

COMMENT LETTER 30 - SCOR, RUE FURCH (NO DATE), RECEIVED SEPTEMBER 24, 1996

Response to Comment 30-1

Comment Summary: The comment suggests use of emergency conservation.

Emergency conservation is included in the Contingency Plan for the Project. Refer to page 3.3-42 of the Draft EIR/EIS.

Response to Comment 30-2

Comment Summary: The comment states that from an economic perspective, agricultural reuse is the only alternative that creates revenues.

While the agricultural irrigation alternatives (Alternatives 2 and 3) create the highest revenues of the alternatives, Alternative 4 (Geysers) and Alternative 5A (Russian River Discharge) also create some revenue from direct and indirect economic activity, as indicated on page 4.18-49 in Section 4.18 of the Draft EIR/EIS.

Response to Comment 30-3

Comment Summary: The comment states that discharge to the Russian River represents a net cost and is contrary to the primary objective of reuse and reclamation.

The comment is correct that Alternative 5A represents a net cost, as identified in Table 4.18-19 on page 4.18-51 of the Draft EIR/EIS. With respect to consistency with the primary objective, Section 1.1 (page 1-4) of the Draft EIR/EIS indicates that the purpose of the Project is to dispose of the reclaimed water in a manner that maximizes recycling and reuse. Discharge to the Russian River constitutes recycling, as most of the reclaimed water originates from the River and is supplied to the Santa Rosa area by the Sonoma County Water Agency.

Response to Comment 30-4

Comment Summary: The comment states that wastewater and reclaimed water is needed in the future for farmland to remain viable and productive, and that the reclaimed water has an economic value for the users of the City of Santa Rosa Subregional System. The comment also calls for the City to remain committed to reclamation and to select a Project based on a comprehensive cost-benefit perspective.

One of the City's objectives is to "Maximize reclamation, recycling and reuse of advanced treated wastewater to the greatest extent feasible" (refer to page 1-3 of the Draft EIR/EIS). The Draft EIR/EIS recognizes that reclaimed water has an economic value, and in Section 4.18 (pages 4.18-38 through 4.18-44) analyzes the potential increases in agricultural production through irrigation with reclaimed water. The analysis concludes

that the increase in value would range between \$2.5 million and \$102 million annually, depending upon specific cropping scenarios and the alternative selected. However, this does not indicate that agriculture without irrigation is not viable. Also, it should be noted that Section 4.18 (page 4.18-51) concludes that the benefits of the increased value would accrue to the agricultural users most directly. Indirect economic benefits would accrue to the region as a whole from the increased economic activity. Only if the City were to charge for reclaimed water would the benefits of increased agricultural production lower service charges to ratepayers. The City has not decided whether or not to charge for reclaimed water; the Draft EIR/EIS socio-economic analyses, therefore, assumed that there would be no charge. Also refer to Master Response 13, located in Section 6.2 of this document concerning charging for the use of reclaimed water.

Regarding the selection of a Project, refer to Master Response 2, located in section 6.2 of this document.

Response to Comment 30-5

Comment Summary: The comment suggests a phased solution using public-private partnerships.

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

Response to Comment 30-6

Comment Summary: The comment suggests a system of buffers.

The Project includes a Contingency Plan, which is analogous to the suggested buffers. Also, refer to Response to Comment 24-6 regarding buffers.

Response to Comment 30-7

Comment Summary: The comment suggests a phased Project, using public private partnerships. The comment also recommends that the selected Project include re-use and be environmentally responsible.

Refer to Master Responses 14 and 2, located in Section 6.2 of this document, regarding a phased Projects and recommendations regarding Project selection respectively. The City has a number of objectives that call for selection of an environmentally sound project including: “protect public health and safety”, “promote wise use of water resources”, protect “beneficial uses of receiving waters”, and “Satisfy applicable regulatory agency and institutional guidelines and requirements” (refer to page 1-3 of the Draft EIR/EIS).