

**COMMENT LETTER 13 - MARIN COUNTY COMMUNITY DEVELOPMENT AGENCY,  
CAROL WILLIAMS (OCTOBER 4,1996), RECEIVED OCTOBER 4, 1996**

**Response to Comment 13-1**

*Comment Summary: The comment states that the Marin County Board of Supervisors, during review of the 1991 EIR/EIS on a previous Long-Term Wastewater Project, passed a resolution against discharge of treated wastewater into the esteros, against increased discharge into the Russian River, and urged consideration of multiple storage sites and reclamation in Sebastopol, the West County (including Chileno Valley and portions of Marin), and the South County. The comment notes that the Draft EIR/EIS provides detailed evaluation of storage sites and agricultural irrigation, information that will provide the City of Santa Rosa with a basis for making decisions about the wastewater disposal system.*

As a result of the Scoping process undertaken for this Long-Term Project EIR/EIS, discharge of wastewater into the esteros was not included in the Project alternatives; but, increased discharge to the Russian River was included. Multiple storage sites have been included, in that nine potential sites have been studied, some of which must be combined to provide adequate storage. Refer to Master Response 14 located in Section 6.2 of this document, for more information about multiple small storage reservoirs. Finally, agricultural irrigation has been included in the current alternatives in Sebastopol, portions of Marin, and the South County; but not in Chileno Valley. Chileno Valley was eliminated from further consideration because of the small size of the area, length of pipeline needed to serve the area, and relative lack of interest in the area in using reclaimed water for irrigation. The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision-makers.

**Response to Comment 13-2**

*Comment Summary: The comment requests that the City consider a phased Project.*

Refer to Master Response 14, located in Section 6.2 of this document, concerning a phased Project.

**Response to Comment 13-3**

*Comment Summary: The comment states that while the Draft EIR/EIS identifies direct costs and benefits of each alternative, the multiplier effect of the irrigation alternatives is not considered, and without the multiplier effect, the benefits of these alternatives are understated.*

The Draft EIR/EIS does consider the multiplier effect for the irrigation alternatives. As indicated in Section 4.18 of the EIR/EIS (page 4.18-29), the input-output model used for the analysis of economic impact included a multiplier analysis which was applied to increases in agricultural production value, as well as to the investment in the Project and

ongoing operation and maintenance expenditure. Thus, the annual economic benefit and costs for Alternatives 2 and 3 (which include agricultural irrigation), shown in Table 4.18-18 in Section 4.18, include a multiplier effect in estimates of both income and employment.

#### **Response to Comment 13-4**

*Comment Summary: The comment states that South County is more suitable for higher value crops than West County.*

The comment correctly summarizes information presented in the Draft EIR/EIS. As explained on page 4.18-39, "although the crop yields are generally higher in the South County the total agricultural benefits from a fixed amount of irrigation water are greater in the West County due to the substantial acreage difference (between 2,200 and 2,800 more acres could be irrigated in West County than in South County under the three cropping scenarios)." Thus, although the value per acre is projected to be higher in South County, the total acreage is greater in West County, due to the lower water demand per acre.

#### **Response to Comment 13-5**

*Comment Summary: The comment indicates that although Petaluma recently approved a wastewater project which included use of reclaimed water, the project is not mentioned in the Draft EIR/EIS. The comment also suggests that the Draft EIR/EIS should describe the Petaluma project and identify whether a joint project with Petaluma is possible as part of a South County alternative.*

The Petaluma wastewater project is identified in Table 4.6-50 in Section 4.6 of the Draft EIR/EIS as one of the cumulative projects analyzed in relation to the proposed Project. The Project cumulative impact analyses for agriculture (page 4.2-28), surface water quality (page 4.6-131), public health and safety (page 4.7-64), terrestrial biological resources (page 4.8-119), aquatic biological resources (page 4.9-89), transportation (page 4.11-54), and noise (page 4.13-54), specifically mention the Petaluma project in their analyses of impacts. The Petaluma and Santa Rosa Subregional System wastewater projects have undergone separate environmental analysis and documentation, and the Petaluma project EIR/EIS recognizes that the impacts of a South County alternative are being addressed by the Santa Rosa Subregional System Draft EIR. Also, please see Response to Comment 38-8 for a further discussion of the potential for a joint project with the City of Petaluma.

#### **Response to Comment 13-6**

*Comment Summary: The comment consists of a duplicate copy of the Marin County Community Development Agency letter of October 4, 1996.*

These comments have been addressed in Responses to Comments 13-1 through 13-5.