COMMENT LETTER 70 - JIM SORRELLS (SEPTEMBER 29, 1996), RECEIVED OCTOBER 2, 1996

Response to Comment 70-1

Comment Summary: The comment questions the feasibility of avoiding discharge during flood conditions given the 1985 discharge, which was required to keep storage ponds from overflowing.

Storage capacity problems only arise when river flows are low, and discharge to the River is restricted. The 1985 discharge described in the comment was necessary because river flow was so low that the City could not discharge a sufficient volume of water to prevent exceeding storage capacity.

Discharges at greater rates than the permitted maximum rate, such as the 1985 discharge cited in the comment, occur when Russian River flow is low for a long period. Flood conditions are, be definition, always preceded by periods of elevated River flow, which facilitates release of a large volume of reclaimed water (100 to 200 MGD, depending on Laguna flows). For example, a 150 MDG discharge would be allowed under a 1 percent project (Alternatives 2 and 3) when River flow reaches 23, 000 cfs and at 1,150 cfs under a 20 percent project (Alternative 5). Under Measure 2.5.10: Discharge Prohibition During Flood Stage, discharge could continue until River flow reaches 37,160 cfs (which corresponds to 31 feet on the Hacienda gauge, as shown in the stage curve appended to Appendix G-1 of the Draft EIR/EIS). Each day of discharge at the 150 MGD rate creates 2 to 3 days of storage capacity (depending on the magnitude of wet weather-related inflow to the sewer system). Thus, storm flows in the River preceding a flood and the rising flood hydrograph provide a large potential for reclaimed water discharge such that sufficient storage capacity is created and no discharge is necessary during flood periods.

Response to Comment 70-2

Comment Summary: The comment asks why the lower Russian River area was not analyzed as an affected area or a low income community

This comment relates to the discussion of Environmental Justice in Section 4.18 of the Draft EIR/EIS. As stated on page 4.18-30, "Environmental justice relates to whether a population is exposed to disproportionately high negative environmental impacts....The concept is usually applied to projects that clearly involve strong negative environmental impacts, such as the location of toxic waste sites." Thus, the affected environment for this section of the analysis is defined as the area where the proposed pump stations, storage tanks, pipelines and reservoirs would be located as these have a clear, direct environmental impact.

The Draft EIR/EIS has evaluated impacts of discharge to the Russian River. 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). The Draft EIR/EIS also determined that potential flooding impacts could be avoided by mitigation (Refer to Response to Comment 70-1). The Draft EIR/EIS has thus identified no impacts on lower Russian River residents that could not be mitigated.

The impact of increasing the discharge into the River on the region's tourism, is speculative, and is not a direct environmental impact, and thus not evaluated in Section 4.18 of the Draft EIR/EIS. The discussion of Environmental Justice does not evaluate all impacts on any low income community in the Service Area, but looks at whether the direct environmental impacts associated with the project will disproportionately affect low income or minority communities. As stated on page 4.18-30, for this analysis a low income community is defined as an area with a disproportionate share of low income residents, i.e., residents with an average income of less than 80% of the average County per capita income. According to 1990 census data for the census tracts comprising the Russian River area as defined by the Association of Bay Area Governments (which includes only areas below Mark West Creek), the per capita income was $16,498. As this is greater than 80% of the 1990 Sonoma County per capita income of $17,239, the lower Russian River would not be considered a low income community.

Refer to Master Response 7, located in Section 6.2 of this document, regarding impacts on tourism.