

**COMMENT LETTER 68 - RAYMOND G. MILLER (SEPTEMBER 27, 1996),
RECEIVED OCTOBER 1, 1996**

Response to Comment 68-1

Comment Summary: The comment states that Alternatives 2 and 3 are based on the assumption that the City of Santa Rosa must reuse all of its sewage effluent, and that said assumption has not been proven or agreed to.

The comment is largely correct, in that Alternatives 2 and 3 were developed to provide agricultural reuse of the vast majority of the reclaimed water produced by the Subregional System. Both Alternatives include minimal discharge to the Russian River, with a design discharge rate of 1 percent of River flow. These Alternatives, however, constitute only part of the range of alternatives considered in the Project. Alternative 5 provides evaluation of 20 percent River discharge, with no expansion of the existing irrigation system. Appendix A (Range of Discharge Evaluation) provides analysis of different combinations of river discharge (at design discharge rates of 5%, 10% and 15% of River flow) and expansion of the irrigation system. Higher levels of discharge require less storage and irrigation and therefore have lower costs than Alternatives 2 and 3 with 1% discharge. The purpose of the Project as stated on page 1-4 of the Draft EIR/EIS is "...not only to dispose of reclaimed water, but to do so in a manner that maximizes reclamation, recycling and reuse and optimizes water conservation." The purpose of the Draft EIR/EIS is to divulge impacts of the various alternatives and provide information for decision makers. All of this information will be considered during the Project selection process.

Response to Comment 68-2

Comment Summary: The comment recommends construction of an ocean outfall.

Ocean discharge was evaluated during the screening process and was dropped from consideration because it did not achieve the purpose of water reclamation. Refer to Appendix D-6 (Documentation in Support of Elimination of Alternatives). The treatment plant is designed with other redundant features to meet Title 22 requirements for adequate treatment of reclaimed water.

Response to Comment 68-3

Comment Summary: The comment recommends ocean discharge to limit Russian River discharge for public relations or political reasons.

Refer to Response to Comment 68-2. The Draft EIR/EIS has evaluated impacts of Russian River discharge, and has identified an environmentally superior alternative. It is beyond the scope of the EIR/EIS to make recommendations concerning public relations or political reasons.

Response to Comment 68-4

Comment Summary: The comment is a duplicate copy of Comment Letter No. 68 which has been also typed on the "Draft EIR/EIS Comment Form".

Refer to the responses to Comments 68-1, 68-2, and 68-3.