

COMMENT LETTER 56 - LEN SWENSON (NO DATE), RECEIVED SEPTEMBER 24, 1996

Response to Comment 56-1

Comment Summary: The comment requests consideration of gradual implementation of storage.

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

Response to Comment 56-2

Comment Summary: The comment asks why greywater use and underground injection were not considered.

The City of Santa Rosa does not permit greywater use because soils in the area are not suitable. In addition, greywater use reduces wastewater flows during the summer months when The City is fully able to reuse all of the reclaimed water that is produced. The primary problem with management of wastewater flows is the need to capture winter flows, store them, and reuse them in the summer months or to discharge to the Russian River. Greywater systems consume water during the summer months, but do not address the management of reclaimed water generated during the rainy season. Aquifer storage and recovery was considered as part of the project, but was ultimately not carried forward, in part because studies showed that there was not sufficient capacity in the aquifer for the required amount of storage. Refer to page 21 of Appendix D-6 (Documentation in Support of the Elimination of Alternatives) of the Draft EIR/EIS for a discussion of the reasons that aquifer storage and recovery was not carried forward as part of the Project.

Response to Comment 56-3

Comment Summary: The comment asks whether use of small ponds was explored.

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

Response to Comment 56-4

Comment Summary: The comment asks why the Draft EIR/EIS does not address the beneficial financial and environmental effects from growing high yield cash crops with reclaimed water.

The five levels of farming intensity and three cropping scenarios (high tech, medium tech, and low tech) considered in evaluating the economic viability of Project irrigation alternatives are presented on pages 4.18-11 through 4.18-19 of the Draft EIR/EIS. The

intensity levels range from higher income yielding vineyards and orchards to lower income yielding permanent irrigated pasture. The agricultural impact analysis, which includes the economic benefits from growing high income producing crops with reclaimed water, is presented on pages 4.18-25 through 4.18-28 and 4.18-38 through 4.18-24 of the Draft EIR/EIS. This analysis shows that there are substantial potential economic benefits to agriculture.

Response to Comment 56-5

Comment Summary: The comment asks why recreational use of reservoirs was not considered.

Although reclaimed water is of suitable quality for use in recreational impoundments, management of reservoirs for storage and irrigation would make recreational use infeasible. The reservoirs are managed so as to be empty at the end of the summer, and it is difficult to maintain aesthetic recreational qualities during the summer as the reservoirs are emptied for irrigation. To avoid conflicting management goals, recreational use is not proposed.

Response to Comment 56-6

Comment Summary: The commentor questions why a list of potential recipients of reclaimed water was not prepared for the South County, as was done for the West County.

No lists of potential recipients for reclaimed water were prepared as part of this Draft EIR/EIS, either for the South County or the West County.

Response to Comment 56-7

Comment Summary: The comment asks why there was no study of growth-inducing effects and related environmental consequences of various options.

Section 5.3 of the Draft EIR/EIS addresses the issue of growth inducing impacts of the project alternatives.

Response to Comment 56-8

Comment Summary: The comment requests that costs for South County projects including groundwater injection be estimated.

Before aquifer storage and recovery (ASR) was eliminated from the Project, a cost estimate was prepared for a South County project using a smaller Tolay reservoir combined with 2,000 MG of ASR (Alternative 2E). Appendix D-30 (Alternative Projects Construction Cost Estimate) of the Draft EIR/EIS shows that the construction cost for Alternative 2E is about \$288 million, as compared to about \$264 million for the same alternative with a full-scale Tolay reservoir. The cost for incorporating ASR is higher

because a smaller Tolay reservoir does not cost much less than the full-scale reservoir, and the ASR cost is substantial. Refer to cost tables in Appendix D-30 of the Draft EIR/EIS for further details.

Response to Comment 56-9

Comment Summary: The comment requests that costs for South County projects including smaller ponds be estimated.

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

Response to Comment 56-10

Comment Summary: The comment states that cost projections need to be made for slower population growth to allow a phased in project.

The statement of purpose and need for the Project, contained in Section 1.1 of the Draft EIR/EIS, is based upon providing reliable disposal of reclaimed water through buildout of the General Plans of the member entities of the Subregional System. Slower population growth would require amendment of the General Plans or other municipal actions to limit growth which cannot be enacted by the Subregional System. Because an alternative based upon slower population growth would not be feasible or meet the statement of purpose and need, any consideration of costs for such an alternative would be moot.

Response to Comment 56-11

Comment Summary: The comment asks why a joint project with Petaluma was not studied.

Refer to Response to Comment 38-8.

Response to Comment 56-12

Comment Summary: The comment indicates that the South County alternative should be identified as the environmentally superior option and not the Discharge alternative.

The Environmentally Superior Alternative is discussed in Section 5.5 of the Draft EIR/EIS, starting on page 5-22. Increased Russian River discharge is environmentally superior because it can be accomplished without construction of large physical facilities, and thus has relatively few environmental effects. It is not possible to build the dams, pump stations and pipelines associated with the South County Alternative without significant environmental effects.

