft EIR/EIS is quoted out of context. As stated earlier in the same paragraph, the water balance for the Project assumes "a project with a high amount of irrigated hay, pasture and forage crops." There is no assumption that agriculture will change, but there is an acknowledgment of the implications if there are changes, even if the changes may be unlikely.

Response to Comment 111-16

Comment Summary: The comment suggests that West County landowners would be forced to change to more intensively farmed fruit and vegetable crops.

Individual landowners will have discretion as to which crops can be grown, and the Draft EIR/EIS predicts that most lands will remain in pasture. There will, in fact, be restrictions against conversion to specialty crops of lands with slopes greater than 5 percent. Refer to Mitigation Measure 2.3.2: Restrict Approval of Agricultural Irrigation Contracts, on page 2-63 of the Draft EIR/EIS.

Response to Comment 111-17

Comment Summary: The comment suggests that stricter conservation practices would preclude the need for higher discharge.

Conservation measures can reduce discharge, and all of the Alternatives include substantial conservation measures. However, the section of the Draft EIR/EIS referenced in the comment is correct that higher river discharge alternatives reduce the irrigation land requirements. At any given level of conservation, there will still be reclaimed water which must either be discharged to the river or used in some other manner such as irrigation. For the agricultural irrigation alternatives, the more discharge to the river, the less irrigation land is required.

Response to Comment 111-18

Comment Summary: The comment asks what number of West County owners denied entry to lands that may be impacted by the project. The comment also asks how many acres were involved in the denied access.

A database that addressed access to the lands that are suitable for irrigation was maintained through December 1994. The purpose of the data base was to identify lands that provide suitable irrigation land, provide an estimate of the suitable acreage, and identify the current landowner in order to gain access to conduct any studies that were needed to support the analyses in the Draft EIR/EIS. As of December 1994 the database showed that approximately 9,325 acres of land in the West County provided land that was suitable for irrigation. Of this total acreage access was initially authorized for approximately 8,030 acres. However, it should be noted that some landowners who initially granted access to their lands later denied access. It is estimated that approximately 25 percent of the total irrigable acreage in the west county was ultimately inaccessible to the Draft EIR/EIS study team.

Response to Comment 111-19

Comment Summary: The comment states that irrigation studies are inaccurate because on-site surveys were not conducted for all potential irrigation areas.

Refer to Response to Comment 29-2.

Response to Comment 111-20

Comment Summary: The comment states that photo interpretation is not a substitute for landowners' knowledge of their property.

The Draft EIR/EIS authors agree. Refer to Response to Comment 29-2.

Response to Comment 111-21

Comment Summary: The comment suggests that reclamation would "abuse" the land, and agricultural revenues would be reduced.

The Draft EIR/EIS authors do not agree that irrigation with reclaimed water will harm agricultural areas. Effects on soil are evaluated in Section 4.2, and no significant effects were identified. Economic analysis in Section 4.18 shows that there can be substantial economic benefits associated with provision of reclaimed water.

Response to Comment 111-22

Comment Summary: The comment asks if the City of Santa Rosa would subsidize landowners for loss of income due to implementation of the West County Alternative.

The proposed program for establishing new irrigation areas is described in Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS. The City of Santa Rosa may provide assistance to irrigators in establishing their irrigation system. The precise terms of the assistance will be determined in the contracts with individual irrigators. Refer to page 18 of Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS, for a discussion of potential reclaimed water pricing structure. There is no reason to assume that irrigation will cause a loss of income.

Response to Comment 111-23

Comment Summary: The comment asks what time of year the irrigation suitability study was done.

As described on page 3 of Appendix E-2 (Irrigation Suitability Land Classification-West County Area) of the Draft EIR/EIS, the original work was conducted by North State Resources in the fall of 1989. Field work to verify soils and land use mapping was conducted by Questa Engineering, with most work conducted in the fall, some in the winter, and verification in the spring.

Response to Comment 111-24

Comment Summary: The comment, referring to page 8 of Appendix E-2, asks "what are the acres involved?"

The EIR/EIS authors are not sure what acreage is being requested in the comment. The acres of each land classification are found in Table 4 on page 9 of Appendix E-2 (Irrigation Suitability Land Classification-West County Area) of the Draft EIR/EIS. Also, refer to Response to Comment 111-25.

Response to Comment 111-25

Comment Summary: The comment states that the total acres of occasionally occurring wetland characteristics are important.

The comment is correct that wetlands are an important constraint to implementation of irrigation. Wetlands in irrigation areas are described and mapped in Appendix M-1 (Planning Level Wetland Determination for Proposed Agricultural Irrigation Areas) of the Draft EIR/EIS. Acreage in each potential irrigation area is shown in Table A, which begins on page 15 of Appendix M-1. Almost 1,700 acres of wetlands were mapped in the Americano Creek area, and about 1,850 acres were found in the Stemple Creek area.

Response to Comment 111-26

Comment Summary: The comment states that the volume of wetlands could play an important role in the implementation of pasture irrigation.

The comment is correct. As set forth in Mitigation Measure 2.2.5: Avoid Sensitive Biological Resources on page 2-28 of the Draft EIR/EIS, wetlands will not be irrigated.

Response to Comment 111-27

Comment Summary: The comment asks for support for the statement that "The lack of a developed, dependable, and inexpensive water supply has significantly constrained irrigated agriculture development in the West County areas."

The statement is based on the survey of existing agricultural uses in the Project area, which is presented on pages 10 through 12 of Appendix E-2 (Irrigation Suitability Land Classification-West County Area) of the Draft EIR/EIS. The study showed that "Irrigated cropland accounts for less than two percent of the total Project acreage." The survey of existing agriculture found that the area does not have "an irrigation water storage and delivery system such as those that have been developed for other similar areas along the central California coast such as the coastal areas of Santa Cruz and Monterey." It is thus clear that the area currently does not have a developed water supply, and 98 percent of agriculture is not irrigated. The Draft EIR/EIS did not evaluate other water supply options for West County, and does not contend that Santa Rosa's reclaimed water is the

only possible supply. Other options, such as purchase of water from the Sonoma County Water Agency, might be possible.

Response to Comment 111-28

Comment Summary: The comment asks for proof that the City has checked other than at Two Rock's dry wells.

Appendix H-4 (Well Installations and Groundwater Monitoring Results) of the Draft EIR/EIS provides data from the eight monitoring wells that were installed in West County. Table 2.1 on page 2-9 in Appendix H-4 provides a well construction summary. Hydrogeology of the Project area is further described in Appendix H-1 (Hydrogeology of Storage/Reuse Areas and Evaluation of Potential Impacts to Groundwater) of the Draft EIR/EIS. As described there, additional data on groundwater was obtained from well logs compiled by the Department of Water Resources; water level data were also obtained from geotechnical investigations conducted in the vicinity of dam sites. Refer also to Appendix F-1 (Geotechnical Assessment of Alternative Reservoir Sites and Pipeline Routes) of the Draft EIR/EIS.

Response to Comment 111-29

Comment Summary: The comment asks what the price of reclaimed water would be.

Price has not yet been determined. A potential structure for pricing and prioritization is discussed in Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS, starting on page 17.

Response to Comment 111-30

Comment Summary: The comment asks what governing body would control pricing and supply.

The City of Santa Rosa will control price and supply.

Response to Comment 111-31

Comment Summary: The comment asks what controls would be in place to protect initial users for price and supply.

Each user will sign a contract with the City of Santa Rosa establishing price and any guarantees for supply. These contracts have typically been for 20-year terms. Refer to Response to Comment 111-29.

Response to Comment 111-32

Comment Summary: The comment states that water supply is a problem throughout the State of California.

The Draft EIR/EIS authors agree.

Response to Comment 111-33

Comment Summary: The comment states that existing groundwater resources could be a source of revenue for landowners.

Any individual landowners with ample groundwater resources may choose not to contract with the City for reclaimed water. Refer to Response to Comment 111-6 regarding volumes of water in the Project area.

Response to Comments 111-34 and 111-35

Comment Summary: The comment states that the Draft EIR/EIS does not provide adequate proof that a “dependable source of irrigation water” does not exist and quotes a discussion of potential climate and drainage problems and suggests that if wet springs are a problem then reclaimed water would not improve agricultural productivity.

The statement in the Draft EIR/EIS has been quoted out of context. The full text is a discussion of potential limitations for growing a particular crop, alfalfa, and states:

"Considering the large amount of alfalfa hay imported, market conditions would seem ideal for the more extensive planting of alfalfa if there is a dependable source of irrigation water. However, even where irrigation water has been available, alfalfa hay has not been grown very successfully in western Sonoma County. There is a high risk of crop failure or reduced yields in many areas with poor drainage conditions, particularly following wet springs. Cooler than normal summers may also make curing of the cut hay difficult. New cultural practices, such as the use of raised bed planting techniques, and improved or more adaptable alfalfa varieties, must be developed before alfalfa can be considered as a potential crop for widespread use in the West County."

The document thus concludes that alfalfa is likely not a suitable crop. Problems with a particular crop do not mean irrigation in West County is not viable. Refer to Response to Comment 111-27. Refer also to the discussion of socio-economics in Section 4.18 of the Draft EIR/EIS for an evaluation of the potential economic benefits of irrigated agriculture.

Response to Comment 111-36

Comment Summary: The comment states that flow of reclaimed water would be continual, implying that irrigation users would be forced to take more water than they need.

The comment is not correct; in fact the opposite will be the case. West County irrigators will be required to employ deficit irrigation management on all drought tolerant or non-water deficit sensitive crops in West County. Refer to Mitigation Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff on page 2-23 of the Draft EIR/EIS for a

discussion of deficit irrigation management. Additional details are presented starting on page 25 of Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS.

Response to Comment 111-37

Comment Summary: The comment claims that the Draft EIR/EIS states that land will be condemned for irrigation sites.

The comment is not correct. The Draft EIR/EIS does not state that irrigation sites will be condemned. It is the City's intent to contract with interested landowners to provide reclaimed water for irrigation.

Response to Comment 111-38

Comment Summary: The comment states that the statement "can be converted to irrigated pasture" is incorrect, and should read "will".

The quote is taken out of context. The full sentence is "Some of the gently sloping lands and most of the steeper native pasture areas (with slopes of up to 15 percent) can be converted to permanent irrigated pasture." This section of Appendix E-2 (Irrigation Suitability Land Classification-West County Areas) of the Draft EIR/EIS discusses potential crops. It is not stating what will happen, but evaluating what types of agriculture can be implemented in various areas. What will happen is up to individual land owners, as long as they meet the requirements of Irrigation Conservation and Management Plans.

Response to Comment 111-39

Comment Summary: The comment asks if the need for rest-rotation management of pasture would render lands unusable.

Refer to page 39 of Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS for a discussion of irrigated pasture management. Improved grass production associated with irrigation more than compensates for the need to periodically rest portions of the pasture. As shown on page 12 of Appendix E-2 (Irrigation Suitability Land Classification-West County) of the Draft EIR/EIS, well-managed dryland pasture typically supports four (4) animal unit months (AUMs) per acre. It is estimated that well-managed irrigated pasture can support about 12 AUMs per acre (refer to page 13 of Appendix E-2 of the Draft EIR/EIS).

Response to Comment 111-40

Comment Summary: The comment asks if supplemental feed costs would rise when pasture was not available.

Supplemental feed is not needed to implement rest-rotation management. Refer to Response to Comment 111-39.

Response to Comment 111-41

Comment Summary: The comment asks what would happen if the property owner does not have enough acreage to implement pasture rotation.

It is proposed that 20-acre parcels are the minimum size for irrigation contracts. A 20-acre parcel will likely be the smallest size feasible for rest-rotation management.

Response to Comment 111-42

Comment Summary: The comment asks who would pay for perimeter and cross-fencing.

The City may choose to provide assistance to new irrigators in getting established, but the specifics of payment for fencing and other improvements have not been determined. This will be negotiated with individual property owners when irrigation contracts are developed.

Response to Comment 111-43

Comment Summary: The comment suggests that the list of vegetable crops presented on page 13 of Appendix E-2, would preclude landowners from continuing with current crops.

The text of the Draft EIR/EIS states "Approximately 2,500 acres of land are thought to be suited for irrigated fruit and vegetable crops in the West County area." This statement in no way implies that fruit and vegetable crops will need to be grown by landowners. Landowners will have discretion to continue with existing crops. Refer to Response to Comment 111-16.

Response to Comment 111-44

Comment Summary: The comment states that irrigation efficiency figures on pages 18 and 19 of Appendix E are contradictory, with 60 to 80 percent efficiency quoted on page 18, and 80 to 85 percent quoted on page 19.

The full text of the quotes is: "Typical efficiencies for sprinkler irrigation range from 60 to 80 percent, indicating approximately 20 to 40 percent more water is applied to a field beyond crop needs." "Overall, an irrigation efficiency between 80 and 85 percent is anticipated for the West County area, based on a mix of approximately 80 percent efficiency sprinkler irrigated crops, 85 to 90 percent efficiency drip irrigated specialty crops, and an extensive acreage of deficit irrigated pasture and forage crops targeted at 85 percent efficiency." Thus, it can be seen that the statements are not contradictory.

Response to Comment 111-45

Comment Summary: The comment asks where the wind studies are presented.

Wind patterns are described on page 4.12-6 of the Draft EIR/EIS.

Response to Comment 111-46

Comment Summary: The comment asks whether existing irrigators in West County have been interviewed regarding effects of wind on irrigation.

The Draft EIR/EIS authors talked to Phil Littlefield at the Coast Guard station regarding their irrigation program and water use rates. Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS provides guidelines for design of sprinkler irrigation systems to account for winds in the Project area (see page 37 of Appendix D-19). It is also suggested that a California Irrigation Management Information System (CIMIS) automated weather station be constructed in the irrigation area to aid in management of irrigation (see page 28 of Appendix D-19).

Response to Comment 111-47

Comment Summary: The comment states that current water users are in an area different from West County, and data from their systems cannot be applied to West County.

Projected water use for West County was calculated independently, using methods described on pages 17 through 20 of Appendix E-2 (Irrigation Suitability Land Classification - West County Area) of the Draft EIR/EIS. The information on existing users is simply presented for comparison.

Response to Comment 111-48

Comment Summary: The comment contends that the statement on page 21 that occasional summer fallowing may be needed contradicts statements on page 14 and 15 regarding "no crop restriction".

The statement from page 14 of Appendix E-2 (Irrigation Suitability Land Classification - West County Area) of the Draft EIR/EIS is taken out of context. The pertinent portions of the quote are: "No restrictions on crop choice are imposed by the state on use of reclaimed water that meets tertiary treatment standards... From an agricultural perspective, the water is also of high quality with no restrictions on land use ... Constraints on the selection of crops (crop choice) are imposed ... by soil, slope, and drainage as well as micro-climatic conditions." This is precisely the point of the discussion on page 21 of Appendix E-2; there is no contradiction.

Response to Comment 111-49

Comment Summary: The comment asks for proof that drainage problems will fix themselves.

Generally drainage problems can be fixed by allowing the periodic re-establishment of the original water table and drainage conditions. However, the Draft EIR/EIS recognizes that in some areas it may not be possible to overcome problems, and states that "If none of the Best Management Practices are effective in restricting surface and subsurface irrigation water runoff, the City will cease delivery of Project water." Refer to the last paragraph on page 2-25 of the Draft EIR/EIS discussing Measure 2.2.3:: Restrict Surface and Subsurface Irrigation Water Runoff.

Response to Comment 111-50

Comment Summary: The comment asks what controls would be in place to ensure that adjacent sites would not effect the dry year reestablishment.

Refer to Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff, on page 2-23 of the Draft EIR/EIS, which describes measures to manage drainage.

Response to Comment 111-51

Comment Summary: The comment asks about financial losses for property owners when employing summer fallowing.

As described on page 21 of Appendix E-2 (Irrigation Suitability Land Classification - West County Area) of the Draft EIR/EIS, summer fallowing consists of "growing a dry-land hay crop, or crop with greatly reduced irrigation application". While revenues will likely be less than in years when irrigated crops could be grown, they should not be any less than under existing conditions. This practice may be necessary in some areas to ensure continued productivity of problem areas.

Response to Comment 111-52

Comment Summary: The comment asks if the City of Santa Rosa will compensate landowners for any revenues lower than those "committed to the landowner through the facts stated in this EIR".

The Draft EIR/EIS estimates of the economic benefits that could result from irrigated agriculture do not consist of a guarantee or warranty of any kind regarding revenues to individual landowners. The City is not in a position to be able to guarantee specific revenues for landowners. Individual irrigators will have to decide whether irrigation will be a benefit for their particular operation.

Response to Comment 111-53

Comment Summary: The comment asks how many years it will take until expenses of conversion to irrigation are paid for and irrigators are operating "in the black".

It is not possible to provide a precise time-frame, because terms of irrigation contracts have not been determined, and different users will certainly have different profits, depending on the crop. However, Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS discusses these items in two sections: 2.10, Assistance in Initial Crop Establishment - Management and Harvesting, and 2.11, Implementation and Cost Sharing. As stated on page 22 in Appendix D-19, "Determining levels of assistance in financing and management may be addressed on a case-by-case basis with individual irrigation users."

Response to Comment 111-54

Comment Summary: The comment asks for case studies of irrigation working in soil areas matching those of West County.

Suitability of soils for irrigation was based on characterization of the soils using established parameters such as texture and drainage characteristics. West County areas are dominated by the following soil associations: the Goldridge-Cotati-Sebastopol association, the Steinbeck-Los Osos Association, and the Pajaro association. The first two soils are moderately well-drained to well-drained, while the Pajaro soils are somewhat poorly drained sandy loams and clay loams. The City of Santa Rosa's existing irrigation system is operating successfully on less suitable soils. The Huichica-Wright-Zamora association and the Clear Lake-Reyes association in the existing irrigation program are poorly drained to somewhat poorly drained clays and loams. The City has not conducted a pilot program on the specific soils found in the West County Project area, but the success of its existing reclamation program and the success of other reclamation programs in the state, can be extrapolated to the West County by evaluating site-specific characteristics such as soils, topography, and climate.

Response to Comment 111-55

Comment Summary: The comment asks who would pay for irrigation management services.

Overall costs for operations and maintenance (O&M) of irrigation areas are included in the Project cost estimate, Appendix D-30 (Alternative Projects Construction Cost Estimate) of the Draft EIR/EIS. It is estimated that O&M costs will be about \$205,000 per year. Payment for irrigation management services will be negotiated with individual users as part of the contract for reclaimed water. If the City pays for these services it will increase operations and management costs, which are ultimately paid for by the rate payer.

Response to Comment 111-56

Comment Summary: The comment asks who would pay for any decreases in agricultural productivity.

Studies in the Draft EIR/EIS show that overall agricultural productivity will increase. Refer to Response to Comment 111-21. Reductions in productivity of small problems areas within a particular field will not result in an overall reduction in productivity.

Response to Comment 111-57

Comment Summary: The comment suggest that most measures would only fix problems after they have happened, rather than preventing problems.

Extensive planning measures are in place to develop Irrigation Conservation and Management Program so that irrigation is designed to avoid problems. Refer to Measures 2.2.1 through 2.2.7 in Chapter 2 of the Draft EIR/EIS. The Draft EIR/EIS also recognizes that, even with good planning, some problems may occur, and, in these measures, proposes corrective actions if performance standards are not met.

Response to Comment 111-58

Comment Summary: The comment asks what controls are in place and what personnel the City of Santa Rosa has to monitor and solve problems.

Measures for monitoring and controls are specified in Measures 2.2.1 through 2.2.7 in Chapter 2 of the Draft EIR/EIS. The City of Santa Rosa has staff who operate their existing reclamation system, but will likely have to hire staff to manage new reclamation areas. The staffing required will depend on the size of the Project that is ultimately selected.

Response to Comment 111-59

Comment Summary: The comment states that the Draft EIR/EIS suggests that West County would benefit from irrigation with reclaimed water.

The comment correctly relates the findings of the Socio-economics evaluation presented in Section 4.18 of the Draft EIR/EIS.

Response to Comment 111-60

Comment Summary: The comment suggest that property owners would be forced into intensive fruit and vegetable farming.

The comment is not correct. Refer to Response to Comment 111-16.

Response to Comment 111-61

Comment Summary: The comment objects to referring to the West County Alternative instead of the West County Option.

The EIR/EIS authors fail to see a meaningful difference in the two terms. Webster's Dictionary defines "option" as "a choosing; choice" and "alternative" as "a choice between two or more things".

Response to Comment 111-62

Comment Summary: The comment objects to the description of agriculture in the West County as "constrained due to the lack of a dependable water source".

There is virtually no irrigated agriculture in the Project area, indicating that there are constraints to development of irrigated agriculture. The Draft EIR/EIS does not suggest that existing agricultural operations are not viable. Refer to Response to Comment 111-27.

Response to Comment 111-63

Comment Summary: This comment consists of cost of production figures from 24 dairies surveyed in Sonoma and Marin counties, calculated by the Cost of Production Unit, Dairy Marketing Branch, California Department of Food and Agriculture, Sacramento. The comment also states that any interruption in the agricultural community of Sonoma and Marin counties would have catastrophic impacts.

The EIR/EIS authors agree that agriculture is an important part of the local economy, but do not agree that the Project will have adverse effects on the agricultural economy. Refer to Section 4.18 of the Draft EIR/EIS for a discussion of potential benefits to agriculture.

Response to Comment 111-64

Comment Summary: This comment is a draft version of the Comment Letter 111, submitted by fax.

Responses to Comments 111-1 through 111-63 respond to the comments in this letter.