

COMMENT LETTER 25 - UNITED WINEGROWERS FOR SONOMA COUNTY, BOB ANDERSON (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 25-1

Comment Summary: The comment questions the derivation and use of the Project wastewater flow projections, and suggests Project phasing.

Appendix D-4 (Wastewater Flow Projections) of the Draft EIR/EIS provides information on how the 21.3 million gallons per day Average Dry Weather Flow figure was derived. The Average Dry Weather Flow was then used in the Monthly Water Balance Model to determine the necessary size of storage and irrigation facilities for each potential design discharge rate. The Monthly Water Balance Model is described in Appendix D-8 (Water Balance Model-Summary and Results) of the Draft EIR/EIS. Refer to Master Response 14, located in Section 6.2 of this document, for a discussion of Project phasing.

Response to Comment 25-2

Comment Summary: The comment states that particular detailed information about monthly water balance output was not included with the Draft EIR/EIS.

Appendices D-8 through D-13 of the Draft EIR/EIS provide detailed information about the water balance model, facility sizing, and discharge operations that is considered by the EIR/EIS authors to be necessary for evaluation of Project impacts. Additional model output is not provided because it is not considered necessary for evaluation of Project impacts, and the comment does not indicate how the information is necessary for evaluation of impacts. The requested information is available in the Project library at the Laguna plant.

Response to Comment 25-3

Comment Summary: The comment states that particular detailed information about monthly and daily water balance output was not included with the Draft EIR/EIS. The comment also states that the months in which adverse water quality impacts occurred were not identified.

The rationale for not providing the water balance output is described in Response to Comment 25-2. The month in which adverse water quality impacts occur is identified in Figures 4-1 through 4-62 in Appendix I-17 (Water Quality Impact Analysis Report Volume II - Figures) of the Draft EIR/EIS. These impacts are related to the concentration of reclaimed water much more so than the absolute quantity of reclaimed water being discharged. Therefore, Figures 4-1 through 4-12 in Appendix I-17 show the distribution of reclaimed water concentrations.

Response to Comment 25-4

Comment Summary: The comment indicates that it is unclear whether the intent of the Draft EIR/EIS is to provide a basis for 1) requesting a change in the North Coast Region Basin Plan to allow discharges of treated effluent to the Russian River at a rate of up to 20 % of river flow under all flow conditions and for all dischargers, or 2) to establish a maximum discharge volume based on the Subregional System's capacity at buildout.

The Draft EIR/EIS is not intended to provide a basis for requesting a change in the Basin Plan or to establish a maximum discharge volume. As indicated on Page 1-5 of the Draft EIR/EIS, the intent is to serve as a joint review document to meet the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). Accordingly, the purpose of the document is to assess all reasonable alternatives, provide a full discussion of significant impacts of the alternatives, and inform decision makers and public of Project alternatives that could avoid or minimize adverse impacts or actually enhance environmental quality. Pages 3.1-9 through 3.1-15 of the Draft EIR/EIS describe the design discharge rates (1% to 20 %) and period (October 1 through May 14 of each year) being considered. Based on the selected alternative, the City of Santa Rosa will request a revision to their existing discharge permit; this could include a request to change the design discharge volume.

Response to Comment 25-5

Comment Summary: The comment indicates that the Draft EIR/EIS does not adequately address impacts resulting from any future wastewater discharges to the Russian River from Windsor which occur at a rate exceeding the Regional Water Quality Control Board 1% limitation.

The quantity and quality of existing discharges to the Russian River from Windsor are addressed on pages 4.6-20 through 4.6-23 of the Draft EIR/EIS. Potential cumulative impacts resulting from increased wastewater discharges from Windsor are addressed on pages 4.6-136, 4.6-140, and 4.6-141 of the Draft EIR/EIS. Since, as noted on page 4.6-21, the discharge of treated effluent from Windsor to the Russian River is currently limited by the North Coast Regional Water Quality Control Board to 1% of the Laguna de Santa Rosa flow October 1 through May 14, and no evidence has been provided indicating that the discharge percentage is expected to increase, analysis of impacts resulting from Windsor discharges exceeding the 1% limitation is not warranted.

Response to Comment 25-6

Comment Summary: The comment asks if whether the 4,650 mg shown in the Summary of the Draft EIR/EIS and the maximum monthly discharge of 775 MG were the maximum discharge levels used to evaluate impacts of the 20% river discharge alternatives. The comment also asks "what factor or combination of factors could serve to reliably determine and monitor the 20% alternative in the future."

As described on page 34 in Appendix I-8 (Russian River Water Quality Model) of the Draft EIR/EIS, the water quality impacts evaluation is based on a daily simulation of discharge. The water quality impacts summarized in Appendix I-16 (Water Quality Impact Analysis Report Volume I - Text) of the Draft EIR/EIS reflect the impacts of each day of design discharge operations in a dry, normal and wet year (as represented by the 70-year period of flow record). Contingency discharge operations impacts were also estimated in the driest year in the 70-year period. The analysis of discharge impacts in Appendix I-16 shows that impacts are related to discharge rate rather than quantity. Appendix D-9 (Analysis of Results from Daily and Monthly Water Balance Models) of the Draft EIR/EIS shows that the daily and monthly water balance model simulations of discharge operations are similar, and that the maximum daily reclaimed water concentration is greater than the maximum monthly average rate. Thus, the water quality impacts analysis is considered by the EIR/EIS authors to include the full range of potential impacts.

Response to Comment 25-7

Comment Summary: The comment proposes an alternative water balance scheme and suggests Project phasing.

The EIR/EIS authors have reviewed the proposed water balance scenario submitted with the comment, and the commentor approached the EIR/EIS authors after the end of the comment period to provide additional information regarding his concerns about the water balance. Subsequent discussions with the commentor have confirmed that he agrees that the water balance used in the Draft EIR/EIS is appropriate for use in environmental analysis. Each component of each alternative was configured conservatively for purposes of the Draft EIR/EIS (i.e., configured to have the greatest impact) to assure that the Draft EIR/EIS addresses the full range of potential Project impacts. During Project selection, the Board of Public Utilities has the option of considering Project configurations with less severe impacts. In regard to the acceptability of Project phasing, refer to Master Response 14, located in Section 6.2 of this document.

Response to Comments 25-8 through 25-31

Comment Summary: Comment 25-8 refers to attached tables that show "Average Monthly Plant Flows for 21.0 mgd ADWF" and flows in the Russian River. Succeeding comments are attachments, including tables depicting "Full Plan" and "1/2 Plan" plant flows, irrigation, and river discharge (prepared by Bob Anderson, 9/24/96). Other references for storage, treatment, and irrigation levels from the Draft EIR/EIS are included in the comment as attachments.

The comments consist of data in support of Comment 25-7. Refer to Response to Comment 25-7.

