

Date: Sun, 15 Dec 2013 21:20:59 -0800 (PST)
From: Robert Bonavito <robertbonavito@yahoo.com>
Subject: Fw: Cemetery Water Use
To: "telma.moreira@dcd.cccounty.us" <telma.moreira@dcd.cccounty.us>

Telma,

I have noticed something in the FEIR for the proposed cemetery regarding water that is incorrect.

The FEIR says (on page 2-3 or page 12 of the pdf) (I have added comments in the red highlighting):

"Land Use and Water Consumption: Commenters question the cemeteries land use compatibility based on its water consumption. The conclusions of the DEIR state that, based on available information and studies, this amount of water demand is not sustainable (see further discussion in the DEIR and in Master Response 2.2.5 on Hydrology and Water Quality). However, the irrigation demand for the project is addressed in the DEIR in Section 3.9, *Hydrology, Drainage and Water Control* and in Appendix D. Water demand for the Proposed Project is estimated to be approximately 45 acre feet/yr (AFY). The irrigation requirements of some other allowable agricultural operations of similar size could be roughly comparable to the project. **For example, both olives and vineyards(I am unaware of any vineyards) are located in the immediate vicinity of the site and their water demand is comparable to a cemetery.** There are other agricultural uses in the area, including irrigated and non-irrigated pasture. Table 2.2.1-2 provides irrigation demand estimates for agriculture related uses that are allowed under the Agricultural zoning (some would require a land use permit as does this use).

TABLE 2.2.1-2 COMPARISON OF WATER DEMAND FOR POTENTIAL AGRICULTURAL USE OF SITE (AT 58 ACRES OF USE)

Agricultural Use	Water Consumption/Units (AFY)
Olives	58
Stable	35
Vineyard	58
Mushroom Farm1	35

1Producing 1M lbs/year "

In other words, this section of the FEIR claims that the irrigation demand of the proposed cemetery is comparable to the water demand of your olive orchard, that the proposed 60+/- acre cemetery would use 45+/- AFY of water while my 58 acres of existing olives (Actually less than 30 acres) uses about 58 AFY. And therefore, since I am using 58 AFY for your olives, it would only be fair to allow the cemetery to use 45 AFY. This is totally wrong. I am dry farming approximately 35 acres of olive trees and clearly do not have enough water to properly irrigate my property.

I use less than 6.0 AFY.

(The underlying problem with the table is that the proposed cemetery requires 45+/- AFY from

wells to meet its water demand, while the 58 AFY shown in the table is the total water needed by my olives which is supplied by irrigation AND rainfall. The FEIR is comparing apples to oranges (maybe olives) here. The terms "Irrigation demand" and "Water demand" are used interchangeably in the FEIR, yet they have very different meanings.

I believe your analysis is wrong and misleading. I am dry farming, trucking water in, and do not have enough water to properly irrigate my property.
Please investigate and make the necessary changes appropriately.

Sincerely,
Robert Bonavito
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