

**COMMENT LETTER 122 - BOB SMITHFIELD (OCTOBER 4, 1996), RECEIVED
OCTOBER 7, 1996**

Response to Comment 122-1

Comment Summary: The comment acknowledges that all of the alternatives have potential environmental consequences, and references the subsequent comments.

These subsequent comments are responded to specifically below.

Response to Comment 122-2

Comment Summary: The comment questions whether the Erosion Analysis (Vol. VI, Appendix E-7) documents existing/baseline erosion conditions.

The USLE model that was used in the erosion impact assessment included an existing conditions analysis incorporating current dry-farmed oat hay and grazing lands. Existing conditions are compared to future conditions (with an irrigation/reclamation Project) in Tables 1 through 7 in Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) of the Draft EIR/EIS. The main focus of the analysis was to compare erosion rates (using USLE) from conversion of rangeland and dry-farmed hay land to more intensively cultivated irrigated crops, which employ good conservation technology.

Response to Comment 122-3

Comment Summary: The comment questions whether information contained in the Erosion and Sediment Study, Stemple Creek Watershed, was extrapolated, selectively used and assumed to be applicable to the Americano watershed.

Information was taken from the Stemple Creek watershed and applied to the Americano Creek watershed. These are very similar, adjacent watersheds, with similar soils, geology, vegetation, climate, and land-use patterns. Extrapolation and inference of data from a detailed study completed for one watershed to another watershed is common in many disciplines, including biology, hydrology, and agronomy. Also refer to Master Response 5, located in Section 6.2 of this document.

Response to Comment 122-4

Comment Summary: The comment requests detailed substantiation to support selective use and application of the Resource Conservation District (RCD) material.

The EIR/EIS authors do not agree that detailed substantiation is needed, or that the RCD material has been used only selectively. The watersheds are similar. The information was merely used to place soil erosion and sediment yield from sheet and rill erosion into a general watershed-wide perspective, for the benefit of the reader, comparing it to other

sources of erosion. This was done because USLE does not account for erosion from these sources. This information was also used to compare and contrast West County versus South County areas. The main findings and conclusions from the erosion analysis draw from the crop conversion erosion comparisons, not this section. Short of doing a similar costly and time-consuming analysis for each sub-watershed, such use of information, prepared by objective professionals, seems justified. The EIR/EIS authors see no point in completing detailed watershed wide erosion inventories of all the Project impacted watersheds, and did not propose such studies during Project scoping, nor were they requested during scoping. The comment does not suggest any substantial reason to do so. Also refer to Master Response 5, located in Section 6.2 of this document.

Response to Comment 122-5

Comment Summary: The comment states that the Draft EIR/EIS should be considered inadequate if the above described detailed analysis for the Americano watershed has not been completed.

Refer to Responses to Comments 122-3 and 122-4. The watershed wide analysis was used primarily to provide background and perspective to the reader on the importance of rill and gully erosion of Project irrigable lands, considering the watershed as a whole and other erosion processes.

Response to Comments 122-6 and 122-7

Comment Summary: The comment points out that the various sub-watersheds of Stemple Creek have very different erosion/sedimentation rates and suggests using a 1,000 tons per square mile annual figure is misleading.

Refer to Response to Comments 122-4 and 122-5. The intent of the statement in the Draft EIR/EIS was to provide perspective as to overall erosion rates in the watershed and compare and contrast the West County and South County areas.

Response to Comments 122-8, 122-9, 122-10, and 122-11

Comment Summary: The comment critiques the way the RCD's data from their Stemple Creek watershed study was abstracted and presented in the Erosion Analysis, and implies that the findings and conclusions of the erosion analysis and irrigation suitability are not reliable.

The comment overstates the importance of the very brief abstraction of the RCD study and apparently missed the point and focus of the Erosion Analysis. Since USLE does not deal with gully erosion, landsliding, and streambank failure and has as its best use a comparison of cropping practices on agricultural lands, Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) of the Draft EIR/EIS put soil loss from agricultural lands in perspective with that from other sources (i.e., streambank failure) and compared and contrasted the overall erosion problems of the

South and West County areas. Appendix E-7 points out that erosion hazards and erosion rates are likely higher in the West County than the South County. A larger, more detailed abstraction of the RCD Stemple Watershed Erosion Analysis does not seem useful. This information can be referenced, and the interested reader can review the original data in detail.

Response to Comment 122-12

Comment Summary: The comment provides a comparison of the agricultural land use reported in the Draft EIR/EIS for the Stemple Creek watershed and that reported in the RCD Stemple Creek Watershed Soil Erosion Evaluation and notes a substantial difference between the two.

The inventory for the Stemple watershed irrigable lands was carefully done utilizing aerial photography and field checks and acreage calculated by an AutoCad computer system. The maps and data are available for review. Potentially irrigable lands inventoried for the Draft EIR/EIS in the Stemple watershed only comprise a portion of the total watershed studied by the RCD. Since the study areas are different, the numbers would not be expected to match.

Response to Comments 122-13, 122-14 and 122-15

Comment Summary: The comment presents additional information on agricultural land-use in the Watershed from the RCD Stemple report and questions again how the data reported in the Draft EIR/EIS Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) was derived.

Refer to Response to Comment 122-12.

Response to Comment 122-16

Comment Summary: The comment again cites the RCD Stemple Creek Erosion Study in this section, but asks no specific questions.

The EIR/EIS authors assume that the comment agrees with mitigation to stabilize gullies. A more detailed response is not possible.

Response to Comment 122-17

Comment Summary: The comment states that Table 2A and 5 of Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) stumble or fail badly to provide a view of existing West County agriculture, agricultural practices, and erosion factors.

Descriptions of West County agriculture and agricultural practices that provide an adequate overview for purposes of describing existing conditions are contained in the Draft EIR/EIS in Appendix E-3 (Cropping Scenarios for the West County and South

County Reclamation Alternatives) and Appendices E-1 and E-2 (Irrigation Suitability Land Classification - South County Area; and Irrigation Suitability Land Classification - West County Area) . The EIR/EIS authors believe the overview of existing West County erosion problems provided in Appendix E-7 is adequate and the RCD study is cited in Appendix E-7 for interested readers wanting further information. There is no point in a longer abstract and summary when the RCD Report is available as a reference.

Response to Comment 122-18

Comment Summary: The comment states the case studies in Table 2A of Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) appear to have been randomly selected, and bear little resemblance to Table 5.

Case studies presented in Table 2A of Appendix E-7 of the Draft EIR/EIS were not randomly selected; they represent expected soil loss for the main current agricultural land-uses for the most widespread soils in the West County. Table 5 in Appendix E-7 is a model of expected future soil losses if South County lands were converted to a range of intensities of agricultural land-use, the so-called low-tech, medium-tech, and hi-tech scenarios used in Appendix E-3 (Cropping Scenarios for the West County and South County Reclamation Alternatives). Table 6 in Appendix E-7 provides similar data for the West County. Uses in Tables 2A and 5 in Appendix E-7 are thus supposed to be different.

Response to Comments 122-19, 122-20 and 122-21

Comment Summary: The comment questions whether bias was introduced into the Erosion Analysis in selection of case studies for evaluation and states the per acre soil losses calculated in Table 5 of Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) don't match the 1,000 tons/square mile average cited earlier in the report.

The 1,000 tons/square mile referenced was a watershed wide average provided to give the reader an overall perspective of the magnitude of current erosion problems in the West County. Table 5 of Appendix E-7 of the Draft EIR/EIS is a model of future soil loss for the South County reported on a total tons basis, for different cropping scenarios. Table 6 provides similar data for the West County. The crops for modeling were not randomly selected or selected with the intent to bias the results, but represent potential crops that could be grown under differing agricultural intensity scenarios reported in Appendix E-3 (Cropping Scenarios for the West County and South County Reclamation Alternatives) of the Draft EIR/EIS. Table 2A in Appendix E-7 does not provide data for the scenarios in Tables 5 and 6; Table 2A shows existing dry-farmed conditions, while Tables 5 and 6 show future irrigation scenarios.

Response to Comments 122-22 and 122-23

Comment Summary: The comment disagrees with the case studies selected for the Erosion Analysis, cites poor correlation with the 1,000 tons per square mile average referred to and suggests that they don't closely match the RCD's findings.

The RCD data on existing conditions for agriculture, pasture, and range land may not match well with estimated future soil loss from similar kinds of land-use because the analysis in Appendix E-7 assumed implementation of erosion control technologies and a high degree of irrigation and conservation management, which will be required for these lands, as outlined in Measure 2.2.1: Irrigation Conservation and Management Programs, on page 2-21 of the Draft EIR/EIS.

Response to Comments 122-24 and 122-25

Comment Summary: The comment states that the Erosion Analysis, which formed the basis for the findings of the Draft EIR/EIS, does not adequately portray existing agricultural conditions and erosion problems in the West County and that bias or poor technical analysis needs to be corrected.

The analysis was completed by an objective Certified Professional Erosion and Sediment Control Specialist using case studies which compare existing and future soil loss under a range of realistic cropping scenarios. These were selected to represent typical soils, common slopes, and expected cropping patterns outlined in Appendix E-3 (Cropping Scenarios for the West County and South County Reclamation Alternatives) of the Draft EIR/EIS. The comment letter exhibits substantial misunderstanding of the erosion analysis, which has been clarified in the above responses.

Response to Comments 122-26 and 122-27

Comment Summary: The comment cites failures in the Erosion Analysis presented in Appendix E-7 (Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives) as potentially affecting decision-making and public participation in the Draft EIR/EIS.

The comment demonstrates an apparent misreading and misunderstanding of most of the Soil Erosion Analysis. The Erosion Analysis indicates that if:

1. Restrictions are placed on intensively cultivating sloping areas, and proper soil conservation measures are implemented;
2. Dry-farmed oat hay lands, which are currently vulnerable to erosion during fall rains (prior to establishment of a protective grass cover) are replaced with crops that include a fall protective cover brought up by sprinkler irrigation;
3. Grazing lands are properly managed; and,

4. Eroding gullies and streambanks near irrigation areas are healed, then soil erosion and sediment yields can potentially be reduced significantly over existing conditions, and the Project will not have significant sediment related impacts on the Sanctuary, or West County streams.

This is a logical statement that is supported by selection and use of case studies and analysis utilizing USLE.

The Draft EIR/EIS has identified significant environmental effects of the Project as required by Section 15126 (a) of CEQA, and has evaluated alternatives in a manner designed to foster informed decision-making and public participation as specified in Section 15126 (d)(5) of CEQA.