

**COMMENT LETTER 128 - JOE AND KATHY TRESCH (SEPTEMBER 1996),
RECEIVED OCTOBER 7, 1996**

Response to Comment 128-1

Comment Summary: The comment states that it was difficult to locate all information relevant to the West County alternative in the Draft EIR/EIS and that the allotted time frame for review was unrealistic.

The West County alternative is designated as Alternative 3. The Project description (Chapter 3) identifies subalternatives and Project components for Alternative 3 on page 3.1-26 of the Draft EIR/EIS. Table 3.3-1 on page 3.3-3 of the Draft EIR/EIS identifies the West County components and Chapter 4.1 through 4.19 provide an analysis of these components. The Summary of Impacts for Alternative 3 can be found at the end of each section (Summary of Impacts by Alternative). Refer to Master Response 4, located in Section 6.2 of this document, concerning time for review of the document.

Response to Comment 128-2

Comment Summary: The comment asserts that the Project has had huge impacts to the west county community, including the threat of eminent domain. The comment states that the Draft EIR/EIS fails to take into account the purpose and need for the land and for the Button Ranch to remain an intact and viable ecosystem.

It is a requirement of CEQA and NEPA for documents to explain the purpose and need for proposed projects that must comply with CEQA and NEPA and their guidelines. Section 1.1 describes the purpose and need for the Subregional Long-Term Wastewater Project. Refer to Section 4.1 of the Draft EIR/EIS, which discusses existing land use, and Section 4.2, which discusses impacts to agriculture. The Draft EIR/EIS identifies the socio-economic impacts in Section 4.18. The Draft EIR/EIS also identifies the biological and ecological impacts of the various components proposed for the Project (Section 4.8 through 4.10), and, therefore, addresses Project effects to the Button Ranch and its ecosystem.

Response to Comment 128-3

Comment Summary: The comments asks that change of ownership at the Two Rock site be reflected in the Draft EIR/EIS.

To reflect the change in ownership at the Two Rock site, the following changes are made to the Draft EIR/EIS:

Table 1, Appendix D-7. The Property Owners listed for Assessor's Parcel Number 22-010-04 and for Assessor's Parcel Number 24-090-26 are revised as follows:

Table 1

Property Potentially Affected by Acquisition

Project Component	Assessor's Parcel Number	Property Owner	Total Area of Parcel (Acres)	Only Easement Required
Storage Reservoirs (Including Inlet Pipelines)				
TWO ROCK (Including Inlet Pipeline)	22-010-04	Tresch Joe & Kathy University of California	558.94	Yes
	22-020-01	Mattos John A Jr. & Sandra Et. Al	381.60	
	24-080-01	Tunzi Lester N Life Est Et Al	110.98	
	24-080-03	Gray Richard	306.00	
	24-080-19	County of Sonoma	389.05	Yes
	24-090-16	Tunzi Lester N & Dolores S Et Al	202.00	
	24-090-17	Tunzi Lester N & Dolores S Et Al	32.00	Yes
	24-090-26	Tresch Joe & Kathy University of California	348.67	

Response to Comment 128-4

Comment Summary: The comment states that the Draft EIR/EIS represents the alternatives as having been selected through a process of "consensus building" and states that there was no consensus supporting a West County Alternative.

The EIR/EIS authors concur that there is not a consensus in favor of a West County alternative. In fact, there is considerable opposition to a West County Project. However, the discussion of public involvement on pages 1-15 and 1-16 of the Summary of the Draft EIR/EIS, does not claim any such consensus. The City of Santa Rosa has acknowledged throughout the public process that it may be impossible to reach consensus. The intent of the process is to provide a fair opportunity for public input and public information, recognizing that any selected Project will have opponents.

Response to Comment 128-5

Comment Summary: The comment asks why the west county continues to be considered for project alternatives when landowners are not interested in selling the land to the City of Santa Rosa, as evidenced by the attached subpoena requiring the presence of 24 landowners at court to get access to the lands.

NEPA and CEQA require that the environmental document evaluate all feasible alternatives; alternatives cannot be discarded solely because of public opposition. Refer to Response to Comment 5-9.

Response to Comment 128-6

Comment Summary: The comment states that the amount of acreage available for irrigation under the project has been the subject of controversy for years and refers to a copy of a document titled Agricultural Property Rights Alliance Notice of Rejection being submitted with the comment. The comment asserts that the City cannot undertake the project without condemnation and negative impacts to the environment. The comment also questions the timing of the certification of the EIR occurring prior to determination of available acreage for irrigation. The comment concludes by characterizing the study of Alternatives 2 and 3 as a waste of time and money, due to the array of potential damsites, specter of condemnation and monstrous cost.

With respect to the availability of land for agricultural irrigation, refer to Master Response 6, located in Section 6.2 of this document. The Draft EIR/EIS, in Section 3.3 recognizes that condemnation may be necessary for reservoir sites, pump stations, and a limited number of pipeline segments. The City has indicated that it does not intend to condemn land for irrigation use, and no use of condemnation is included in the Project with respect to areas for either urban or agricultural irrigation. The certification of an EIR is based upon whether the document adequately addresses all impacts of the Project under CEQA, and does not involve selection of a Project. The impacts of the Project are documented in Sections 4.1 through 4.19 of the Draft EIR/EIS, and the Draft EIR/EIS concludes that there are negative impacts from the Project. These impacts are summarized in Table 1-13 in Section 1.9 of the Draft EIR/EIS. For a discussion of the reasons for inclusion of alternatives with significant negative impacts in the Project, refer to Response to Comment 5-9.

Response to Comment 128-7

Comment Summary: The comment suggests that data on the T-5 dam site collected prior to preparation of this EIR/EIS is biased towards selection of a West County project.

The Draft EIR/EIS relied on previously collected geotechnical data where appropriate. The EIR/EIS authors reviewed the data, interpretations, and conclusions and incorporated the findings into this Draft EIR/EIS where appropriate (refer to Response to Comment 89-4). A review of the attached report, prepared by Rogers/Pacific and based on review of published reports and observation of two soil pits, does not reveal any information inconsistent with that presented in the Section 4.3 of the Draft EIR/EIS.

Response to Comment 128-8

Comment Summary: The comment quotes a statement from a Draft Feedback Report dated May 17, 1994 that "We are not relying on previous studies in this EIR process", and suggest that this is in conflict with references to previous work in the Draft EIR/EIS.

The statement was made at a May 17, 1994 meeting in response to the question: "Is there going to be a set of studies to answer some of the questions raised by Michael Joslin's

group's studies of wetlands in the estuaries?" The response was correctly quoted in the comment, but the full response clarified that the scoping process would determine what studies would be necessary. The Draft EIR/EIS does not rely solely on existing information, but has not discarded existing information if it was useful. Existing information has been used where it was appropriate, but has been reviewed by the EIR/EIS authors to ensure its accuracy and completeness. In some cases, studies have been completely redone, if existing information was determined to be outdated or incomplete. In other cases, additional work was done to supplement and verify previously collected information.

The comment is correct regarding the May 17, 1994 Draft Feedback Report not being in the library catalog. The document was available at the City of Santa Rosa, and a copy has been added to the Laguna Treatment Plant library and library catalog.

Response to Comment 128-9

Comment Summary: The comment states that there is a lack of clarity concerning the naming of the Two Rock dam site, and that various names have been used in various studies for the project, but for dams in the same valley. The comment indicates that the dam site known as T-5 is the largest and least expensive to build, and is the one that was selected in the last EIR. The comment voices concern that the T-5 site could be used instead of the T-6A site which is the site included in the present project through a simple application to the Department of Water Resources (DWR), citing as evidence a description of a DWR permit in Section 2.2.4 of Appendix D-5 of the Draft EIR/EIS (page 25). The comment indicates that there are some references (which are not specified by the comment) to capacities for the Two Rock reservoir greater than 4,500 billion [sic] gallons given for the T-6A site. The comment also questions statements in Appendix D-24 [sic] of the Draft EIR/EIS which the comment says indicates that the T-5 dam has the least capacity, and recommends that the maximum capacity reservoir site T-6 not be developed.

The comment is correct that there have been various designations applied to dam sites in the same valley in various studies over the past six years or more. It is just for reasons of clarity and to avoid confusion with the designations in the previous studies that the Draft EIR/EIS refers to the proposed site as the Two Rock reservoir. The comment is also correct in its statement that the location of the dam proposed for the Two Rock reservoir is the site formerly known as the T-6A site, and this is so indicated in Figure RES-6 of Appendix D-32 (Alternative Projects Facilities Plans) of the Draft EIR/EIS.

The comment is incorrect concerning the description of the DWR permit in Section 2.2.4 of Appendix D-5 (Permitting Report) of the Draft EIR/EIS. This section does not state that through an application, another dam site could be substituted for the T-6A site which is included in this Project. The section describes the process by which a permit (which the comment describes as a DWR-3 permit) for approval of plans and specifications for a dam is processed. The application is not simple as characterized by the comment, and as stated in the description in Section 2.2-4, this permit will take at least six months to

process. The permit in question is one of many permits required for the Project which are described in Appendix D-5 of the Draft EIR/EIS. Consideration of any dam site other than one specifically evaluated under this Draft EIR/EIS will require separate environmental documentation and clearance, and it is inaccurate to suggest that another dam site could be substituted through what the comment characterizes as a simple application.

With respect to questions about the T-5 and T-6 dam sites as discussed in Appendix D-14 (Two Rock Reservoir Engineering Technical Memo) (the comment incorrectly states that this is in Appendix D-24 which actually concerns pipelines), the comment appears to base its questions on the mistaken belief that the T-5 site has the largest dam. In fact, the T-5 dam is the smallest of the three. As is indicated on the drawings included as Attachment 6 to this Comment Letter, the elevation of the T-5 dam is 326 feet with the water surface at 316 feet, while the T-6 dam is shown at an elevation of 380 feet with the water surface at 370. Thus because of the difference in height and water surface elevation, the T-5 site is correctly described as having the least capacity of the three sites, while the T-6 site has the largest. Appendix D-14 clearly states that the reason for the selection of the T-6A rather than the T-6 site was that the T-6A site could be configured to provide 4,500 million gallons of storage, while having less impact on wetland acreage and require less site area than the other two alternatives.

Concerning the capacity of the Two Rock reservoir site, the proposed storage capacity, as shown in Table 3.3-2 of the Draft EIR/EIS (page 3.3-21) is 4,000 million gallons which is less than the 4,500 million gallons (not 4,500 billion gallons as stated in the comment) of storage capacity indicated for the T-6A site in Appendix D-14 of the Draft EIR/EIS. The comment does not identify any specific references in the Draft EIR/EIS to a larger capacity for the Two Rock site and therefore no further response can be made.

Response to Comment 128-10

Comment Summary: After general discussion of the last EIR and this Draft EIR/EIS with respect to impacts of the Two Rock dam on shallow wells, the comment contends, that, with respect to Mitigation Measure 2.3.13 in Section 2.3 of the Draft EIR/EIS, provision of such an alternative water supply would have growth inducing impacts which Section 5.3 of the EIR/EIS fails to identify. The comment further states that the provision of a public water system would place pressure on all parcels in the West County. The comment also asks whether the users will be placed on water meters and what the rates will be. The comment concludes by asking if this is a form of annexation.

Section 5.3 of the Draft EIR/EIS provides the basis for the conclusion that the provision of an alternative public water supply under Mitigation Measure 2.3.13: Provide Replacement Water Supply for Affected Wells will not be growth-inducing, because measure 2.3.13 will restrict the number of units served on any parcel to the number of units which would be permitted by the Sonoma County. Since the number of units will not exceed the number allowed by Sonoma County under their General Plan and zoning, the EIR/EIS authors do not believe that such development would place any greater

pressure for development on other parcels in the West County. The policy of the City of Santa Rosa, which will be responsible for supplying the potable water is to meter all water usage. No determination has been made as to the rate to be charged by the City for water supplied through this system. Provision of an alternative water supply is not a form of annexation.

Response to Comment 128-11

Comment Summary: The comment states incorrectly that “Impact 7.5.11” (apparently referring to “Impact 7.5.1) was less than significant.

Impact 7.5.1 was found to be significant because nitrate concentrations in wells downgradient from reservoirs could potentially exceed drinking water standards, but the impact was determined to be less than significant after mitigation. The EIR/EIS authors disagree with the conclusion of this comment (i.e., that the impact is unmitigable) based on the analysis contained in Sections 4.5 and 4.7 of the Draft EIR/EIS and the proposed mitigation in Mitigation Measure 2.3.12. Water quality in monitoring wells downgradient of the reservoirs but upgradient of the nearest drinking water supply will be monitored for nitrates. If drinking water standards are exceeded in the monitoring wells, replacement water supplies will be provided.

Response to Comment 128-12

Comment Summary: The comment asks if the capital costs for the alternatives found in Table 3.4-1 on page 3.4-2 of the Draft EIR/EIS reflect mitigation costs, and if not, to provide estimates for these costs.

Mitigation costs have been included in the capital costs in Table 3.4-1 on page 3.4-2 of the Draft EIR/EIS. For more detailed information about the costs, refer to Appendix D-30 (Alternative Projects Construction Cost Estimate) of the Draft EIR/EIS, .

Response to Comment 128-13

Comment Summary: The comment raises several questions about whether the aggregate resource at the Two Rock site is adequately addressed in the Draft EIR/EIS. The comment indicates that the Sonoma County Aggregate Resource Management (ARM) Plan and Environmental Report of November 1994 states that the Two Rock site [referred to in the ARM Plan as the Walker Road site] contains at least 120 million tons of resource of which the harder resource is estimated at 30 to 40 million tons, not 15 million tons as stated in the Draft EIR/EIS. The comment, after stating that the loss of resource is identified as a significant, unmitigable impact in the EIR/EIS, also questions the validity of Mitigation Measure 2.4.1 concerning removal of aggregate resource prior to construction. Finally, the comment questions the feasibility of aggregate removal, citing Appendix F-1 of the Draft EIR/EIS, and also indicates that the mitigation measures proposed are not included in the cost estimates for the dam and will certainly increase the cost.

The comment is correct in its restatement from the ARM Plan of the total amount of resource estimated at the Two Rock site. However, the 15 million tons referred to in Section 4.1 of the Draft EIR (page 4.1-30) is not to the total resource but to construction grade aggregate, which in Table 5-1 of the ARM Plan (page 5-81), is identified as 15.0 million tons for the Two Rock (Walker Road) site. The ARM characterizes this 15 million tons as predominantly base and subbase rock and distinguishes it from the larger total resource which it estimates at 120 million tons.

With respect to Mitigation Measure 2.4.1: Removal of Aggregate Resources Prior to Construction on page 2-99, the comment appears to be based upon a misunderstanding of the measure as proposed. Section 4.1 of the Draft EIR/EIS (page 4.1-33) states that under this Mitigation Measure only a fraction of the total aggregate resource on the site could be used in the construction of the dam, and the majority of the aggregate will be inaccessible after construction of the reservoir. This is the reason why Section 4.1 concludes that this impact is still significant after mitigation.

With respect to the feasibility of removal of aggregate, Appendix F-1 (Geotechnical Assessment of Alternative Reservoir Sites and Pipeline Routes Volume I) of the Draft EIR/EIS is correct in its conclusions about potential effects on water quality from removal from the north slope of the valley within the reservoir envelope. However, as can be seen in Figure 4.1-5 of the Draft EIR/EIS, extensive areas of the aggregate resource, as mapped in the ARM Plan, lie outside the reservoir envelope, providing a potential source without coming into contact with water in the reservoir. Thus, no mitigation is required. The cost of removal of a portion of the aggregate for use in the construction of the dam has been factored into the cost estimates as presented in Section 3.4 and Appendix D-30 (Alternative Projects Construction Cost Estimate) of the Draft EIR/EIS.

Response to Comment 128-14

Comment Summary: The comment submits a copy of the Stemple Creek Rare Invertebrate Study prepared by Larry Serpa.

The *Stemple Creek Rare Invertebrate Study* (Serpa 1991) was used in the preparation of the Draft EIR/EIS and is referenced on page 2.3-52 of Appendix K-1 (Biological Resources, Volume I), of the Draft EIR/EIS.

Response to Comment 128-15

Comment Summary: The comment states that the premise of agricultural irrigation in the west county on a scale similar to that proposed for the project is incorrect and unsupportable. This comment also states that there are successful farms in the west county.

The analysis provided in the Draft EIR/EIS does not indicate that all or even many of the agricultural operations in the west county are unsuccessful. The analysis states that there

is a constraint to the development of current or other agricultural operations and greater economic benefit. This major constraint is the availability of water. Other types of agricultural operations, that are currently infeasible, will be possible with the availability of water. The Draft EIR/EIS predicts that the most likely use of reclaimed water in the West County is for irrigated pasture, consistent with existing agricultural uses. Refer also to Master Response 6, located in Section 6.2 of this document, concerning feasibility of West County irrigation.

Response to Comment 128-16

Comment Summary: The comment states that storage reservoirs cause loss of farmland, much of which is in Williamson Act Contract, and refers to Attachment 9, a newspaper article about taking of lands under Williamson Act contract for redevelopment.

The Draft EIR/EIS identifies loss of farmland. Table 4.2-6 on page 4.2-12 of the Draft EIR/EIS shows loss of farmland by reservoir; Table 4.2-7 on page 4.2-14 shows loss of Williamson Act Contract Land by reservoir. Attachment 9 is not relevant to the Long-Term Project because the Project is not a proposed urban redevelopment Project.

Response to Comment 128-17

Comment Summary: The comment states that the projects are oversized because there is not enough land in West County suitable for irrigation with reclaimed water. The comment also asks how many acres of suitable land are owned by people who want the wastewater.

The table summarizing classes of land is on page 2 of Appendix E-2 (Irrigation Suitability Land Classification-West County Area) of the Draft EIR/EIS. As noted in the appendix, the total potentially irrigable area is approximately 11,170 acres in West County. Because 6,200 acres are required, there is thus sufficient irrigable land to meet the requirements for irrigation areas for a 1 percent river discharge alternative, and higher discharge rates will require less acreage.

The Draft EIR/EIS has not attempted to determine how many landowners will contract for reclaimed water in West County. Refer to Master Response 6, located in Section 6.2 of this document, for a discussion of feasibility of the West County alternative relative to availability of lands for agricultural irrigation.

Response to Comment 128-18

Comment Summary: The comment contends that Appendix E-2 (Irrigation Suitability Land Classification-West County Area) has conflicting data about growing alfalfa in West County.

The comment is correct that page 12 in Appendix E-2 of the Draft EIR/EIS identifies considerable problems with growing alfalfa hay in West County. Table 6, on page 18 of

Appendix E-2, is not intended to suggest that alfalfa should or should not be grown. That will be a decision for individual landowners to make. The table simply presents water use of a representative range of crops. The EIR/EIS authors do not see this as a conflict or inconsistency.

Response to Comment 128-19

Comment Summary: The comment states that the Draft EIR/EIS references the Santa Rosa Subregional Sludge Beneficial Use Project EIR (LSA 1991) and the Biosolids Beneficial Reuse Project, but does not provide a full description of the sludge element and is therefore incomplete. The comment also asks if the farmers will have control over application of sludge on their land and refers to Mitigation 2.2.1, stating that it implies the City of Santa Rosa will have control over irrigation management through ICMPs.

The impacts of disposing of the projected increase in sludge production from expansion of the headworks are addressed in the Santa Rosa Subregional Sludge Beneficial Use Project Environmental Impact Report (LSA 1991). The Biosolids Beneficial Reuse Project implements the use of sludge on applicable agricultural lands. Refer to these documents for information about sludge disposal. The disposal of sludge products is not a component of the Long-Term Subregional Wastewater Project, and therefore is not addressed specifically in the Draft EIR/EIS. Irrigators will be required to implement appropriate irrigation practices related to use of reclaimed water under Measure 2.2.1: Irrigation Conservation and Management Programs on page 2-21 of the Draft EIR/EIS.

Response to Comment 128-20

Comment Summary: The comment asks for a more complete description of contingency irrigation.

Dry winter contingency irrigation is described on pages 19 and 20 in Appendix D-19 (Irrigation Management Guidelines for the West County and South County Alternatives) of the Draft EIR/EIS. As described there, it is expected that "Most of the winter contingency irrigation will likely continue to occur on City-owned lands near the Laguna Treatment Plant site." If additional lands are identified as needed in the West County, the City will negotiate with individual landowners, who could be paid a small fee. Participation in the contingency program will be voluntary.

Response to Comment 128-21

Comment Summary: The comment asks how deficit irrigation would affect acreage of irrigation land needed for the project.

Deficit irrigation reduces the total amount of irrigation water applied per unit area, and thus increases the amount of land that can be irrigated. The use of deficit irrigation was assumed in calculating the acreage required for a West County alternative. Figures in Section 3.3 of the Draft EIR/EIS reflect this.

Response to Comment 128-22

Comment Summary: This comment states that the potential significant impact of contingency irrigation from copper in Stemple and Americano Creeks is unacceptable.

Mitigation Measure 2.5.2: Control Program for Dissolved Copper Levels on page 2-123 of the Draft EIR/EIS describes what steps will be taken to insure no significant impact of copper will occur (including preventing contingency discharges during times when impacts may occur).

This comment also states that Impact 6.7.3 on page 4.6-89 of the Draft EIR/EIS says that salinity, ammonia, dissolved oxygen, planktonic algae, benthic algae, and metals will be exceeded and are not acceptable impacts. Impact 6.7.3 actually states that agricultural irrigation will cause the special site criterion to be exceeded. The impact of the Project on the special site, the Gulf of the Farallones National Marine Sanctuary (NMS), was considered significant to be consistent with the Sanctuary's interpretation of NMS regulations to prohibit any impact, not because the expected impact will adversely affect the resources of the NMS. Refer also to Response to Comment 12-25.

Response to Comment 128-23

Comment Summary: The comment states that the effectiveness of the filter strip component of Measure 2.2.4 for erosion mitigation has not been established, and the location of filter strips has not been established.

Filter strip effectiveness depends on the slope, width and vegetation of the strip, as well as the distribution of flow across the strip. Measure 2.2.4: Restrict Soil Erosion and Sediment movement on page 2-26 cites the filter strip design criteria of the United States Department of Agriculture Conservation Reserve Program (USDA), which is considered by the Draft EIR/EIS authors to be an authoritative design basis. USDA guidance specifies design parameters to achieve the desired effectiveness for sediment removal. The comment provides no evidence that the mitigation will be ineffective in the Project area. Filter strips will be located where needed to protect the stream from sediment, and where site conditions are suitable, as described in Mitigation Measure 2.2.4.

The EIR/EIS authors consider most of the Project area to be suitable for vegetative filter strips (i.e., slope and width within the parameters established in the USDA guidance). The description of Measure 2.2.4 is modified below to address how sediment will be controlled at locations where sediment has the potential to reach a stream and site conditions are unsuitable for filter strips. Refer also to Response to Comment 5-30.

The following changes is made to the Draft EIR/EIS:

Page 2-26. The seventh paragraph is revised as follows:

Where sediment has the potential to reach a stream or other [water](#) body, the City of Santa Rosa will implement filter strips in accordance with design criteria and procedures outlined in US Department of Agriculture Conservation Reserve Program ([CRP](#)). Filter strips consist of strips of land located along stream courses or water bodies that are designed to passively filter sediment, nutrients and pesticides from runoff water. Where sediment has the potential to reach a stream or other water body and the riparian corridor associated with the site is unsuitable for filter strips according to CRP guidance, the City of Santa Rosa shall impose additional land management restrictions as necessary to avoid increased sediment transport to the creek. Such additional restrictions could include but are not limited to crop selection, cover crop requirements, and pasture management (stocking rates, plant residue requirements, cross-fencing, and rest-rotation schedule).

Response to Comment 128-24

Comment Summary: The comment suggests that the Sensitive Resource Conservation program is unrealistic.

Refer to Response to Comment 95-51.

Response to Comment 128-25

Comment Summary: This comment says that on page 4.6-154 in Section 4.6, the pump-back scheme below the reservoirs to intercept seepage is inadequately described.

A more complete description of Mitigation Measure 2.5.3: Control Program for Hydrogen Sulfide, Ammonia, and Dissolved Oxygen, which is designed to prevent significant impact from dam seepage, is found on page 2-125 of the Draft EIR/EIS. A method to pump creek flows resulting from irrigation is described on page 225 in Appendix I-16 (Water Quality Impact Analysis Volume I - Text) of the Draft EIR/EIS and is considered infeasible.

Response to Comment 128-26

Comment Summary: The comment asserts that Volume III states that there will less than significant traffic impacts at the Two Rock storage reservoir site and adjoining roads even though the construction of the storage reservoir will require the importation of over 11,000 loads of fill.

Contrary to the comment, in Table 4.11-9 on page 4.11-36 and in the discussion of Impact 11.5.1 on page 4.11-37 of the Draft EIR/EIS, the traffic analysis found that significant impacts due to storage reservoir component construction traffic will occur at the Two Rock storage reservoir site as well as all Alternative 2 and 3 storage reservoir sites. No feasible mitigation has been identified to reduce these impacts.

Response to Comment 128-27

Comment Summary: The comment states that construction noise will be very significant.

The comment agrees with the Draft EIR/EIS conclusion.

Response to Comment 128-28

Comment Summary: The comment states that visual impacts of the Two Rock dam will be significant, and that Mitigation Measure 2.4.77 (apparently referring to Mitigation Measure 2.4.7) which provides for screening of project facilities fails to make the impact less than significant.

The comment appears to be based upon a misunderstanding of Mitigation Measure 2.4.7: Establish Tree Screening as proposed. Section 4.14 of the Draft EIR/EIS (pages 4.14-46 and 4.14-83) states the proposed mitigation will reduce the visual contrast of the dam to a level less than significant, but also concludes that the impacts of view obstruction by the dam cannot be mitigated and therefore visual impacts on private residences are significant and unmitigable for the Two Rock site.

Response to Comment 128-29

Comment Summary: The comment requests consideration of smaller sites with willing sellers.

Refer to Master Response 14, located in Section 6.2 of this document, regarding the use of smaller reservoir sites.

The City of Santa Rosa would prefer the use of reservoir sites with willing sellers, although it is not certain that this will be possible. In either case, the Draft EIR/EIS presents the environmental impacts of the Project.

Response to Comment 128-30

Comment Summary: The comment states that landowners in the west county area have had to deal with potential condemnation of their property for several years under different projects. The remainder of the comment consists of a statement of the philosophy of the commentators.

Because the comment does not address the adequacy of the analyses or information within the Draft EIR/EIS, no specific response is possible.

Response to Comment 128-31

Comment Summary: This comment consists of an article from The Press Democrat entitled "Woman swept away by dam break" (March 15, 1996), used as an attachment to Comment Letter 128.

The comment is apparently expressing concern regarding safety of dams. The potential for dam failure is discussed in Section 4.19 of the Draft EIR. Refer to Response to Comment 93-6 for additional discussion of dam safety.

Response to Comment 128-32

Comment Summary: The comment consists of a typewritten sheet entitled "Faculty Interest in Button Ranch Reserve," attached to Comment Letter 128 and referred to in Comments 128-3 and 128-24.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-33

Comment Summary: The comment consists of an article from The Press Democrat entitled "Ranchers try to block SR dam for wastewater" (March 16, 1994), attached to Comment Letter 128 and referred to in Comments 128-3 and 128-4.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-34

Comment Summary: The comment consists of an article from The San Francisco Examiner entitled "Regents hold key to Sonoma growth" (March 17, 1994), attached to Comment Letter 128 and referred to in Comments 128-3 and 128-24.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-35

Comment Summary: The comment consists of an article from The San Francisco Examiner entitled "UC Regents to decide on Sonoma land's future" (March 17, 1994), attached to Comment Letter 128 and referred to in Comments 128-3 and 128-24.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-36

Comment Summary: The comment consists of a photograph and caption from the Bodega Bay Navigator entitled "Button Ranch celebration a huge success", attached to Comment Letter 128 and referred to in Comments 128-3 and 128-24.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-37

Comment Summary: The comment consists of an article from The Press Democrat entitled “Opponents buy key SR wastewater site” (December 20, 1995), attached to Comment Letter 128 and referred to in Comments 128-3 and 128-24.

Refer to Responses to Comments 128-3 and 128-24.

Response to Comment 128-38

Comment Summary: The comment consists of an article from California Farmer entitled “You don’t have 20 more years to wear us down” (June 1995), attached to Comment Letter 128 and referred to in Comment 128-5.

Refer to Response to Comment 128-5.

Response to Comment 128-39

Comment Summary: The comment consists of a copy of the Superior Court of the State of California petition and order to 24 landowners to attend a hearing (January 13, 1995), attached to Comment Letter 128 and referred to in Comment 128-5.

Refer to Response to Comment 128-5.

Response to Comment 128-40

Comment Summary: The comment consists of a political cartoon from the Sonoma County Independent (August 13, 1995), attached to Comment Letter 128 and referred to in Comment 128-5.

Refer to Response to Comment 128-5.

Response to Comment 128-41

Comment Summary: The comment consists of articles from the Point Reyes Light entitled “Santa Rosa sewage flap” (April 13, 1995) and from The Press Democrat entitled “SR won’t rule out seizing property” (April 6, 1995), attached to Comment Letter 128 and referred to in Comment 128-5.

Refer to Response to Comment 128-5.

Response to Comment 128-42

Comment Summary: The comment consists of a copy of the front page of the Notice of Rejection from the Agricultural Property Rights Alliance which includes a map depicting properties, attached to Comment Letter 128 and referred to in Comment 128-6.

Refer to Response to Comment 128-6.

Response to Comment 128-43

Comment Summary: The comment consists of the Agricultural Property Rights Alliance Notice of Rejection petition with the names of landowners, attached to Comment Letter 128 and referred to in Comment 128-6.

Refer to Response to Comment 128-6.

Response to Comment 128-44

Comment Summary: The comment consists of a letter, dated February 15, 1995, from Vic Allcorn, Director of Rehabilitation Services, St. Anthony Foundation, to the City of Santa Rosa, attached to Comment Letter 128 and referred to in Comment 128-6.

Refer to Response to Comment 128-6.

Response to Comment 128-45

Comment Summary: The comment consists of a letter, dated February 28, 1995, from the West County Agriculture for Treated Effluent Reuse to Ed Brauner, Assistant City Manager, City of Santa Rosa, attached to letter 128 and referred to in Comment 128-6.

Refer to Response to Comment 128-6.

Response to Comment 128-46

Comment Summary: The comment consists of "Technical Memorandum No. 1, Joe Tresch Property - Initial Geologic Reconnaissance" (Rogers/Pacific 1990), attached to Comment Letter 128 and referred to in Comment 128-7.

Refer to Response to Comment 128-7.

Response to Comment 128-47

Comment Summary: The comment consists of a map depicting trench locations and fault locations from "Technical Memorandum No. 1, Joe Tresch Property - Initial Geologic Reconnaissance" (Rogers/Pacific 1990), attached to Comment Letter 128 and referred to in Comment 128-7.

Refer to Response to Comment 128-7.

Response to Comment 128-48

Comment Summary: The comment consists of a copy of a section of a U.S.G.S. topographic map depicting the Two Rock valley dam configurations for variously proposed projects, attached to Comment Letter 128 and referred to in Comment 128-9.

Refer to Response to Comment 128-9.

Response to Comment 128-49

Comment Summary: The comment consists of a copy of a section of a U.S.G.S. topographic map depicting the Two Rock valley dam configurations for variously proposed projects, attached to Comment Letter 128 and referred to in Comment 128-9.

Refer to Response to Comment 128-9.

Response to Comment 128-50

Comment Summary: The comment consists of a copy of a section of a U.S.G.S. topographic map depicting the Two Rock Valley dam configurations for variously proposed projects, attached to Comment Letter 128 and referred to in Comment 128-9.

Refer to Response to Comment 128-9.

Response to Comment 128-51

Comment Summary: The comment consists of a report entitled "Stemple Creek Rare Invertebrate Survey" by Larry Serpa (May 20, 1991), attached to Comment Letter 128 and referred to in Comment 128-14.

Refer to Response to Comment 128-14.

Response to Comment 128-52

Comment Summary: The comment consists of a report entitled "Further Work on the Distribution of the California Freshwater Shrimp" by Larry Serpa (September 4, 1991), attached to Comment Letter 128 and referred to in Comment 128-14.

Refer to Response to Comment 128-14.

Response to Comment 128-53

Comment Summary: The comment consists of a map entitled "City of Santa Rosa Wastewater Project, Walker Road (University of California) Site - rare, threatened, and endangered species of freshwater crustacea on site," attached to Comment Letter 128 and referred to in Comment 128-14.

Refer to Response to Comment 128-14.

Response to Comment 128-54

Comment Summary: The comment consists of a copy of a page from The Press Democrat listing the top five dairies in Sonoma County for 1996, attached to Comment Letter 128 and referred to in Comment 128-15.

Refer to Response to Comment 128-15.

Response to Comment 128-55

Comment Summary: The comment consists of an article from the AG Alert entitled “New law may prevent farmland seizures” (October 2, 1996), attached to Comment Letter 128 and referred to in Comment 128-16.

Refer to Response to Comment 128-16.

Response to Comment 128-56

Comment Summary: This comment consists of a copy of a page from The Press Democrat listing the top five dairies in Sonoma County for 1993, attached to Comment Letter 128 and referred to in Comment 128-15.

Refer to Response to Comment 128-15.

