

## **COMMENT LETTER 47 - MIKE REILLY (NO DATE), RECEIVED SEPTEMBER 24, 1996**

### **Response to Comment 47-1**

*Comment Summary: The comment indicates that the Draft EIR/EIS conclusion that the least costly and environmentally preferred alternative is discharge to the Russian River “both defies reason and ignores history.”*

The Draft EIR/EIS has evaluated discharge to the Russian River, and has found that discharge has 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" (refer to page 4.7-61). Section 4.6 found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (refer to 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. The reasons for identifying Alternative 5B as environmentally superior are discussed on page 1-59 of the Draft EIR/EIS.

### **Response to Comment 47-2**

*Comment Summary: The comment indicates that the Draft EIR/EIS is a “plan, first and foremost, to accommodate future growth in our county.”*

One of the two overall Project objectives identified on page 1-3 in Section 1 of the Draft EIR/EIS is “Provide wastewater treatment and disposal for the Santa Rosa Subregional Wastewater System to accommodate projected growth as indicated in the currently adopted General Plans of each of the Subregional entities”. However, this is not identified as the primary objective of the Project, and the second overall objective, “Develop and operate the wastewater treatment and disposal system in ways that protect public health and safety and promote wise use of water resources” is considered equally important.

### **Response to Comment 47-3**

*Comment Summary: The comment indicates that the City Council needs to carefully scrutinize the findings in the Draft EIR/EIS prior to certification.*

The EIR/EIS authors agree that decision makers need to review the Draft EIR/EIS, and, at the time of certification, they must exercise their independent judgment and make their own independent determination whether the EIR is adequate and satisfies the requirements of the law.

#### **Response to Comment 47-4**

*Comment Summary: The comment urges use of small storage facilities.*

Refer to Master Response 14, located in Section 6.2 of this document, concerning use of small storage facilities.

#### **Response to Comment 47-5**

*Comment Summary: The comment characterizes the cost/benefit analysis in the Draft EIR/EIS as concluding that there are significant job and economic benefits to expanded agricultural reuse and no permanent benefits for river discharge.*

The comment is correct that Alternatives 2 and 3, which involve use of reclaimed water for agricultural irrigation have overall net economic benefits while Alternative 5A (Russian River Discharge) has no net benefit. However, Section 4.18 of the Draft EIR/EIS (page 4.18-51) points out that the benefits and costs under Alternatives 2 and 3 do not accrue to the same groups.

#### **Response to Comment 47-6**

*Comment Summary: The comment suggests a phased Project using small storage reservoirs.*

Refer to Master Response 14, located in Section 6.2 of this document, concerning a phased Project and use of small storage reservoirs.

#### **Response to Comment 47-7**

*Comment Summary: The comment states that costs for the Geysers alternative could be reduced by downsizing the pipeline, changing the pipeline route, and cost sharing.*

Downsizing the pipe would be possible if Russian River discharge were increased, or if irrigation and storage were expanded. Refer to Response to Comment 103-3 regarding variations in discharge rates. Although an alternate pipeline route is possible, costs of a new route would not necessarily be less. Refer to Response to Comment 103-5 regarding alternate pipeline routes. Cost-sharing and financing options have not been evaluated for any of the alternatives, but would be considered at the time of Project selection. The purpose of the EIR/EIS process is not to develop the most cost-competitive Project, but to evaluate the environmental impacts of alternatives and alternative components.

#### **Response to Comment 47-8**

*Comment Summary: The comment states that there are irrigation options associated with the Geysers Alternative that have not been adequately investigated.*

To increase irrigation in conjunction with the Geysers Alternative would require construction of additional storage. One of the aims in developing the Geysers Alternative was to include an option without the significant impacts associated with construction of new storage reservoirs. However, it would be possible to combine irrigation options with Geysers Recharge. Because the comment does not discuss any specific irrigation options, a more detailed response is not possible.

### **Response to Comment 47-9**

*Comment Summary: The comment states that lower rates of geysers injection would reduce induced seismicity and allow expansion of agricultural reuse.*

The comment is correct that induced seismicity is proportional to injection rates, and lower rates of injection at a specific well would result in lower induced seismicity. Expansion of agriculture has been evaluated in other alternatives, and could be combined with injection at the Geysers. Refer to Response to Comment 47-8.

### **Response to Comment 47-10**

*Comment Summary: The comment states the Draft EIR/EIS is inadequate in addressing the potential impacts of Russian River discharge on area tourism.*

Refer to Master Response 7, located in Section 6.2 of this document, regarding Impacts to the tourist economy.

### **Response to Comment 47-11**

*Comment Summary: The comment states that the city has documentation of the impacts from discharge to the Russian River in 1985 that resulted in damage to the river economy. In addition, the comment states that the Russian River area's success in attracting visitors depends as much on perception as reality.*

Impacts of the 1985 discharges cannot be considered to be comparable to the option of discharging reclaimed water to the River. The 1985 discharges included both two releases of secondary treated wastewater at rates exceeding permitted rates, and a spill of untreated sewage. The existing and proposed discharge of highly treated reclaimed water is very different in character from any of the 1985 events. Refer to Master Response 7, located in Section 6.2 of this document, regarding impacts to the tourist economy.

### **Response to Comment 47-12**

*Comment Summary: The comment states the opinion that any decision to pursue Russian River discharge will damage tourism.*

Refer to Master Response 7, located in Section 6.2 of this document, regarding impacts to the tourist economy.

### **Response to Comment 47-13**

*Comment Summary: The comment states that replacement water supply should be provided to mitigate impacts to wells in the Laguna discharge area.*

The analysis of impacts has shown that wells along the Laguna would not be affected, and thus mitigation is not needed. Refer to discussion of discharge impacts on groundwater on page 4.5.56 of the Draft EIR/EIS and to Response to Comment 17-3.

### **Response to Comment 47-14**

*Comment Summary: The comment states that “before committing millions of dollars” the long-term viability of reclaimed water discharge should be considered in light of changing EPA water quality standards.*

All components of all alternatives are subject to changing regulations, and the description of Project compliance (page 2-15 of the Draft EIR/EIS) assures that the Project shall remain in compliance with each new regulation. The alternatives that involve the most capital are least dependent on River discharge, so a City commitment to a relatively high rate of discharge does not require committing as many millions of dollars as do storage-based alternatives like Alternatives 2 and 3.

### **Response to Comment 47-15**

*Comment Summary: The comment states that the EIR/EIS should examine the impending listing of coho salmon and winter-run steelhead as threatened and endangered species.*

Refer to Responses to Comments 1-11, 1-14, 1-15, and Master Response 12, located in Section 6.2 of this document, regarding the change in status for steelhead trout. The coho salmon was analyzed as a federally proposed threatened species in the Draft EIR/EIS. Federally-proposed species were assessed in the same manner (i.e., using the same points of significance) as federally-listed species in the Draft EIR/EIS. Therefore, the current change in status would not affect the impact analysis conducted for coho salmon. Also refer to Response to Comment 1-6 concerning the change in status for coho salmon.

### **Response to Comment 47-16**

*Comment Summary: The comment states that changes in River flow being sought by the Water Agency could dramatically affect the ability to discharge into the River.*

As described in Appendices D-8 (Water Balance Model - Summary and Results) and I-8 (Russian River Water Quality Model), the water balance models upon which the sizing of Project facilities and analysis of impacts are based already include the proposed increases in River diversion by the Sonoma County Water Agency. Thus, if the Agency does not divert as much water as proposed, reclaimed water concentration and many associated impacts would be less than that identified in the Draft EIR/EIS.

## **Response to Comment 47-17**

*Comment Summary: The comment urges consideration of the benefits of irrigation with reclaimed water in Project selection.*

The City has stated an objective which includes "wise use of water resources" (refer to page 1-3 of the Draft EIR/EIS). It is correct that where irrigation using 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 would replace some existing potable water use, and some irrigation may avoid the need for future diversions from the river. However, much of the South and West County Projects would provide irrigation of areas that are currently not irrigated, and would thus not augment drinking water supplies. These, and a variety of other issues will be considered in Project selection.

## **Response to Comment 47-18**

*Comment Summary: The comment urges consideration of a small-scale reuse alternative, and opposes increases in discharge to the Russian River.*

Refer to Master Response 14, located in Section 6.2 of this document, regarding small storage options. Refer to Master Response 2, located in Section 6.2 of this document, regarding opinions about Project selection.

