

**This letter was resubmitted as letter 305.
Please refer to letter 305 for additional comments.**

Oct. 7, 1986 pg 1

City of Santa Rosa Fax # 543-3218 Marie
 Accuracy of the E.I.R.
 Sept. 24, 1986

Becky Lepori
 6800 Gericke Rd.
 Petaluma, Ca. 94952

Public Hearing/Finley Center

Vol. II "Affected Groundwater" 4.5.5

001

"predictable quantities of groundwater for the west county irrigation sites is contiguous and detached groundwater in Sonoma and Marin counties are based on various reports by the Calif. State Dept. of Water Resources 1975, 1982a, and b, and 1987 which are the most current."....There have been numerous floods since 1987, and in many places there has been filling, and widening of the Americano creek, landslides on surrounding hills; exposing new water sources that ultimately will effect the facts contained in these reports that are 9 years old. My first question to you is what mitigation is in place to secure the effects on the environment due to the changes that have occurred over the past 9 years?

Vol. III 4.9.21 pp3

002

"Waters near shore provide foraging habitat for waterfowl, Herons, Shorebirds, and belted Kingfisher."....which are birds that feed from the rivers and creeks, and on the fish that return to the ocean where they become a part of our food supply by commercial fishermen. Earlier today, I went to a safety supplier and asked the vendor if he had anything pertaining to water. He showed me the sign the City of Santa Rosa contracted him to make for them to put around their existing reclaimed wastewater. (No swimming, drinking, or fishing pictorial) If the E.I.R. passes, will our commercial fishermen see these signs along the coast of Marin and Sonoma counties because of the water seepage from irrigation sites into the Stemple and Americano creeks?

My last issue and concern to bring up is the actual volume of water contained in the surrounding hills, and their effect if a reservoir is put in an adjoining valley, or their affects on the aquifers when the area of output has been saturated with waste-water. [Though it has been difficult to get access to an E.I.R., when I have, I have only found this topic covered briefly. Groundwater wells have been discussed extensively, but the issue of side hill wells and actual volume of water, I cannot find much. I am concerned because our ranch has numerous artesian wells in these hills that have been active since the ranch's existence over the past 100 years.] In the past six years we have activated 3 additional wells to increase water supply to our animals, but to also relieve water pressure/mounding, to control; landslides, and the negative effects brought on by erosion. Discussion of rock and soil type has also been reported proving that water can be found, but prove to me that the City of Santa Rosa knows about the true volume of water in the west county hills, and what affect these volumes would have on the implementation of the west county alternative.

003

004 005

006

October 7, 1986 pg. 2

Throughout the E.I.R. it states one of the mitigating factors is a "No Alternative" alternative. One of the guidelines under the "No Alternative" alternative is that the city continues with its existing water conservation practices thereby reducing wastewater flow. (leaving the Laguna plant) <u>Why isn't this practice included in the guidelines for all other alternatives?</u> <u>Wouldn't this insure lower cost for everyone involved?</u> Without strict water conservation practices being implemented as a part of the other alternatives, what kind of revenue is the city seeking to claim from the high volume of 'product' the city will have due to the implementation of those other alternatives? The cost of construction is going to be passed on to the rate payers, but how is the revenue from hook-ups, and any other charges the city will receive be distributed? The same question again, but over a 5,10,20, and 20+ year plan?	007 008 009 010
Vol. VII N(?)	011
During construction is the amount of asphalt being torn up during pipe-line laying going to be stored on site or is it being hauled to a central location? Isn't such a volume of tar and asphalt considered to be hazardous material? What about recycling-is this a possibility? Will there be revenue for the city through the recycling of asphalt? If there is, will it be passed on to the rate payers, or property owners?	012 013
Will the property owner be responsible for the stock piling during excavation? What I have read of this section, I did not see answers to these questions.	014
Questa Engineering May 28, 1986 pg 3 pp.1 last two sentences.	015
"Inclusion of Sebastopol lands (2200 acres) may be required for this alternative to be successful if the project (West County irrigation) evolves over time to one or more intensively farmed fruit and vegetable crops for the one-percent river discharge alternative. Higher river discharge alternatives reduce the irrigation land requirements correspondingly." ...1. This implies that west county will evolve from dairies, sheep, and beef farms to farmed fruits and vegetables. This is an inaccurate statement.	
This paragraph should be defined as 'the west county will be FORCED to change to more intensively farmed fruit and vegetable crops....' 2. If stricter water conservation practices were in the place under this alternative, why would higher river discharge still have to take place?	016 017
pg.5 pp.1 last two sentences.	018
What are the numbers of owners who denied entry for studies? What are the acres involved of denied access? The incompleteness of these studies should be a very important criteria for the inaccuracy of this E.I.R. Another inaccuracy is the fact that photo interpretation doesn't cover on site (nor roadside) studies, or the years of knowledge possessed by each individual landowner. It is their knowledge of the land, water, soil, and seasonal patterns that govern their day to day lives, and businesses. They know more about their piece of property than the city has printed in some of their studies. Important facts are missing.	019 020
p2.2.1 2nd paragraph	021
"to produce revenue to offset those production cost borne directly by the water user" For many of the businesses currently in place, the revenue they are taking in is because of a working relationship with their property that has evolved over many years. If their land were to be abused, their revenue would then go down. The implementation of the West County alternative would force a change that would take years to establish itself fiscally. Will the City of Santa Rosa subsidize the landowners for the loss of income due to the construction of/or implementation of the West County Alternative?	022

October, 7, 1986 pg. 3

Questa Engineering May 28, 1986 pg. 8 pp3.

At what time of year was this study done? What are the acres involved? The total 023 024
 acre value of the 'occasionally occurring wetland' characteristics are important 025
 facts that should be included. The volume could play an important role in the imple- 026
 mentation of pasture irrigation, and soil saturation.

page 10 pp4 027

Where are the studies that support this statement? Where is the proof that one isn't
 possible? "The lack of a developed, dependable, and inexpensive water supply...." 028
 implies that one cannot be done without the City of Santa Rosa's reclaimed water. Where
 is the actual proof that the City has checked other than at Two Rock's dry wells? 029
 As for the statement of inexpensive water supply, what would the actual cost be to
 the water user? What governing body would control the pricing, and supply? What 030 031
 controls would be in place to protect the initial user for their supply quantity if their
 became a greater demand for the water in a more financially backed county or city?
 The issue of supply and demand is a current headache current users/buyers along the 032
 State of California have. Once again, describing the 'gently sloping valley bottom 033
 lands and the cool coastal climate'...does not offer facts to proving the volume of
 water already existing in the surrounding hillsides. This untapped water source could be
 an excellent source of revenue for each of the individual landowners if they wished
 to pursue it.

page 12, pp5 034

"...dependable source of irrigation water". There again, there is not adequate proof that
 one does not exist. "There is a high risk of crop failure or reduced yields in many 035
 areas with poor drainage conditions, particularly following wet springs." If the wet
 spring seasons can damage the crops, how does a dependable water source (Santa Rosa
 wastewater) better the situation and market conditions? At least now, property owners are 036
 able to work with the changes in weather. The city's waterflow will go from continual
 to constant. Where the supply of water is greater than the need, the E.I.R. already 037
 states that land will be condemned for irrigation sites. Which will render the land
 unuseful to the owner.

page 13, pp1 038

This paragraph is inaccurate. At other points in the E.I.R. it states what areas will
 be needed to be converted into irrigation pasture. So this sentence should read, 039
 "will be converted into permanent irrigated pasutre", instead of 'can be'. As for the
 rest of this paragraph, wouldn't this render most lands unuseable do to the incomp- 040
 atability of heavy animal traffic during heavy irrigation times. Furthermore,
 wouldn't supplemental feed costs rise during a reduction in total pasture availability? 041
 Or, in cases where the property owner may not have enough acreage to implement rotation- 042
 al pasturing? And who will pay for the cost of the perimeter fencing and cross fencing?

pp. 4 043

This doesn't include the option, or give adequate room to continue with current crops that
 are now being utalized by the property owner.

page 18, pp2, & 4, page 19 pp5 044

Page 18's comments totally contradict the projected plan on page 19. "irrigation
 efficiency really means 'inefficiency'." "Typical efficiencies for sprinkler irrigation
 range from 60 to 80 percent...." Page 19.. "Based on a sprinkler irrigation system
 efficiency of 80 to 85 percent." Due to the earlier facts, sprinkler irrigation in the
 west county would be totally ineffective.

cond.

October 7, 1986 pg.4

cónd. from page 3

" .. wind drift that occur after water leaves the sprinkler head." Wind in the west county is daily. Where is the study on this? Have you asked current irrigators (using private water) in west county how much water is lost, or how many irrigation days are lost, due to the wind? 045 046

page 20 top sentence 047

Current water users of the existing reclaimed wastewater system operate their businesses in a totally different area, and environmental conditions than property owners in west county. How can their statistics be applied accurately?

page 21 pp6 048

This contradicts the "no crop restriction" previously committed on page 14 and 15. Also, where is the proof this 1yr out of 5 or 7 yr. problem will fix itself in that time? Where are the controls for neighboring sites not to effect the "dry year" re-establishment? What about the financial loss for that time frame to the property owner? (Which they are now accustomed to getting because of the City of Santa Rosa) Will the City of Santa Rosa financially compensate the owner for the loss of standard income they committed to the landowner through the facts stated in this E.I.R. ('more revenue')? How many years will it take to establish a change of farming to where it is operating in the 'black' upon conversion to the plans suggested in this E.I.R.? 049 050 051 052 053

page 23 pp1 054

Where are the case studies of this actually working in the soil areas matching that of west county? If they cannot be found, how can project implementation prove itself accurate and effective?

pp2 055

At what cost? Who pays? How does this effect the cost handed down to the rate payer?

pp4 056

What mitigation and compensation is in place for the diminishing effect on the local productivity of agriculture?

pp5 057

Most of these practices would be implemented after the water presented itself to seen and un-forseen problem areas. Which is a problem chasing tactic versus a problem detourant tactic. What controls are in place, and what personnell capacity does the city of Santa Rosa have set up to chase and solve all the problems that surface upon implementation of any one of their 'plans'? 058

October 7, 1986 pg. 5

Questa Engineering.

Irrigation Suitability
Potential Crops

The facts contained in these reports strongly insinuate the 'west county would prosper' and have the potential to become a more economically viable area if it were to utalize the City of Santa Rosa's reclaimed wastewater. Current agricultural practices would ultimately be replaced by 'high-tech' and intensive fruits and vegetable farming. This evolution would take place out of bureaucratic enforcement, instead of through the property owners rights and choices. The previous E.I.R. referred to the west county as the West County Option. This time around we are referred to as the "alternative". Which truly defines the lack of open options.

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060

061

To label the agricultural developement as constrained due to the lack of a dependable watersource in the west county totally denies the current economic vitality of this area.

062

The following figures were based on averages of the Cost of Production figures calculated from 22 dairies surveyed in Sonoma county and 2 on the border of Sonoma/Marin county by the Cost of Production Unit, Dairy Marketing Branch, California Dept. of Food and Agriculture, 1220 N St. Sacramento California. (This obviously does not represent the economic value to all of the other many specialty crops and businesses that make Sonoma and Marin counties so famous around the world)

063

Sonoma County (and two dairies on the county line)

Grade A dairies -- 100.

Grade B dairies -- 2

of cows 30,817 (avg. per dairy 302)

Total milk prod/yr 610,205,551 pounds !!!

There are 282 employees employed strictly to service the milking cows with another 100 employees that do outside work. The average monthly salary is \$1325 with another \$460 for perks, housing, utilities, meat, insurance and other misc. items.

Average feed cost

\$ 21,000,000/year

90% is purchased in So. Co.

Hay purchases

\$ 14,000,000/year

Wet roughage (grown or bought)

\$ 4,250,000/year

Gallons of milk

6,000,000/month

Berkely Farms, Sunnyside, Clover have contracts exclusively with dairymen in these counties for their BST free milk, and state so in their worldwide advertising.

Products are produced through 1 fluid milk plant, 9 manufacturing plants, 8 cheese only plants, 1 butter plant and 1 powder plant in Sonoma county.

\$1,000,000 a month is spent in Sonoma county on all outside service: operating costs, utilities, vet-meds, breeding, bookkeeping, legal, bedding, repairs, barns, corrals, that are dairy specific.

\$1000.00 per cow is spent as a one time investment in the milking barn, corrals, freestall barns, and anything pertaining strictly to the production of milk. This does not include any expenses for fence repairs or any of the expenses associated with the raising of heifer calves.

This a fiscal look at just one industry in Sonoma county that not only contributes directly, but indirectly through its employees and their families. Also monies are brought in through worldwide sales of their special products.

cond.

October 7, 1986 pg6

An interruption in the agricultural community of Sonoma and Marin counties of any magnitude, let alone the magnitude the City of Santa Rosa wishes to impose, would have catastrophic impacts on the County as a whole.

This E.I.R. is filled with "assumptions", "maybe's", "would be's", "could do", "additional studies needed", and many more empty statements combined with partial reports. The mitigation factors read about the same way. The city of Santa Rosa isn't even sure implementation will effectively work during construction or operation by their frequent use of empty statements printed in this E.I.R. .

So my last question is how can this open admittance of inaccuracy be certified as accurate?

OCT-07-96 MON 03:22 PM TRESCH DAIRY INC.

707 762 1710

P.01

①

CITY OF SANTA ROSA

543-3218

TO MARIE:

TO SUBMIT ON TIME, HERE IS
THE ROUGH COPY. AND EDITED
VERSION WILL FOLLOW W/IN 24hrs.

BECKY LEPORTI.

6pgs

#111

63 ATCH
NC

City of Santa Rosa
Accuracy of the E.I.R.
Sept. 24, 1986

Becky Lepori
6800 Gericke Rd.
Petaluma, CA. 94952

Public Hearing/Finley Center

Vol II "Affected Groundwater" 4.5.5

"...predictable quantities of groundwater for the west county irrigation sites is contiguous and detached groundwater in Sonoma and Marin counties are based on various reports by the Calif. State Dept. of Water Resources 1975, 1982a and b., and 1987 which are the most current."...There have been numerous floods since 1987, and in many places there has been filling, and widening of the Americano creek, landslides on surrounding hills, exposing new water sources that ultimately will affect the facts contained in these reports that are 9 years old. My first question to you is what mitigation is in place to secure the effects on the environment due to the changes that have occurred over the past nine years?

My second question pertains to facts listed in Vol. III sec. 4.0.21 ppi.

"Waters near shore provide foraging habitat for waterfowl, Herons, shorebirds, and Belted Kingfisher."...which are birds that feed from the rivers and creeks, and on the fish that return to the ocean where they become a part of our food supply by commercial fisherman. Earlier today, I went to a safety supplier and asked the vendor if he had anything pertaining to water. He showed me the sign the City of Santa Rosa contracted him to make for them to put around their existing reclaimed wastewater. (No swimming, drinking, or fishing pictorial) If the E.I.R. passes, will our commercial fishermen see these signs along the coast of Marin and Sonoma counties because of the water seepage from irrigation sites into the Stemple and Americano creeks?

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③

Throughout the E.I.R. it states one of the mitigating factors is a "No Alternative" alternative. One of guidelines under the "No Alternative" alternative is that the city continues with its existing water conservation practices thereby reducing wastewater flow (leaving the Laguna plant). Why isn't this practice included in the guidelines for all other alternatives. Wouldn't this insure lower cost for everyone involved? Without strict water conservation practices being implemented as a part of the other alternatives, what kind of revenue is the city seeking to claim from the high volume of product? The city will have due to the implementation of any of the other alternatives (other than No Alternative) the cost of construction is going to be passed on to the rate payers, but how is the revenue from hook-ups, and any other charges the city will receive be distributed? The same question again, but over a 5, 10, 20, and a 20+ year plan?

Vol. VII N (?)

During construction is the amount of asphalt being torn up during pipe-line laying going to be stored on site or is it being hauled to central location? Isn't such a volume of tar and asphalt considered to be hazardous material? What about recycling is that a possibility? Will there be revenue for the city through the recycling of asphalt? If there is, will it be passed on to the rate payers, or property owners? Will the property owner be responsible for the stock piling during excavation?

What I read of,

Questa Engineering May 28, 1996 pg. 3 1st paragraph, last two sentences.

"...Inclusion of Sebastapol lands (2,200 acres) may be required for this alternative to be successful if the project (West County irrigation) evolves over time to one or more intensively farmed fruit and vegetable crops for the one-percent river discharge alternative. Higher river discharge alternatives reduce the irrigation land requirements correspondingly."... 1. This implies that west county will evolve from dairies, sheep, and beef farms to farmed fruits and vegetables. This is an inaccurate statement. This paragraph should be defined as 'the west county will be FORCED to change to more intensively farmed fruit and vegetable crops...' 2. If stricter water conservation practices were in place under this alternative, why would higher river discharge still have to take place if beginning users of water were restricted/monitored before the water reaches the plant at Laguna?

page 5 1st paragraph, last two sentences.

What are the numbers of owners who denied entry for studies? What are the acres involved of denied access? The incompleteness of these studies should be a very important criteria for the accuracy/inaccuracy of this E.I.R. Another inaccuracy is the fact that photo interpretation doesn't cover on site (nor roadside) studies, or the years of knowledge possessed by each individual landowner. It is their knowledge of the land, water, soil, and seasonal patterns that govern their day to day lives, and businesses. They know more about their piece of property than the city has printed in some of their studies. Important facts are missing.

Sect. p2.2.1 2nd paragraph

"...to produce revenue to offset those production cost borne directly by the water user". For many of the businesses currently in place the revenue they are taking in is because of a working relationship with their property that has evolved over many years. If their land were to be abused, their revenue would then go down. The implementation of the West County alternative would force a change that would take years to establish itself fiscally. Will the City of Santa Rosa subsidize the landowners for loss of income due to the construction of/or implementation of the west county alternative?

October 7, 1986

(4)

Questa Engineering May 28, 1986 Pg. 8 PP. 3

At what time of year was this study done? What are the acres involved? The total acre value of the 'occasionally occurring wetland characteristics' are important facts that should be included. The volume could play an important role in the implementation of pasture irrigation, and soil saturation.

Page 10 pp. 4

Where are the studies that support this statement? Where is the proof that one isn't possible? "The lack of a developed, dependable, and inexpensive water supply" doesn't mean it can't be done without Santa Rosa's Reclaimed Wastewater, or succeed past the City's implication that nothing else is better than Santa Rosa's sewer water. As for the statement of inexpensive water supply, what would the actual cost be to the water user? What governing body would control the pricing, and supply? What controls would be in place to protect the initial user of their supply if there became a greater demand for the water in a financially backed county? All of these are headaches the current users along the central California coast were effected by after they committed to using it. Also ...describing the 'gently sloping valley bottom lands and the cool coastal climate...does not offer facts to the volume of water already existing the surrounding hillsides. This water source could be an excellent source of revenue for the individual landowners if they wished to pursue it.

Page 12, pp.5

..dependable source of irrigation water" There again, there is not adequate proof that one does not exist. "There is a high risk of crop failure or reduced yields in many areas with poor drainage conditions, particularly following wet springs." If the wet spring seasons can damage the crops, how does a dependable water source (Santa Rosa wastewater) better the situation, and 'market conditions'? *At least now property owners are able to work w/ the weather changes & weather. The city's water flow will go from continual to constant.*

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pp. 4

This doesn't include the option, or give adequate room to continue with current crops that are now being utilized by the property owner.

Page 18, pp. 2, & 4, Page 19 pp.5

Page 18's comments totally contradict the projected plan on page 19. "Irrigation efficiency really means 'inefficiency'..." "Typical efficiencies for sprinkler irrigation range from 60 to 80 percent..." Page 19..."Based on a sprinkler irrigation system efficiency of 80 to 85 percent." Due to the earlier facts, sprinkler irrigation in the west county would be totally ineffective. "...wind drift that occur after water leaves the sprinkler head." Wind in the west county is daily. Where is the study on this? Have you asked current irrigators (using private water) in west county how much water is lost, or how many irrigation days are lost due to the wind?

October 7, 1986

(5)

Questa Engineering May 28, 1986 Page 20

top sentence

Current water users of the existing reclaimed wastewater system operate their businesses in totally different areas, practices, and environmental conditions than property owners in west county. How can their statistics be applied accurately?

Page 21 pp. 6

This contradicts the "no crop restriction" previously committed on page 14 and 15. Also, where is the proof this 1yr./5or7 yr. problem will fix itself in that time? Where are the controls for neighboring sites not to effect the "dry year" re-establishment? What about the financial loss for that time frame to the property owner? Will the City of Santa Rosa financially compensate for the loss of standard income they committed to the landowner through the facts stated in this E.I.R.? How many years will it take to establish a change of farming to where it is operating in the 'black' upon conversion to the plans suggested in this E.I.R.?

Page 23 pp. 1

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XX

To label the agricultural development as constrained due to the lack of a dependable water source in the west county) totally denies the current economic vitality of this area. In Sonoma county there are 100 grade A dairies and 2 Grade b dairies with the number of cows totalling 30,817 respectively. With an average of 302 cows per dairy. The total milk production per year in Sonoma County is 610,205,551 pounds. The number of employees for just the milking cows is roughly 282 with another 100 employees for outside work and repairs. The average salary is \$1325/mo with another 460 dollars in perks, housing, utilities, meat, insurance, etc. The Feed cost per year runs around \$21,000,000 with 90% buying their feed in Sonoma County. Hay purchases run around \$14,000,000. wet Roughage \$4,250,000 is grown or bought. 6,000,000. gallons of milk per month are produced. Berkely farms , Sunnyside, and Clover exclusively have contracts with dairymen in Sonoma County for their B.S.T. free milk, and use this in their advertising. Hunt & Behrens a Petaluma based feed/grainery sustains itself mainly on business from the West county dairymen. Also each rancher has spent an average of 1,000,000. per cow in the county for operatingco