

COMMENT LETTER 24 - NO AUTHOR “STAKEHOLDERS CONSENSUS ON REUSE (SCOR)” (HANDOUT), RECEIVED SEPTEMBER 24, 1996

Response to Comment 24-1

Comment Summary: The comment states that the Stakeholder’s Consensus on Reuse (SCOR) supports a Project based on certain objectives.

Objectives 1, 2, 3, and 5 stated in the comment by SCOR match very well with the Project objectives delineated on page 1-3 of the Draft EIR/EIS. Regarding objective 4 as stated in SCOR’s comment, the City of Santa Rosa welcomes collaboration with farmers and investors, and would prefer a Project that only involves willing landowners. Irrigation contracts would only involve willing landowners; there is no proposal to condemn irrigation land. However, it may not be possible to implement a Project that requires a new storage reservoir working solely with willing landowners.

Response to Comment 24-2

Comment Summary: The comment recommends use of small to medium sized reservoirs.

Refer to Master Response 14, located in Section 6.2 of this document.

Response to Comment 24-3

Comment Summary: The commentor suggests that, as part of a proposed reuse system, continued agricultural irrigation of the 5,000 acres now part of the Subregional System (subject to a “Buffers” option as described in Comments 24-10 and 24-11) plus 8,000 acres of additional irrigated agricultural land would assure full water use.

The discussion of acreage requirements for agricultural irrigation in Section 3.3 of the Draft EIR/EIS (page 3.3-36), indicates that an additional 8,000 acres of irrigated land would be more than sufficient to accommodate the projected use of reclaimed water for the agricultural irrigation component of the Project. The “Buffer” option is addressed in Response to Comment 24-6.

Response to Comment 24-4

Comment Summary: The comment recommends that current discharge limits be retained for 5 years and then reduced to 1% of river flow.

Although it has been adequate for the last few years, a 5 percent discharge, which is currently allowed with authorization from the Executive Officer of the Regional Water Quality Control Board, would not be adequate in a very dry winter. To function reliably under all weather conditions the existing system would need an approval for maximum discharge to the Russian River of 20 percent. Refer to Master Response 14, located in Section 6.2 of this document, concerning a phased Project.

Response to Comment 24-5

Comment Summary: The comment recommends a phased Project, stating it would foster trust between farmers and the City and be more adaptable and marketable. .

Please refer to Master Response 14, located in Section 6.2 of this document. Both NEPA and CEQA require that alternatives be feasible. Beyond that, Project characteristics such as adaptability and acceptability are not environmental issues and are not addressed in the Draft EIR/EIS, except as they relate to feasibility of the Project.

Response to Comment 24-6

Comment Summary: The comment recommends a system of buffers to avoid the need for designing a system for all possible weather years.

The Project is designed with such a buffer system, which is described in Section 3.3 of the Draft EIR/EIS (pages 3.3-42 and 3.3-43). As noted there, "The Contingency Plan is designed to reduce the incidence of discharges to the Russian River above the design discharge rate for Alternatives 2, 3, and 5. The Project facilities are designed to have a 95 percent reliability, which means that 'contingency volumes' are produced in 1 of every 20 discharge months (about once every two to three years)." The Contingency Plan uses winter irrigation, contingency storage, emergency conservation, and contingency discharge, in that order, to provide a buffer. Several of these measures parallel those suggested by the comment. Contingency Plan measures are designed to avoid additional capital expenditure. Thus, measures such as shifting city-owned land from regular irrigation to use only during unusual weather years have not been used. Removal of city-owned land from regular irrigation would have considerable expense because new lands would have to be added to the irrigation program to replace the city-owned lands. The existing and proposed winter irrigation program is very similar to that suggested by the comment. The City contracts with private landowners to assure certain acreage can be irrigated during the winter (above and beyond the normal summer irrigation contracts) when river discharge is not adequate for managing reclaimed water.

Response to Comment 24-7

Comment Summary: The comment states that there has been a fundamental change in the character of the Project from a massive one-time public works project to a partnership with the farming community and entrepreneurs who may assist with storage sites and water use.

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