COMMENT LETTER 38 - BILL KORTUM (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 38-1

Comment Summary: The comment states that no mention is made in the Draft EIR/EIS of the potential environmental advantages of using the reclaimed water rather than discharging it to the Russian River.

Five primary alternatives were studied in the Draft EIR/EIS and are summarized on pages 1-18 through 1-22. Each of the alternatives meets the objectives of the City, which state that reuse and recycling should be maximized (refer to page 1-3). In addition to the Discharge Alternative (Alternative 5) which recycles water to the Russian River, three alternatives stressing reuse and reclamation of the tertiary treated wastewater were studied: South County Reclamation Alternative (Alternative 2), West County Reclamation Alternative (Alternative 3), and the Geysers Recharge Alternative (Alternative 4). Results of in-depth studies of the environmental impacts for each of the alternatives are found in Chapter 4, Sections 4.1 through 4.19. A comparison of how each of the alternatives meets the objectives of the City is a responsibility of the decision makers during the selection process, not of the Draft EIR/EIS.

Response to Comment 38-2

Comment Summary: The comment notes that reclamation provides water for landscaping, golf courses, and the double plumbing of houses. The comment also references an attached letter from John Brown, Vice Chair for the State Water Resources Control Board (April 15, 1996), in which Mr. Brown states the Board's appreciation for the City of Santa Rosa's dedication to water reuse and emphasizes an increasing role for water reuse within the State in order to balance water demands with water supplies.

The Project includes an Urban Irrigation component, using reclaimed water for both landscaping and golf courses. No double plumbing system for residences is proposed. The City has adopted an objective to "maximize reclamation, recycling, and reuse of advanced treated wastewater to the greatest extent feasible" (see page 1-3). The comment supports continued reclamation; this is an opinion regarding Project selection. Refer to Master Response 2, found in Section 6.2 of this document.

Response to Comment 38-3

Comment Summary: The comment states that reuse of the tertiary treated wastewater will delay the time when new potable sources of water would need to be developed, and that this future development could damage the environment.

The City has adopted an objective which includes "wise use of water resources" (see page 1-3 of the Draft EIR/EIS). Where irrigation use of reclaimed water replaces existing use of potable water supplies, this will forestall the need to develop future water supplies.

The Project's urban irrigation component will, in part, replace existing potable water use in those areas where existing urban irrigation needs are met by potable water supply, and some irrigation may avoid the need for future diversions from the river. However, much of the South and West County projects will provide irrigation of areas that are currently not irrigated, and will not augment drinking water supplies. These, and a variety of other issues will be considered in project selection.

Response to Comment 38-4

Comment Summary: The comment states that increasing the percentage discharge to the Russian River each year would have the potential for environmental damage.

Whether the percentage of discharge increases all at once or gradually, the environmental impacts of the full buildout scenario have been identified in the Draft EIR/EIS. Analyses for environmental impacts stemming from the 1% to 20% design discharge to the Russian River have been conducted for the Draft EIR/EIS, and significant environmental impacts have been identified. Higher percentage discharges are not necessarily associated with higher wastewater flows at buildout, but are a function of extremely dry winters, when there is very little flow in the Russian River.

Response to Comment 38-5

Comment Summary: The comment states that strengthening agricultural economic viability would preserve open space, keep the dairy industry in Sonoma County, and promote the grape industry.

Benefits to agriculture are identified in Section 4.18, of the Draft EIR/EIS. Please refer to Table 4.18-17 on page 4.18-39, which estimates potential value of new irrigated crops, and to Table 4.18-18 on page 4.18-49, which shows overall economic benefits of each alternative. The cumulative analysis on page 4.2-28 of Section 4.2 states that "Provision of reclaimed water, and implementation of long-term contracts with agricultural users would enhance productivity of existing agricultural lands, provide substantial economic benefits (see Socio-economics Section), and would tend to maintain lands in agricultural use that might otherwise be converted to other uses. The availability of reclaimed water may be a major factor in reducing the loss of agricultural lands in Sonoma County."

Response to Comment 38-6

Comment Summary: The comment states that the Draft EIR/EIS uses the wrong measurements to determine that the Russian River discharge (Alternative 5) is the least damaging environmental solution.

The Draft EIR/EIS comprehensively evaluated discharge to the Russian River, and the discharge was found to have fewer impacts than any other alternative. Section 4.7 concluded that "Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources and would

not adversely affect human health via other potential exposure pathways" (see page 4.7-61). Section 4.6 found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (see page 4.6-150). However, with implementation of cumulative projects to reduce nutrient inputs to the Laguna, and with mitigation proposed for project impacts, analysis concluded that 20% design discharge to the Laguna could be implemented without significant water quality impacts. Since the comment does not indicate which measurements are inappropriate and no specific evidence or recommendations have been included in the comment, the EIR/EIS authors are unable to respond more specifically to the comment. The methodology for identifying the Environmentally Superior Alternative is discussed on page 5-22.

Response to Comment 38-7

Comment Summary: The comment asserts that the Draft EIR/EIS shows bias toward River discharge by engineering alternatives that are too expensive, indicating that following comments will use the South County Alternative as an example.

As stated in Response to Comments 38-8 through 38-11, which address specific comments regarding the cost estimate for the South County alternative, the Draft EIR/EIS authors affirm that the cost estimates for all Project alternatives were conducted with the same assumptions and approach and that estimated costs are realistic and adequate to provide a basis for relative comparison of costs among the Project alternatives. Each component of each alternative was configured conservatively for purposes of the Draft EIR/EIS to assure that the Draft EIR/EIS addresses the full range of potential project impacts and to assure that the City has the option of considering different (and less costly) project configurations.

Response to Comment 38-8

Comment Summary: The comment states that the Draft EIR/EIS does not consider the economy of scale available for a South County project by a partnership or contractual relationship, combining the Santa Rosa Subregional Wastewater Project with a wastewater storage and delivery system being considered by the City of Petaluma, and suggests that the cost savings from such a combined project would be $15-20 million for each City. The comment further states that the EIR prepared by the City of Petaluma for their wastewater addresses a partnership with Santa Rosa and attaches Exhibit B in support of this statement.

The Draft EIR/EIS for the Santa Rosa Subregional Wastewater Project does not consider a partnership or contractual relationship with the City of Petaluma as part of Alternative 2 (South County Reclamation) because the feasibility of a joint project is, at this point in time, speculative. As is stated on page 11 of Exhibit B of Comment Letter 38 (which consists of excerpts from a City of Petaluma Staff Report dated September 12, 1995, and titled “Wastewater Facilities Project and Long Range Management Program, Summary of Key Issues”), the City of Petaluma’s revised draft EIR does not evaluate a joint project

alternative because the Santa Rosa Draft EIR/EIS will consider impacts of a South County Alternative. As is also noted in the Staff Report, combining the two projects would involve issues such as availability and capacity of reservoir sites capable of serving both systems; the timing of construction for the two projects; the availability of sufficient irrigation land to serve both systems; the quality of effluent from both treatment systems; and apportioning of costs.

If the City of Santa Rosa selects a project based upon the South County Alternative, it may then be appropriate to further consider the feasibility of a joint project. This approach is consistent with that taken by the City of Petaluma, as stated in the September 12, 1995 Staff Report, "Although the EIR/EIS [for the Santa Rosa System] will not specifically address a joint project, it may be used by both the City of Petaluma and the City of Santa Rosa, if a joint venture project is pursued that is consistent with the options evaluated."

The accuracy of the comment's statement concerning a savings of $15-20 million for each City cannot be verified because no supporting data are provided.

Response to Comment 38-9

Comment Summary: The comment suggests that stormwater diversion structures are not necessary for the Tolay reservoir, and could reduce costs by $15 million if eliminated.

Appendix D-17 (Reservoir Stormwater Diversion Structures) of the EIR/EIS provides an analysis of the requirement for stormwater diversion. Stormwater diversion structures are recommended for the Tolay site because the large size of the watershed area will funnel up to 1,700 million gallons (MG) of runoff into the Tolay Extended reservoir. Combined with a dead storage volume of 750 MG this would reduce net reclaimed storage capacity from 4,500 MG to 2,050 MG (refer to Table 1 on page 10 in Appendix D-17), which is inadequate to serve a project with either 1% or 5% design discharge to the Russian River. Collecting runoff to add to the reservoir would result in inadequate storage for reclaimed water, and would require the construction of another reservoir site to achieve the 4,000 MG of net storage required for a 1% design discharge project. The cost of constructing another reservoir would equal or exceed the cost of the diversion structure, and would have additional environmental impacts. A diversion structure was, therefore, considered technically, financially, and environmentally advisable. Even with stormwater diversion structures, not all runoff can be captured and directed around the reservoir. The water balance must thus account for the remaining stormwater runoff that cannot be diverted.

It would be possible to refine the water balance for a particular reservoir site to determine whether increased discharge to the Russian River could be used to balance additional inflow from runoff during wet years, thereby reducing or eliminating the need for stormwater diversion. This would require construction of a site-specific water balance, and such a water balance model could be developed for any reservoir site to refine the design and cost during the Project selection phase. A cost reduction of $15 million for the Tolay reservoir would not change its relative cost ranking with the other alternatives.

However, there are other factors that may require construction of diversion structures. In addition to the need to preserve reservoir capacity, stormwater diversion at the Tolay Reservoir is needed because water in Tolay Creek would collect behind the backdam at the upstream end of the reservoir. This water must be collected and discharged. There is also a need to maintain flows in Tolay Creek downstream of the reservoir. The best way to maintain flows downstream is to convey the water collected upstream of the reservoir and convey it through diversion structures around the reservoir to the creek.

Response to Comment 38-10

Comment Summary: The comment questions why the transmission pipeline proposed from the Llano Road plant to the Tolay reservoir does not include means to distribute water to irrigation or to smaller storage ponds along the way, similar to existing deliveries to Poncia Pond.

The transmission pipeline from the plant to the reservoir would serve also to distribute water (from the plant or from storage) to irrigated properties along the way. The transmission pipeline and its pump station at the plant were sized to deliver the water to the reservoir. The operating pressure along the way could be utilized to deliver water to the boundary of many irrigated properties. Booster stations (not included in the Project) could be used (if necessary) to boost pressure for individual irrigation systems.

Also included in the Project are major but smaller diameter branch distribution pipelines and pump stations to deliver water from the transmission pipeline to other irrigation areas not along the main transmission pipeline.

The utilization of small storage ponds (like Poncia) was not included in the Project because of their low cost effectiveness, and the difficulty of managing small ponds. Refer to Master Response 14, located in Section 6.2 of this document, regarding small reservoirs. Individual operators may choose to use on-site ponds for management of water, but these would be part of their individual operation, and are thus not evaluated as part of the Project alternatives.

Response to Comment 38-11

Comment Summary: The comment suggests that the criterion of delivering at least 40 pounds per square inch to the pipeline delivery system (as assumed in the KYPIPE computer model used to size the pipelines and pump stations) resulted in higher cost than necessary.

Only preliminary-level computer modeling of the water transmission and distribution system was conducted in support of the Draft EIR/EIS. The pipeline systems were not fully optimized. It is agreed that, for both the South County Alternative and the West County Alternative, lowering the delivery pressure requirement would probably result in some pipelines being smaller in diameter and some pump stations requiring lower horsepower pumps, which would reduce constructed cost of the project. This would

require additional computer runs to verify. This additional computer modeling should be done during the design process for the selected project to optimize the size of the pipelines and the number, location and horsepower of the pump stations. The effort to conduct this modeling now is beyond the scope of the EIR/EIS and is not required for the environmental analysis; therefore the suggested cost savings cannot be verified. However, a totally non-pressurized delivery system would not be feasible; much of the reclaimed water would have to be pumped to reservoirs in the winter months and would have to be pumped back, usually uphill, to users in the summer.

Response to Comment 38-12

Comment Summary: The comment states that the Draft EIR/EIS does not discuss smaller sites. On the pages prior to this comment, there is a table of "reconfigured" project costs and a listing and map of reservoirs proposed by the Koretsky King report.

The table of "reconfigured" project costs is not directly discussed in the comment letter, but appears to summarize the cost savings suggested in Comments 38-8 through 38-11. As discussed in the Responses to Comments 38-8 through 38-11, the suggested savings are either not possible, or cannot be verified. The EIR/EIS authors thus cannot agree with the table, and feel that the costs presented in Appendix D-30 (Alternative Projects Construction Cost Estimates) are appropriate. The 1980 Koretsky King report was reviewed and used as a source of information regarding potential reservoir sites. The Koretsky King report concluded that of the 50 sites that were evaluated, 20 were worthy of further consideration, and after further screening reduced the candidates sites to nine. However, most of these sites did not meet the criteria developed for the Long-Term Project. These criteria are discussed in Appendix D-6 (Documentation in Support of Elimination of Alternatives) starting on page 23. Two reservoir sites from the Koretsky King report were carried forward for evaluation in the Draft EIR/EIS: Tolay and Adobe Road. Refer to Master Response 14, found in section 6.2 of this document, which addresses the use of smaller reservoirs.

Response to Comment 38-13

Comment Summary: The comment states that the Draft EIR/EIS fails to discuss a transmission line in the center of potential irrigation acreage.

Some transmission pipelines traverse irrigation areas, some do not. The decisions regarding placement of transmission lines (from the plant to the reservoir) and distribution lines (from the reservoir to the irrigation area) were made based on a variety of factors including topography, need for pump stations, distance, use of tunneling, and location of irrigation areas. As stated in Response to Comment 38-11 regarding pressure in the pipelines, the location of pipelines will be refined at the design stage of the Project, should an agricultural irrigation alternative be selected by the City.

Response to Comment 38-14

Comment Summary: The comment states that the Draft EIR/EIS fails to discuss a transmission line which is a "straight shot" to Tolay.

Section 3.3 of the Draft EIR/EIS (page 3.3-7) indicates that transmission pipelines would generally follow public rights-of-way, except for short cross-country sections to enter the reservoirs. The alignment for the transmission pipeline to the Tolay reservoir utilizes the most efficient route from the Laguna Plant to the reservoir along public rights-of-way except for the final short segment entering the reservoir. A "straight shot" alignment would be a cross country route which would cause significant disruption to private property all along the route, and would have to overcome greater changes in elevation resulting in less efficiency. Appendix D-25 (Transmission Pipeline Routes to all Reservoir Sites) of the Draft EIR/EIS, which is referenced in Section 3.3 (page 3.3-7) provides additional information on the transmission pipeline routes.

Response to Comment 38-15

Comment Summary: The comment states that the Draft EIR/EIS fails to discuss that the South County alternative makes available diked baylands which provide ability to expand the system in years to come.

Portions of the baylands were evaluated in the Draft EIR/EIS for agricultural irrigation as part of Alternative 3 (South County reclamation). However, the Project does not intend to supply reclaimed water to irrigate any other baylands. As indicated in Section 3.3 (page 3.3-36), the Project would utilize a maximum of 3,800 acres for agricultural irrigation under a South Country alternative. The Project does not include any provision for expansion beyond 3,800 acres for the agricultural irrigation component under the South County alternative. This acreage is sized to provide a system for use of reclaimed water to meet the needs of the Subregional System at buildout of the member communities' General Plans. Therefore, availability of additional diked baylands to provide ability to expand the system in years to come is beyond the scope of this Project.

Response to Comment 38-16

Comment Summary: The comment states that the Draft EIR/EIS does not discuss the financial advantages of a phased system.

Refer to Master Response 14, found in section 6.2 of this document, which discusses a phased system.

Response to Comment 38-17

Comment Summary: The comment states that the issue of the value of water resources to agriculture having considerable economic impact on Sonoma County is well covered in the Draft EIR/EIS.

The comment agrees with the conclusions of the Draft EIR/EIS.

Response to Comment 38-18

Comment Summary: The comment suggests that the project strengthens agriculture and therefore is underwriting the preservation of open space. The comment also states that the Draft EIR/EIS does not discuss open space preservation or participation by the Open Space District.

The Draft EIR/EIS recognizes that Alternatives 2 and 3 (the South County and West County Reclamation Alternatives) will strengthen agriculture through the use of reclaimed water for agricultural irrigation consistent with the purpose of the Project as stated in Section 1.1 of the document on page 1-4. The Draft EIR/EIS also addresses the question of preservation or loss of open space related to agriculture in Section 4.1 (page 4.1-38) as part of the discussion of impacts related to the agricultural irrigation component. The discussion notes that Alternatives 2 and 3 will not result in a loss of open space through conversion to urban uses because these alternatives will allow the continuation of agricultural use.

However, preservation of open space is not specifically identified as an objective of the project, and to the extent that open space is preserved as part of the project, it would be incidental to the adopted objectives of the project but nonetheless, an additional benefit. The use of reclaimed water for agricultural irrigation would be by contract with individual users of reclaimed water, and such contracts will not run in perpetuity. This is not consistent with the purpose of the Sonoma County Agricultural Preservation and Open Space District, which is to assure permanent preservation of open space in the County, and therefore discussion of participation by the District in the Subregional Wastewater Project is not deemed appropriate.

Response to Comment 38-19

Comment Summary: The comment notes that the Draft EIR/EIS addresses three alternatives that would accomplish low (below 5 percent) discharge to the Russian River. The comment states that the costs for the South County Reclamation Alternative (Alternative 2), West County Reclamation Alternative (Alternative 3), and the Geysers Recharge Alternative (Alternative 4) are too high to be acceptable to ratepayers. The comment also states that the Draft EIR/EIS should study additional subalternatives within each alternative in order to reduce their costs.

The purpose of the Draft EIR/EIS is to evaluate impacts of alternatives, not to develop the most cost-effective alternative. However, the Draft EIR/EIS does consider the impacts and cost of a South County project with higher Russian River design discharge rates (5%, 10% and 15%). Refer to Appendix A (Range of Discharge Evaluation).

Response to Comment 38-20

Comment Summary: The comment expresses concern about increased discharge to the Russian River and consumer acceptance of the potential for reclaimed water to be mixed with the potable water supply.

The maximum reclaimed water concentration in the Russian River would not necessarily increase every year, even though the total amount discharged may increase. River flow is the primary factor controlling the percent of reclaimed water in the river. The highest percentages will be experienced in dry years when river flows were low. In addition, all analyses conducted in the Draft EIR/EIS were based on buildout of the General Plans that were in effect in April 1994; discharge percentages reported in the Draft EIR/EIS reflect the highest population levels for those General Plans. Neither the Sonoma County Water Agency nor downstream water suppliers, such as the Estero Municipal Water District, are considered to be under surface water influence. For purposes of microbiological contaminant regulations, their water is classified as a groundwater resource and is naturally filtered to remove pathogens that are typical of all surface water sources. The Draft EIR/EIS concludes that no water sources will be compromised by Russian River discharge. The comment is correct that the Draft EIR/EIS does not address consumer acceptance of increased discharge, because speculation about such a matter is outside the scope of analysis required under NEPA and CEQA.

Response to Comment 38-21

Comment Summary: The comment asks what is the value of urban reuse to the ratepayer, indicating that the Draft EIR/EIS addresses urban reuse, but does not contain a freshwater flow chart to measure the advantages of substituting wastewater for potable water to delay the startup time for new sources of potable water.

Refer to Response to Comment 38-3 for a discussion of potable water savings. It would not be possible to construct the kind of flow chart proposed in the comment until specific users, and the source of any current supply are determined.

Response to Comment 38-22

Comment Summary: The comment states that direct dollar benefit to the ratepayer is not achieved by Laguna discharge.

The comment is correct. As shown in Table 4.18-18 on page 4.18-49 of the Draft EIR/EIS, there is no direct economic benefit for Alternative 5B (Laguna Discharge) and there is a net economic loss for that alternative.

Response to Comment 38-23

Comment Summary: The comment states that delivery of reclaimed water to agriculture would keep the discharge of reclaimed water to less than 5%, as opposed to Laguna discharge which would build to 20% over the life of the project. The comment also states that the Draft EIR/EIS does not address a solution after the life of the project and questions whether the discharge to the Russian River would increase to 35% or 40%.

The project alternatives include a range of discharge rates to the Russian River, as stated in Section 3.1 of the Draft EIR/EIS (page 3.1-4), and the selected project could have a design discharge rate between the extremes of 1% and 20% evaluated in the Draft EIR/EIS. Therefore, it would be possible for the selected project to have a greater than 5% discharge rate, but still include an agricultural irrigation component. Similarly, it would be possible for the selected project to have a Laguna discharge rate of less than 20%, provided that additional agricultural irrigation would be included in the project.

As stated in Section 1.1 of the Draft EIR/EIS (page 1-3), the project is designed to accommodate the reclaimed water flows at buildout of the General Plans (in effect as of April, 1994) of the communities making up the Subregional System, and based upon current projections, this buildout is estimated to occur between 2010 and 2020. The project considers only those facilities which would be required to provide for reliable disposal of those flows.

Response to Comments 38-24 and 38-25

Comment Summary: The comment states that the Draft EIR/EIS does not address expandability of a South County or West County project, and asks about the feasibility and comparative costs to expand at the end of project life.

As stated in Section 1.1 (page 1-3) the project is designed to provide a system for use of reclaimed water to meet the needs of the Subregional System at buildout of the member communities' General Plans, some time between 2010 and 2020. Expansion of the system to serve needs beyond that buildout is beyond the scope of the Draft EIR/EIS.

Response to Comment 38-26

Comment Summary: The comment suggests that costs of denitrification could be avoided by selecting an agricultural irrigation project with discharge to the Russian River at less than 5%.

The technical memorandum attached as Exhibit F to Comment Letter 38, Evaluation of Created Wetland Conceptual Design, was prepared before water quality analyses were complete, so at that time it was not known which discharge scenarios might require denitrification. At that time it was deemed possible that all discharges might require nitrogen removal. The Draft EIR/EIS indicates that nitrogen removal is recommended only for the 20% design discharge scenario. However, the North Coast Regional Water

Quality Control Board has expressed concern about the impact of storage reservoirs on nitrate levels in West County and South County. They have requested consideration of additional mitigation, including nitrogen removal to mitigate this impact (refer to Response to Comment 8-3). Removal of nitrogen would reduce groundwater impacts, but would also reduce the value of the water for irrigation. The ultimate decision about whether nitrogen removal will need to be implemented will be made by the City and will be subject to Regional Board approval when the City applies for its new discharge permit.

Response to Comment 38-27

Comment Summary: The comment states that for the $42 million it will cost for denitrification, a transmission line could be built to Tolay.

Denitrification is not included in the cost for Alternative 2A, South County Irrigation, with the Tolay extended reservoir site. Thus there are no costs for denitrification that can be reallocated to other project components. Refer to Response to Comment 38-26.

Response to Comment 38-28

Comment Summary: The comment states that the Draft EIR/EIS does not address the potential cost of an additional water treatment plant at some midway point if potable water quality may be challenged. The comment also states that in an attachment (a letter from the North Marin Water District to the City of Santa Rosa dated December 6, 1995), the North Marin Water District quotes the cost of such a facility at $210 million.

The same letter was attached to comments submitted by the North Marin Water District. Refer to Responses to Comments 18-2 and 18-3. Refer also to Master Response 8, located in Section 6.2 of this document.

Response to Comment 38-29

Comment Summary: In reference to statements in Comment 38-28 concerning the costs of water treatment plant that may be required at some point when potable water quality may be challenged, the comment states that to a ratepayer the Laguna discharge option looks financially attractive but on the long haul is financially unattractive.

A water treatment plant would not be required, and therefore the long-term cost of the Laguna discharge option is as stated in the Draft EIR/EIS. Refer Response to Comments 18-2 and 18-3, and to Master Response 8, located in Section 6.2 of this document.

Response to Comment 38-30

Comment Summary: The comment summarizes points made in previous comments.

Refer to Response to Comments 38-26, 38-28, 38-3, and 38-25.

Response to Comment 38-31

Comment Summary: This comment is an attached letter from John W. Brown of the State Water Resources Control Board used as an exhibit for comment 38-2.

Refer to Response to Comment 38-2.

Response to Comment 38-32

Comment Summary: This comment is an attached excerpt from the 1995 Petaluma Staff Report for the Wastewater Facilities Project and Long Range Management Program, Summary of Key Issues used as an exhibit for comment 38-8.

Refer to the Response to Comment 38-8.

Response to Comment 38-33

Comment Summary: This comment is an attached excerpt from Parsons Engineering Science Technical Memorandum, September 2,6 1995, used as an exhibit for comment 38-9.

Refer to Response to Comment 38-9.

Response to Comment 38-34

Comment Summary: This comment is an attached excerpt from Appendix D-23) (Kypipe Model Optimization for Agricultural Irrigation Systems TM-P-7), August 3, 1995, used as an exhibit for comment 38-11.

Refer to Response to Comment 38-11.

Response to Comment 38-35

Comment Summary: This comment is an attached copy of a March 7, 1995 Memorandum concerning the Evaluation of Created Wetland Conceptual Design, used as an exhibit for comment 38-26.

Refer to Response to Comment 38-26.

Response to Comment 38-36

Comment Summary: This comment is an attached excerpt from a December 6, 1995 North Marin Water District letter to the City of Santa Rosa, used as an exhibit for comment 38-28.

The same letter was attached to comments submitted by the North Marin Water District. Refer to Response to Comments 18-2 and 18-3, and to Master Response 8, located in Section 6.2 of this document.

Response to Comment 38-37

Comment Summary: This comment is an attached letter from the North Marin Water District (February 5 , 1987). It is part of an exhibit for Comment 38-28.

The same letter was attached to comments submitted by the North Marin Water District. Refer to Response to Comments 18-2, 18-3, and 18-11.

Response to Comment 38-38

Comment Summary: This comment is an attachment consisting of a statement by Henry J. Ongerth, Consulting Sanitary Engineer, to the North Coast Regional Water Quality Control Board (January 22, 1987).

The comment letter pertains to a previous project and is not completely relevant to the current Long-Term Project. Refer to Response to Comments 18-2, 18-3, and 18-11.

Response to Comment 38-39

Comment Summary: This comment is a copy of the original comment letter 38 sent by Bill Kortum to the City of Santa Rosa for the Draft EIR/EIS.

All comments identified within this letter copy have been addressed in responses to comments 38-1 through 38-30.