

**CITY OF SANTA ROSA**  
P.O. Box 1678  
Santa Rosa, CA 95402

1

OCT 04 1996

9/17/96

Dear Ms. Meredith:

**DEPARTMENT OF  
COMMUNITY DEVELOPMENT**

Please include the following six pages in the comment and response document to the EIR. Thank you.

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The West County Alternative is an irrigation project. If it is to be feasible it requires irrigators. 001

The EIR devotes significant space discussing the feasibility and cost of obtaining about 300 acres for a reservoir site. It all but ignores the 6500 acres required for the irrigation component.

Section 3.1, page 36 and D06, page 25 of the EIR state that one of the primary reasons why the Chileno Valley Irrigation Proposal was not pursued was because of a lack of landowner interest.

It then cites a preliminary survey of landowners conducted by Harland Bartholomew that identified 3,450 acres of willing irrigators in the West County. There are no documents in the EIR to support this survey.

The city has used this 3000 acre figure to justify the West County Alternative to the public. Those 3000 acres of willing irrigators are a fiction.

That survey, conducted in 1994, consisted of a letter informing landowners that their property was being studied for a possible wastewater irrigation project, and a return postcard asking them if they wanted more information. The postcard clearly shows that those who responded were asking for information- they were not signing up to be irrigators. (I can provide copies of the letter and postcard at your request)

Early in 1995, the Agricultural Property Rights Alliance conducted their own survey in the form of a petition. The landowners who signed the document represent almost 26000 acres in the West County, completely blanketing the project area. They state that they will not accept the wastewater for irrigation. (I can provide a copy of this document at your request- the Mayor and City Manager have already received copies.) 002

Assistant City manager Ed Brauner has stated several times in public that, "If there are no irrigators, there is no project."

The petition clearly demonstrates that the West County Alternative is an irrigation project that has no irrigators. To paraphrase Mr. Brauner- Since there are no irrigators,

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The petition should have been included in the EIR since it goes to the heart of feasibility and costs.

On March 8, 1995, representatives of the APRA personally presented the petition to City Manager Ken Blackman and Mr. Brauner in the City Manager's office. However, the city ignored it and proceeded to take West County landowners to court on two occasions to forcibly gain access to their properties to conduct the studies.

The City has known since at least March of 1995, before most of the studies were begun, that the West County Alternative has no support in the West County- yet they have spent millions and millions of public dollars on studies and kept West County landowners under the threat of condemnation for over two years.

In order to complete the project, the City would have to condemn land for a reservoir, for irrigation land, for pipeline and power line right-of-ways, for pump stations, and for access roads. They would have to condemn about 10 to 15,000 acres. This would add about 50 million dollars to the price tag and force ranchers and dairymen from their homes and ranches.

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None of this information is included in the EIR, making it is impossible for city officials or the public to make an informed decision regarding the West County Alternative. Therefore the EIR is incomplete, misleading, and inadequate.

2.

Final Biological Resources Technical Memorandum- Volume 1, A-12

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The Carroll Road Wildlife Species List is incomplete and inadequate. No attempt was made to contact the owners or manager regarding the wildlife they know to exist on the site. Jim Jacobs, Manager for Boothe Ranch, sent a bird species list to Joyce Hunting at HBA but it was not referred to or included in the studies. Since this is a reservoir site that would destroy habitat, all possible species should have been reported. No attempt is made here to list all species, just those commonly seen.

The following **amphibians** were not on the list and are common on the site:

1. California Newt
2. Slender Salamander

The following **birds** were not on the list and are commonly seen on a daily to monthly basis or in large numbers at the appropriate time of year:

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These lists do not include accidentals or one-time observations.

Burrowing Owls have been seen irregularly over the past 15 years at three locations in the area. The last sighting was in 1994. This was noted in the EIR. However, since this species is known to exist on the Carroll Road site, more extensive studies should have been done. No one contacted Jim Jacobs to obtain information on observation dates or sites.

The following **Mammals** are not on the list but are commonly seen on the site:

1. Badger
2. Bobcat
3. Gray Fox
4. Weasel

These large mammals indicate the presence of many smaller mammal species on which they feed such as gophers, moles, mice etc.

The following **reptiles** are not on the list but are common to the site:

1. Gopher snake
2. Skink

3. Aquatic Life Survey Results, pg. 7 lists no Western Pond Turtles on the site. Page 2.3-58 lists 6 Pond Turtles.

These surveys are not reflective of the Western Pond Turtle population on the Carroll Road site. On the Boothe Ranch alone are two ponds, one with a population of at least 3 to 4 dozen turtles, and another with a population of at least 1 to 2 dozen. This does not include turtles found in the creeks or on the Renati property. Jim Jacobs talked with Joyce Hunting of HBA and the biologist in charge of the surveys and informed them of these facts but no follow-up studies were done and no mention of these facts is in the EIR.

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This site, according to the EIR, has more aquatic habitat than any other reservoir site in the west county. Red-legged frogs were found on the Valley Ford site, less than 1/4 mile away. Since the Carroll Road site has Red-legged frog habitat, a more thorough survey should have been undertaken or it should be noted that the frogs are probably present but not observed.] 008 (cont.)

When the biological studies on just this one site are so incomplete, what reason is there to assume that the biological studies for the entire EIR are at all adequate?] 009

5.  
Section 4.2, page 13 states that although Williamson Act lands would have to be condemned for a reservoir, on most of the sites the condemnation would not cause cancellation of the contracts. How can condemnation of any Williamson Act lands be in accord with the Sonoma County or Santa Rosa General Plans as shown on page 5, Section 4.2 which calls for "continued participation in the Williamson Act" and the "conservation and preservation of agricultural land?" 010

6.  
If, as the EIR contends, reservoir sites can be condemned even though they are in the Williamson Act, what about the necessary irrigation lands? No proof is offered as to the voluntary availability of irrigation land. Will condemnation be used to obtain enough acreage for irrigation- and if so, how will the Williamson Act be mitigated for those lands?] 011

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If irrigation lands are to be obtained through condemnation, how does removing agricultural lands from their present owners improve agriculture in the area?] 012

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Page 4.2-16 states that cancellation of Williamson Act contracts can be done for the reservoir sites since they are not prime farmland. How then can the EIR contend that the surrounding lands are farmland capable of growing competitive crops?] 013

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Page 4.2-15 states that cancellation of Williamson Act contracts is not for the purpose of unplanned urban development. The EIR states that a reservoir in the West County will pollute the wells and springs of the area and that mitigation would be to pipe in drinking water. If drinking water is piped to the area why then would unplanned development not take place?] 014

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and buildings would be destroyed by the reservoirs or what the effect would be on the existing ranches. For example, on the Carroll Road site 4 homes would be destroyed, including the 140 year old restored main house on the Boothe Ranch. Also destroyed would be an equestrian complex (including a 180 foot long indoor, lighted riding area with 8 attached stalls, tack room, storage room, wash rack, and two vehicle garage), a 75X240 foot outdoor area with irrigation, a well, two hay barns, complete cattle facilities including corrals, two large tractor and utility barns, a six car garage, and seven other barns and sheds. How could the Boothe Ranch continue as a viable ranch without the main house and livestock facilities? [The Renati dairy (one of the top ten in Sonoma County) would lose all of it's pastureland except for the steep hills and ridge tops. The dairy buildings (homes and all milking and feeding facilities) would be located directly at the base of the dam. How could that dairy possibly continue in operation?] 015(cont.) 016

A complete list of all homes and buildings destroyed as well as the impact upon the present ranches should be done for all reservoir sites. Just listing the acreage involved in condemnation does not tell the whole story. 017

11. Section E02, page 7 states that the West County is capable of receiving 23 inches of irrigation. The California Soils Survey shows that the West County soils become saturated at about 11 inches of irrigation or rainfall. How can 23 inches of irrigation be applied after an average winter of 33 inches of rainfall before the ground has dried? The grass remains green in the West County into June, showing that the ground does not dry out until then. 018

12. The 23 inch claim needs to be explained. All soil studies should be included in the EIR with an explanation of how the 23 inch figure was arrived at. [The studies also should include a survey of West County water tables since the amount of irrigation that can be applied is dependent upon the amount of moisture existing in the soil either from rain or ground water.] 019

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