

**COMMENT LETTER 81 - FRANCES M. SHURTLIFF (SEPTEMBER 29, 1996),
RECEIVED OCTOBER 4, 1996**

Response to Comment 81-1

Comment Summary: The comment states that the City of Santa Rosa may approve a project despite the EIR for the project identifying significant adverse impacts and that the city must prepare findings of overriding consideration for significant impacts prior to approval of the project.

The comment is largely correct. However, findings of overriding consideration must be prepared only for significant impacts that cannot be mitigated to a level that is less than significant before the Project can be approved.

Response to Comment 81-2

Comment Summary: The comment states that the CD containing the Draft EIR/EIS is too costly and there are 2 volumes of the Draft EIR/EIS missing from the CD. In addition, the Draft EIR/EIS was only available at a few libraries and therefore there was a problem with availability.

Refer to Master Response 3, located in Section 6.2 of this document, which deals with the availability and cost of the Draft EIR/EIS.

Response to Comment 81-3

Comment Summary: The comment states that Figure 1-4 on page 1-8 of the Draft EIR/EIS indicates that the Draft EIR/EIS was being prepared from June 1994 to August 7, 1996. The comment further notes that the property owners had from August 1996 to October 1996 to read 17 volumes (minus 2) and to consider the consequences and respond. It states that people in the West County had to drive quite a distance to get access to the documents.

Figure 1-4 on page 1-8 of the Draft EIR/EIS actually indicates that preparation of the Draft EIR/EIS began in September 1995, not June 1994. Background studies, such as biological resource field surveys, for the project were begun by June 1994 and continued through the commencement of Draft EIR/EIS preparation in September 1995. The issues of availability and time for review of the document are addressed in Master Responses 3 and 4, located in section 6.2 of this document.

Response to Comment 81-4

Comment Summary: The comment states that it is known that disease causing organisms can survive the filtration process but Santa Rosa measures coliforms in only one of the three chlorine contact chambers to determine if pathogens have survived the process. The comment further asserts that these standards allow for considerable risk and claims that exposure to even tertiary effluent can cause disease and diluted effluent is not safe either.

The assertion that monitoring coliform in only one of three chlorine contact chambers “allows considerable risk” is unsubstantiated and incorrect. The Regional Board permits monitoring of disinfection in one of the three chambers because flow is split evenly into the chambers and they have equally effective disinfection capability. The Regional Board considers measurements in one of the chambers to be representative of measurements in the other chambers. Section 4.7 of the Draft EIR/EIS reports results of a Human Health Risk Assessment, which concludes that use of reclaimed water would not adversely affect human health as a result of exposure to pathogens. Also refer to Master Response 8, located in Section 6.2 of this document.

Response to Comment 81-5

Comment Summary: The comment asks how long it will take to contaminate groundwater.

Refer to Response to Comment 80-4.

Response to Comment 81-6

Comment Summary: The comment states that the City of Santa Rosa is considering condemning 19,400 acres of land in West County which would change the environment and alter a fragile biosystem. The comment notes that there are people who want the treated wastewater in the areas north of Santa Rosa and that the water is not wanted in the West County.

Refer to the response for Comment 79-1 regarding condemnation. Refer to Master Response 6, located in Section 6.2 of this document, regarding willingness to use reclaimed water in West County.