

**PUBLIC HEARING COMMENT 200 - MIKE REILLY, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 200-1**

*Comment Summary: The comment briefly recaps the past 11 year history of the project and objects to the Draft EIR/EIS conclusion that discharge to the Russian River is the least costly and environmentally preferred alternative.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-1.

**Response to Comment 200-2**

*Comment Summary: The comment states that the Draft EIR/EIS is first and foremost a plan to accommodate future growth in Sonoma County.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-2.

**Response to Comment 200-3**

*Comment Summary: The comment states that the Russian River should not be jeopardized to promote growth in Sonoma County.*

The Draft EIR/EIS has evaluated 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). Section 4.6 found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (see page 4.6-150). However, with implementation of cumulative projects to reduce nutrient inputs to the Laguna, and with mitigation proposed for Project impacts, the analysis concluded that 20% design discharge to the Laguna can be implemented without significant water quality impacts.

**Response to Comment 200-4**

*Comment Summary: The comment states that the Draft EIR/EIS excludes the study of small storage facilities. The irrigation-reuse alternatives are all burdened with the costs of large storage facilities which is a major barrier to the economic viability of the reuse alternatives.*

This commentor also submitted this comment in writing. Refer to Master Response 14, located in Section 6.2 of this document.

### **Response to Comment 200-5**

*Comment Summary: The comment states that the cost benefit analysis concludes that there are significant economic benefits to expanded agricultural reuse but none to Russian River discharge.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-5.

### **Response to Comment 200-6**

*Comment Summary: The comment states that the Draft EIR/EIS fails to explore a phased, pay-as-you-go project involving many smaller storage sites and the potential for cost participation for farmers through government grants and loans.*

The commentor also submitted this comment in writing. Refer to Master Response 14, located in Section 6.2 of this document.

### **Response to Comment 200-7**

*Comment Summary: The comment states that there is growing evidence that the cost of the Geysers alternative could be greatly reduced through changing the route, downsizing the pipe, and operational cost sharing which was not factored into the study.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-7.

### **Response to Comment 200-8**

*Comment Summary: The comment states that there are irrigation options that were not adequately investigated in the Draft EIR/EIS.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-8.

### **Response to Comment 200-9**

*Comment Summary: The comment states that injecting into the Geysers at a lower flow rate would reduce the stimulation of seismic activity and could allow for continuation and expansion of agricultural reuse.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-9.

### **Response to Comment 200-10**

*Comment Summary: The comment states that the Draft EIR/EIS is inadequate in addressing the potential impacts of discharge to the Russian River 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 200-11**

*Comment Summary: The comment states that the commentor has documentation of those impacts from 1985 when the City paid hundreds of thousand of dollars in damages to the river economy.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-11.

### **Response to Comment 200-12**

*Comment Summary: The comment states that any decision to pursue discharge to the Russian River 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 200-13**

*Comment Summary: The comment states that while West County storage alternatives included water aqueducts to provide wells, no such mitigation was proposed for the Laguna alternative, despite the fact the City wells in Sebastopol draw 70 percent of their water from there. .*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 47-13.

### **Response to Comment 200-14**

*Comment Summary: The comment restates opposition to any increase in discharge to the Russian and encourages augmentation of water resources through reclamation.*

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 47-17 and 47-18.

### **Response to Comment 200-15**

*Comment Summary: The comment urges inclusion of affordable small scale reuse alternatives.*

Refer to Master Response 14, located in Section 6.2 of this document, regarding small storage options.

**PUBLIC HEARING COMMENT 201 - JAMES SORRELLS, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 201-16**

*Comment Summary: The comment states that the Draft EIR/EIS does not adequately address the potential impact on tourism of increasing discharge into the Russian River, with only three and one-half pages out of 8,500 addressing the impact on tourism.*

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

**Response to Comment 201-17**

*Comment Summary: The comment states that the EIR/EIS acknowledges that development may add to flooding in the Russian River.*

Page 4.4-34 of the Draft EIR/EIS identifies the cumulative impact on flooding (Impact 4.4C) as significant, and includes mitigation to avoid Project impacts. Refer also to Response to Comment 85-81.

**Response to Comment 201-18**

*Comment Summary: The comment states that the Draft EIR/EIS acknowledges that publicity and education may not convince the public that the discharge has not made the Russian River unhealthy and unsafe.*

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

**Response to Comment 201-19**

*Comment Summary: The comment states that the Draft EIR/EIS does not provide an economic analysis of impacts to Russian River tourism if flooding or negative public perception occurs.*

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

**Response to Comment 201-20**

*Comment Summary: The comment states that there is no economic analysis in the Draft EIR/EIS of the impacts from dropping property values, sales taxes collected, diminished transient occupancy and property, lost jobs, failed businesses, and the overall effect on Sonoma County's economic base because of project impacts to Russian River tourism.*

Refer to Master Response 7, located in Section 6.2 of this document, regarding impacts to the tourist economy. Table 4.18 in Section 4.18 of the Draft EIR/EIS (pages 4.18-49 and 4.18-50) concludes that Alternative 5A (Russian River Discharge) will have a negative net economic effect on the economy in terms of employment and income.

#### **Response to Comment 201-21**

*Comment Summary: The comment states that the Russian River Visitors Bureau has not been able to find any resort owner who was interviewed and asks for the release of the list of the resort owners interviewed and the questions that were asked.*

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

#### **Response to Comment 201-22**

*Comment Summary: The comment states that the Russian River Visitors Bureau conducted its own surveys of resort owners and real estate professionals regarding the impacts from increased discharge, results of which will be made available to the public and press. The comment also insists that none of the alternatives be chosen without a careful examination of the impact on tourism.*

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

**PUBLIC HEARING COMMENT 202 - NORMAN GRIB, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 202-23**

*Comment Summary: The comment expresses concern about impacts on drinking water quality of the Sweetwater Springs Water District wells.*

Evaluation of discharge impacts on groundwater has found that there will be no effect on downstream wells. Refer to the discussion on page 4.5-56 of the Draft EIR/EIS. In addition, communications with the Department of Health Services have indicated that the Sweetwater Springs wells are definitely off-stream, and, their water quality is significantly different than that of the river; therefore there should be no concern regarding discharge impacts on water supply.

**Response to Comment 202-24**

*Comment Summary: The comment states that the Clean Water Act has a goal of zero discharge, and expresses support for agricultural irrigation of reclaimed water.*

Refer to Master Response 2, regarding Project selection, and Master Response 15 for a discussion of zero discharge. These Master Responses are located in Section 6.2 of this document.





**PUBLIC HEARING COMMENT 203 - DANIEL WICKHAM, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 203-25**

*Comment Summary: The comment references a report that reviews the agricultural irrigation component of the project and recommends use of redwood irrigation. The comment states that the report shows that the City currently is able to achieve zero discharge using conventional surface sprinkler irrigation of pasture for a major portion of the year. The referenced report was submitted as a comment letter.*

Refer to Master Response 18, located in Section 6.2 of this document, regarding irrigation with redwoods and to Master Response 15 concerning zero discharge. The comment is correct in stating that the City is able to comply with its seasonal discharge prohibition, which prohibits any discharge from May 15 until October 1.

**Response to Comment 203-26**

*Comment Summary: The comment states that conventional surface sprinkler irrigation of pasture is only modestly effective and achieves its highest application rate only during the dry summer months.*

The comment is correct in stating that the current irrigation system operates primarily during the summer. City staff have reviewed the irrigation rate of 4,200 gallons per acre per day presented in the comment and estimate that the actual rate during the 90-day period from June to August is closer to 6,000 gallons per acre per day. Of course, the actual rate varies with weather conditions.

**Response to Comment 203-27**

*Comment Summary: The comment states that the weakness of this type of irrigation is that it cannot be applied during the wet winter months and there are other forms of irrigation and other crops besides grass that can be irrigated.*

The comment is correct in stating that under the existing system, irrigation generally cannot be practiced during the winter months. Winter irrigation only occurs during dry winters.

**Response to Comment 203-28**

*Comment Summary: The comment states that other forms of irrigation and other crops should have been investigated, and there is no evidence that this was done.*

The Project description is based on implementing an agricultural irrigation system by contracting with existing landowners to use reclaimed water. The Draft EIR/EIS has assessed changes in cropping patterns that might be implemented by existing landowners

if irrigation water was available. Because it is not the City's intent to tell landowners what they can grow on their land, crop and irrigation alternatives were not evaluated from the perspective of maximizing water use, but rather from the perspective of what it might be reasonable to expect existing users to do with their own property. The purpose of Draft EIR/EIS was to evaluate the impacts of providing irrigation water, not to develop a new type of cropping system for West County or South County users, or to evaluate the effectiveness of the existing irrigation system.

### **Response to Comment 203-29**

*Comment Summary: The comment references a report reviewing documentation of an irrigation system that uses a subsurface emitter designed for redwood tree crops that achieves irrigation rates significantly higher than those of the system proposed in the EIR. The referenced report was submitted as a comment letter.*

Refer to Master Response 18, located in Section 6.2 of this document, regarding irrigation of redwoods.

### **Response to Comment 203-30**

*Comment Summary: The comment states the report referenced in Comment 203-29 shows that each of the six projects identified in the EIR fails because of their inability to irrigate during winter months.*

Each of the alternatives has been determined to be capable of providing adequate disposal and reuse flows from the Laguna Treatment Plant. Refer to Appendix D-8 (Water Balance Model Summary and Results), which shows allocation of reclaimed water to irrigation, storage, and discharge. Each of the alternatives uses irrigation during dry winters as part of the Contingency Program.

### **Response to Comment 203-31**

*Comment Summary: The comment proposes that the City plant redwood plantations to be irrigated by the method in the referenced report. This report was submitted as a comment letter.*

Refer to Master Response 18, located in Section 6.2 of this document, regarding irrigation of redwoods.

**PUBLIC HEARING COMMENT 204 - ROBERT RAWSON, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 204-32**

*Comment Summary: The comment suggests that the Draft EIR/EIS has identified 20% Russian River Discharge as the environmentally superior alternative based on cost; and urges zero discharge.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 46-1. Also refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge.

**Response to Comment 204-33**

*Comment Summary: The comment recommends evaluation of a year-round subsurface irrigation system using redwoods as described by Dr. Wickham.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 18, located in Section 6.2 of this document, regarding irrigation of redwoods.



**PUBLIC HEARING COMMENT 205 - RICHARD CHARTER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 205-34**

*Comment Summary: The comment states that there has not been valid public circulation of the Draft EIR/EIS due to the expense required to purchase the documents.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 3, located in section 6.2 of this document.

**Response to Comment 205-35**

*Comment Summary: The comment states that there were an inadequate number of volumes of the Draft EIR/EIS at the local libraries to review.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 3, located in section 6.2 of this document.

**Response to Comment 205-36**

*Comment Summary: The comment states that the Draft EIR/EIS is asking the wrong questions. It does not explore the ultimate carrying capacity of the Santa Rosa Plain to support increasing urbanization.*

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 92-59 and 92-60.

**Response to Comment 205-37**

*Comment Summary: The comment states that the DEIR/EIS fails to provide a meaningful ecological risk assessment from which decision makers and the public can draw realistic conclusions.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 92-61.

**Response to Comment 205-38**

*Comment Summary: The comment states that the Draft EIR/EIS did not consider the full range of possible disposal options.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 92-3.

### **Response to Comment 205-39**

*Comment Summary: The comment states that the focus of the Draft EIR/EIS on identification of arbitrary levels of significance and emphasis on hypothetical mitigation measures diminishing significant impacts to less than significant is deceptive.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 92-63.

### **Response to Comment 205-40**

*Comment Summary: The comment states that the Draft EIR/EIS fails to consider the effects of potential nitrate impacts on groundwater in the shallow water-table of the Two Rock-Bloomfield area from wastewater storage and spraying and applications of newly required fertilizers.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 92-66.

### **Response to Comment 205-41**

*Comment Summary: The comment states that we are not applying our knowledge in such a way as to tread lightly on our surrounding ecosystems.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 92-69.

**PUBLIC HEARING COMMENT 206 - DICK SHANNON, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 206-42**

*Comment Summary: This comment states that in section 3.2 of the Draft EIR/EIS reference is made to cancellation of Williamson Act contracts due to parcels being used as one of the alternatives. The comment further states that the EIR does not say that the parcels will need to be condemned in order to do this and that the Williamson Act states that no condemnation of contracted land shall take place if there is other land on which it is reasonably feasible to locate the public improvement; therefore, the West County alternative cannot be implemented.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 120-16.

**Response to Comment 206-43**

*Comment Summary: The comment suggests that the EIR/EIS does not reflect limitation on growing various crops in West County.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 120-18.





**PUBLIC HEARING COMMENT 207 - JOE TRESCH, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 207-44**

*Comment Summary: The comment states that there is a discrepancy between what the Draft EIR/EIS says and the Sonoma County Aggregate Resource Management Plan says about the amount of aggregate rock located at the Two Rock dam site that will have to be moved prior to construction.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 128-13.

**Response to Comment 207-45**

*Comment Summary: The comment states that the value of the aggregate could be between 50 cents to \$1.25 a ton and if his property is condemned for this Project an attorney will have a field day with that issue.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 128-13.



**PUBLIC HEARING COMMENT 208 - RUE FURCH, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 208-46**

*Comment Summary: The comment expresses appreciation for the City's commitment to the public process, and encourages the City to explore expanding their efforts in emergency water conservation to reduce wastewater discharge.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 30-1.

**Response to Comment 208-47**

*Comment Summary: The comment states that from an economic perspective, agricultural reuse is the only alternative that creates revenues.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 30-2.

**Response to Comment 208-48**

*Comment Summary: The comment states that discharge to the Russian River represents a net cost with no benefits and is contrary to the primary objective of reuse and reclamation.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 30-3.

As stated in Section 3.3 of the Draft EIR/EIS, the City will attempt to purchase the sites for Project facilities, but if necessary, will use its powers of condemnation. Also refer to Response to Comment 64-6.

**Response to Comment 208-49**

*Comment Summary: The comment states that wastewater and reclaimed water is needed in the future for farmland to remain viable and productive, and that the reclaimed water has an economic value for the users of the City of Santa Rosa Subregional System. The comment calls for the City of Santa Rosa to remain committed to reclamation to acquiring land for reservoirs or irrigation only from willing sellers and to select a project that is based on a comprehensive cost-benefit perspective.*

One of the City's objectives is to "Maximize reclamation, recycling and reuse of advanced treated wastewater to the greatest extent feasible" as stated in the Draft EIR/EIS (page 1-3). The Draft EIR/EIS also recognizes the value of reclaimed water to agriculture. Refer to Responses to Comments 208-47 and 30-2.

### **Response to Comment 208-50**

*Comment Summary: The comment supports a phased solution that could involve partnerships between developers, agriculturists, and municipalities.*

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

### **Response to Comment 208-51**

*Comment Summary: The comment suggests a system of buffers.*

Refer to Response to Comment 24-6 regarding buffers, and Master Response 18, located in Section 6.2 of this document, regarding Dr. Wickham's proposal.

### **Response to Comment 208-52**

*Comment Summary: The comment suggests a phased project, using public-private partnerships.*

Refer to Master Response 14, located in Section 6.2 of this document.

**PUBLIC HEARING COMMENT 209 - ED GROSSI, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 209-53**

*Comment Summary: The comment suggests a phased project with small to medium size storage sites.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document.

**Response to Comment 209-54**

*Comment Summary: The comment provides a discussion of how to make the farm community an active partner in the project.*

The City of Santa Rosa welcomes collaboration with farmers and investors, and certainly prefers a project that only involves willing landowners. Irrigation contracts will involve willing landowners; there is no proposal to condemn irrigation land. However, it may not be possible to implement a project that requires a new storage reservoir working solely with willing landowners. Refer to Master Response 14, located in Section 6.2 of this document, for a discussion of permitting requirements for small reservoirs.

**Response to Comment 209-55**

*Comment Summary: The comment recommends use of smaller storage sites.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document.

**Response to Comment 209-56**

*Comment Summary: The comment suggests a phased project.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document.



**PUBLIC HEARING COMMENT 210 - SCOT STEGEMAN, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 210-57**

*Comment Summary: The comment states that discussion of the costs of the project have been too narrowly focused and that a broader regional economic perspective would recognize the benefits of reuse for irrigation, open space and recreation.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-2.

**Response to Comment 210-58**

*Comment Summary: The comment states that discussion of the costs of the project have obscured the regional economic benefits of reuse for irrigation, open space and recreation. The comment also states that there is no economic return from a river discharge alternative, and cites examples of increased farm income from higher quality or value added products by local agriculture.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-2.

**Response to Comment 210-59**

*Comment Summary: The comment describes the “multiplier” effect in relation to the circulation of additional income in the greater Sonoma County community.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-3.

**Response to Comment 210-60**

*Comment Summary: The comment states an opinion that the priority should be to design a project that maximizes the economic value of a scarce resource, and recaptures a portion of that value to offset project costs. The comment also states that choosing the “cheapest” project may involve hidden costs and lost opportunities.*

Refer to Master Response 2, located in Section 6.2 of this document, which discusses project selection.

### **Response to Comment 210-61**

*Comment Summary: The comment urges phasing, buffers and small storage sites.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14 regarding phasing and small storage reservoirs, and Response to Comment 24-6 regarding buffers. The Master Responses are located in Section 6.2 of this document.

### **Response to Comment 210-62**

*Comment Summary: The comment states that in relation to cost and ratepayer impacts, additional funding opportunities with agriculture need to be addressed, resulting in cost-reductions for the ratepayer.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-6.

### **Response to Comment 210-63**

*Comment Summary: The comment states that there should be recognition of external costs of the alternatives as well as benefits, and that there should be acknowledgment that costs will be borne by others outside the system.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-7.

### **Response to Comment 210-64**

*Comment Summary: The comment asserts that the Draft EIR/EIS reinforces a pattern of describing possible projects in their most extreme form and, therefore, tends to divide the community and create projects that are easy targets for different interest groups.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 51-8.



**PUBLIC HEARING COMMENT 211 - ANNE SEELY, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 211-65**

*Comment Summary: The comment recommends a phased project.*

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

**Response to Comment 211-66**

*Comment Summary: The comment states that with a front-loaded big money project, if the City growth slows, the current rate payers suffer under the burden of greatly increased rates to pay for future growth and rising hookup costs for new housing and businesses, including restaurants, increase to make affordability almost impossible.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 48-2.

**Response to Comment 211-67**

*Comment Summary: The comment recommends phasing as a way to build trust in the farming community.*

Refer to Master Response 14, located in Section 6.2 of this document, regarding phasing.

**Response to Comment 211-68**

*Comment Summary: The comment recommends phasing and maximum reuse of reclaimed water, and suggests that a phased project would be less likely to be a subject of a lawsuit.*

This comment was also submitted in writing by the commentor, and is responded to in Response to Comment 48-4 and Master Response 14, located in Section 6.2 of this document.



**PUBLIC HEARING COMMENT 212 - ALAN STRACHAN, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 212-69**

*Comment Summary: The comment requests consideration of a phased project using small reservoirs in a public-private partnership.*

Refer to Master Response 14 regarding a phased Project, and small reservoirs. The Master Responses are located in Section 6.2 of this document.

**Response to Comment 212-70**

*Comment Summary: The comment cites information from the Draft EIR/EIS concerning the costs and benefits of reuse projects, and suggests that on economic grounds alone, it is in Santa Rosa's best interests to do a project of this type, and that it would be a serious waste to flush the water down the river.*

The comment is correct in that a South County Project could result in a net economic benefit of about \$120 million per year (see Table 4.18-18 on page 4-18.49 of the Draft EIR/EIS). However, it is incorrect to assume that this translates directly into dollars in the pockets of rate payers. As noted in the Draft EIR/EIS, page 4.18-51, "the benefits and costs do not accrue to the same population groups. The benefits primarily accrue to farmers who will use the reclaimed water and their suppliers. The services charge increase impacts all of the rate payers."



**PUBLIC HEARING COMMENT 213 - BILL KORTUM, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 213-71**

*Comment Summary: The comment states that Laguna discharge is not correctly evaluated because at the end of the project discharge would be 45 or 50 percent rather than 25.*

The water balance calculations evaluated the discharge percentage at build out of the General Plans that were in effect in April 1994. At the end of the Project at build-out normal discharge will not exceed 20 percent, and the maximum monthly contingency discharge will be 28.3 percent. Contingency discharges were projected to take place in only 5 months over the 70-year period evaluated in the water balance model. Higher percentage discharges will not necessarily be associated with higher wastewater flows at buildout, but are a function of extremely dry winters, when there is very little flow in the Russian River.

**Response to Comment 213-72**

*Comment Summary: The comment states that the Draft EIR/EIS does not consider benefits to agriculture and preservation of open space.*

Benefits to agriculture are identified in Section 4.18, Socio-economics, of the Draft EIR/EIS. Refer to Table 4.18-17 on page 4.18-39 of the Draft EIR/EIS, which estimates potential value of new irrigated crops, and to Table 4.18-18 on page 4.18-49 of the Draft EIR/EIS, which shows overall economic benefits of each alternative. The cumulative analysis on page 4.2-28 of Section 4.2, Agriculture, of the Draft EIR/EIS states that "Provision of reclaimed water, and implementation of long-term contracts with agricultural users will enhance productivity of existing agricultural lands, provide substantial economic benefits (see Socio-economics Section), and will tend to maintain lands in agricultural use that might otherwise be converted to other uses. The availability of reclaimed water may be a major factor in reducing loss of agricultural lands in Sonoma County."

**Response to Comment 213-73**

*Comment Summary: The comment states that the Draft EIR/EIS fails to recognize that reuse, particularly for urban irrigation, would enhance water resources, and reduce future need for new water resources.*

The City has stated an objective which includes "wise use of water resources" (see 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 components will, in part, replace 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 will provide irrigation of areas that are currently not irrigated, and will thus not augment drinking water supplies. These, and a variety of other issues will be considered in Project selection.

#### **Response to Comment 213-74**

*Comment Summary: The comment states that alternatives other than Laguna discharge are "vastly overpriced".*

Refer to Response to Comment 26-3.

#### **Response to Comment 213-75**

*Comment Summary: The comment recommends a partnership with Petaluma.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 38-8.

#### **Response to Comment 213-76**

*Comment Summary: The comment suggests that stormwater diversion facilities are not necessary at reservoir sites.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 38-9.

#### **Response to Comment 213-77**

*Comment Summary: The comment states that pipeline design does not consider the use of transmission lines for distribution to users.*

The comment is incorrect; transmission lines are used to deliver water to users. The commentor also submitted this comment in writing, and it is responded to in Response to Comment 38-10.

#### **Response to Comment 213-78**

*Comment Summary: The comment suggests cost savings of about \$80 million by eliminating stormwater diversion, reducing costs of pipelines, and a partnership with Petaluma.*

Elimination of stormwater diversion is not feasible (refer to Response to Comment 38-9), and transmission lines do also serve to distribute water to users. It is not possible to verify the comment's conclusion that savings of \$20 million could result from partnership with Petaluma, because no supporting data are provided.

### **Response to Comment 213-79**

*Comment Summary: The comment addresses the carrying costs of the debt service for the project.*

Refer to Response to Comment 38-11.

### **Response to Comment 213-80**

*Comment Summary: The comment requests consideration of small reservoir sites.*

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

### **Response to Comment 213-81**

*Comment Summary: The comment requests consideration of a transmission line to South County with the potential of irrigating along the way.*

The design of the transmission line to South County does include supplying potential users along the route.

### **Response to Comment 213-82**

*Comment Summary: The comment states that the Draft EIR/EIS fails to recognize that the availability of Baylands in the South County allows future expansion of this alternative.*

The Project is designed to accommodate the reclaimed water flows at buildout of the General Plans of the Subregional System members. Evaluation of future expansion is highly speculative and beyond the scope of this Draft EIR/EIS.

### **Response to Comment 213-83**

*Comment Summary: The comment states that there is no discussion in the Draft EIR/EIS concerning what happens at buildout.*

There is no discussion concerning what happens at buildout because the purpose and need of the Project is defined as putting a reclaimed water disposal solution in place that meets the reliability requirements and existing and future capacity needs of the Subregional System. The volume of water that must be accommodated is based on a number of parameters, but is based largely on the buildout of the Subregional System's member entities as approved in their adopted general plans. How additional growth and the need for new infrastructure will be dealt with after general plan buildout is not part of this Project. In addition, any discussion that could be provided in the Draft EIR/EIS will have to be considered speculative given the length of time between certification of this EIR and expected buildout of the general plans. As identified in Section 15145 of the State

CEQA Guidelines, an EIR is expected to terminate discussion of potential impacts when a thorough investigation is unable to resolve an issue and the answer remains purely speculative. This guidance is expected to be invoked especially when attempting to forecast future impacts. Attempting to forecast what direction local general plans will take in approximately the year 2010 remains entirely speculative.



**PUBLIC HEARING COMMENT 214 - RICHARD CARLILE, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 214-84**

*Comment Summary: The comment suggests consideration of project phasing.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document, concerning a phased Project.

**Response to Comment 214-85**

*Comment Summary: The comment suggests use of small reservoirs.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document, concerning use of small reservoirs.

**Response to Comment 214-86**

*Comment Summary: The comment suggests implementation of projects similar to the Gallo Project, with use of buffer areas.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14, located in Section 6.2 of this document, regarding project phasing. The proposed project includes a Contingency Plan, which is analogous to the suggested buffer areas. Refer to Response to Comment 24-6 regarding buffer areas.



**PUBLIC HEARING COMMENT 215 - PAULA BLAYDES, (SEPTEMBER 24, 1996),  
RECEIVED SEPTEMBER 24, 1996**

**Response to Comment 215-87**

*Comment Summary: The comment suggests that the Environmentally Superior Alternative was selected on the basis of costs.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 26-1.

**Response to Comment 215-88**

*Comment Summary: Regarding the November 1995 Cost Study performed for the project, the comment suggests that the costs are misleading because they do not address costs for realistic project designs, known as Value Engineering.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 26-2.

**Response to Comment 215-89**

*Comment Summary: Regarding the November 1995 Cost Study performed for the project, the comment suggests the data used for the alternative projects cost estimates are misleading because they include contingency and adders that are compounded to raise the estimated construction costs 55 percent, and they include 20 years of estimated operation and maintenance costs and 20 years of (6.5 percent) interest rates for financing.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 26-3.

**Response to Comments 215-90 and 215-91**

*Comment Summary: Regarding the November 1995 Cost Study performed for the project, the comments question the accuracy of the data, citing the Geysers pipeline route as an example and indicating that the Consultants engineer preparing the piping cost estimates felt the costs were at least 10 percent high. The comments also indicate that any inaccuracies are magnified by the 55 percent adder and that the result is unrealistic pricing.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comments 26-4 and 26-5.

### **Response to Comment 215-92**

*Comment Summary: The comment states that the Draft EIR/EIS only considered a proposed Geysers pipeline route along Pine Flat Road, which would include \$8 million dollars to repave the road. The comment also suggests that other possible alignments would avoid this repave cost and would shorten the pipeline.*

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 26-6.

### **Response to Comment 215-93**

*Comment Summary: The comment urges the inclusion of more realistic project alternative cost estimates. This comment was also submitted in writing.*

As discussed in Responses to Comments 26-2 through 26-6, the cost analysis is deemed to be adequate for purposes of environmental review. The purpose of the Draft EIR/EIS is to evaluate environmental impacts of Project alternatives, not to develop the most cost-effective geysers proposal.

### **Response to Comment 215-94**

*Comment Summary: The comment suggests consideration of project phasing and smaller irrigation projects.*

The commentor also submitted this comment in writing, and it is responded to in Master Response 14 regarding phasing and small reservoirs. The Master Responses are located in Section 6.2 of this document.