

**PUBLIC HEARING COMMENT 216 - BILL MAILLIARD, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 216-95

Comment Summary: The comment urges consideration of projects that incorporate phaseability, economic responsibility, environmental responsibility, and room for public private partnership.

The City's objectives, as described on page 1-3 of the Draft EIR/EIS, include environmentally responsible goals such as "wise use of water resources", "protection of beneficial uses of receiving waters", and "protect public health and safety". The City's objectives also include "Develop a program that can be successfully financed and is economically feasible." Refer to Master Response 14, located in Section 6.2 of this document, regarding a phased Project and public/private partnerships.

Response to Comment 216-96

Comment Summary: The comment states that the comparison of costs in the Draft EIR/EIS is misleading.

Costs for alternatives were developed using a comparable methodology. The comment provides no details regarding how the costs may be misleading, so a more specific response is not possible.

Response to Comment 216-97

Comment Summary: The comment states that the ability to implement river discharge is subject to federal and state regulations, and thus is not reliable.

The alternatives are subject to regulations that may change in the future. Decision makers will have to consider these issues in selection of a Project.

**PUBLIC HEARING COMMENT 217 - JIM JACOBS, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 217-98

Comment Summary: The comment asserts that the results of a 1994 preliminary survey of landowner interest in using reclaimed water have been incorrectly used to justify the West County Alternative to the public.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 78-1 and to Master Response 6, located in Section 6.2 of this document.

Response to Comment 217-99

Comment Summary: The comment provides an opinion that there are insufficient willing landowners in the west county to make the West County alternative feasible to operate.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 78-1 and 78-3 and to Master Response 6, located in Section 6.2 of this document.

**PUBLIC HEARING COMMENT 218 - KATHY TRESCH, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 218-100

Comment Summary: The comment states that it would have been nice to have an index and a glossary in the Draft EIR/EIS.

A glossary was provided in the Draft EIR/EIS and is located immediately after Chapter 5 in Volume 3 of the Draft EIR/EIS. The Draft EIR/EIS provides a table of contents which is sufficient to allow the reader to navigate through the document and find pertinent sections or analysis that they may be particularly interested in. In addition, Chapter 1 of the Draft EIR/EIS provides an index of key issues to be resolved that directs the reader to the appropriate part of the Draft EIR/EIS for discussion of those issues.

Response to Comment 218-101

Comment Summary: The comment references the evaluation of inundation due to catastrophic dam failure, and suggests that one mitigation should be scuba gear and a submarine for the volunteer fire department.

The Draft EIR/EIS has included extensive mitigation to prevent dam failure, and has concluded that the risk of failure is not significant. Refer to Response to Comment 93-6 for further discussion of dam safety.

Response to Comment 218-102

Comment Summary: The comment expresses disagreement that a West County irrigation project is crucial to agriculture.

The Draft EIR/EIS does not state that a reclaimed water irrigation project is crucial to agriculture. It identifies impacts to agriculture in Section 4.2, and projects potential economic benefits to agriculture in Section 4.18, beginning on page 4.18-38.

Response to Comment 218-103

Comment Summary: The comment states that Section 1.1 of Chapter 1 does not acknowledge property owners purpose and need for the land that is under consideration for dam sites.

Section 1.1 describes the purpose and need for the Subregional Long-Term Wastewater Project and is not intended to provide an evaluation of existing land uses in the Project area. Refer to Section 4.1 of the Draft EIR/EIS, which discusses existing land use, and Section 4.2, which discusses impacts to agriculture.

Response to Comment 218-104

Comment Summary: The comment states that costs of mitigation measures are not presented in the Draft EIR/EIS, and expresses particular concern about mitigation for reservoir sites.

Mitigation is included in the cost estimates. Specific costs are included where possible, and a 25 percent construction contingency also provides for additional mitigation costs which could not be costed specifically. Reservoir mitigation costs are presented in Table 3.8 of Appendix D-30 (Alternative Projects Construction Cost Estimate), of the Draft EIR/EIS. Mitigation will not double reservoir costs.

Response to Comment 218-105

Comment Summary: The comment states that mitigation measures such as filter strips are unproven.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 128-23.

Response to Comment 218-106

Comment Summary: The comment expresses concern that the Subregional Sludge Beneficial Use Project has been included in the Long-Term Wastewater Project.

The sludge project has not been included in the Long-Term Wastewater Project. The commentor also submitted this comment in writing, and it is responded to in Response to Comment 128-19.

Response to Comment 218-107

Comment Summary: The comment expresses concern about impacts of contingency irrigation in the winter months.

Contingency irrigation will be managed so as to not adversely effect agricultural areas, and participation in the contingency program will be voluntary. The commentor also submitted similar comments in writing, and they are responded to in Responses to Comments 128-20 and 128-22.

Response to Comment 218-108

Comment Summary: The comment states that mitigation could not replace what would be destroyed by a reservoir at the Button Ranch site .

Refer to Response to Comment 95-51.

Response to Comment 218-109

Comment Summary: The comment states that impacts to raptor nests as a result of construction of any of the large West County reservoirs are not adequately addressed in the DEIR/EIS.

Refer to Response to Comment 95-53.

Response to Comment 218-110

Comment Summary: The comment states that impacts to perennial streams as a result of construction of any of the large West County reservoirs are not adequately addressed in the Draft EIR/EIS.

Impacts to perennial streams due to construction of the West County reservoir sites are discussed on Pages 4.9-55 through 4.9-74 of the Draft EIR/EIS. The comment does not provide information as to why these impacts are not adequately addressed in the DEIR/EIS, no further response is possible.

Response to Comment 218-111

Comment Summary: The comment states that the commentors' way of life as cohabitants in the proposed reservoir sites is not adequately addressed.

Refer to Response to Comment 218-103 regarding existing land use and impacts on agriculture. The Draft EIR/EIS has also evaluated socioeconomic impacts in Section 4.18.

Response to Comment 218-112

Comment Summary: The comment states that the storage reservoir sites in West County should not be developed in order to avoid impacts to the environment.

This comment expresses an opinion regarding Project selection. Refer to Master Response 2, located in Section 6.2 of this document.

Response to Comment 218-113

Comment Summary: The comment expresses concern for preservation of the natural environment.

Because no specific comment is made regarding the Draft EIR/EIS, no response is possible.

PUBLIC HEARING COMMENT 219 - ELISABETH GUNTHER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 219-114

Comment Summary: The comment states that these oral comments are presented on behalf of Dr. Lee W. Schaller who owns agricultural property that would be affected by the Tolay Extended alternative. The comment states that Dr. Schaller strongly opposes selection of the Tolay Extended alternative.

The comment expresses an opinion regarding Project selection and does not address the adequacy of the analyses or information within the Draft EIR/EIS. Refer to Master Response 2, located in Section 6.2 of this document, regarding Project selection.

Response to Comment 219-115

Comment Summary: The comment states that the Tolay Extended alternative is environmentally inferior, has disproportionate costs to its benefits, and as such is not a viable alternative and should be eliminated from consideration.

It is not within the scope of the Draft EIR/EIS to eliminate alternatives, but its purpose is rather to disclose impacts of alternatives. Refer to Response to Comment 5-9.

Response to Comment 219-116

Comment Summary: The comment questions the purpose of the project and states that the purpose is supposed to be disposal, but reuse seems to be driving the project. The comment also asks why the impacts of development on the environment were not given greater consideration?

The commentor also submitted a similar comment in writing, and it is responded to in Response to Comment 101-8. Levels of development are established by the General Plans of the members of the Subregional System, and the impacts of development are specifically addressed in the environmental documentation for those General Plans. A purpose of the Project is to accommodate those General Plans.

Response to Comment 219-117

Comment Summary: The comment suggests that greater consideration should have been given to conservation.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-8. Evaluation of conservation options is presented in Appendix D-2 (Water Conservation Element), of the Draft EIR/EIS.

Response to Comment 219-118

Comment Summary: The comment asks for consideration of other reuse projects such as nonpotable commercial and industrial uses, small supply alternatives, and sole user agricultural projects.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-8.

Response to Comment 219-119

Comment Summary: The comment expresses concurrence with the conclusions in the Draft EIR/EIS regarding the unavoidable significant effects of the Tolay Extended alternative.

The Draft EIR/EIS authors acknowledge the comment's agreement with the Draft EIR/EIS.

Response to Comment 219-120

Comment Summary: The comment states that the South County alternative will result in an unacceptable loss of substantial habitat and biological resources.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-19.

Response to Comment 219-121

Comment Summary: With respect to the Tolay Extended alternative, the comment states that this alternative will have significant visual impacts.

The comment is correct that this reservoir site has significant visual impacts, which are identified in the Draft EIR/EIS.

Response to Comment 219-122

Comment Summary: The comment states that the Tolay Extended alternative would result in substantial noise impacts.

Section 4.13 of the Draft EIR/EIS (page 4.13-40) concludes that the Tolay Extended reservoir will have significant, unmitigable noise impacts on nearby residences.

Response to Comment 219-123

Comment Summary: The comment indicates that there will be substantial socioeconomic impacts.

The Draft EIR/EIS identifies significant socio-economic impacts. Refer to the summary of socio-economic impacts on page 4.18-54.

Response to Comment 219-124

Comment Summary: The comment states that the Draft EIR/EIS fails to point out that there will be a substantial land use impact for the Tolay Extended alternative.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-11.

Response to Comment 219-125

Comment Summary: The comment states that the Tolay Extended alternative will result in significant noise.

Section 4.13 of the Draft EIR/EIS (page 4.13-40) concludes that the Tolay Extended reservoir will have significant, unmitigable noise impacts on nearby residences.

Response to Comment 219-126

Comment Summary: The comment states that there will be visual impacts to adjacent land owners for the Tolay Extended alternative.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-11.

Response to Comment 219-127

Comment Summary: The comment states that there will be open space impacts to adjacent land owners for the Tolay Extended alternative.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-11.

Response to Comment 219-128

Comment Summary: The comment states that there will be socio-economic impacts to adjacent land owners for the Tolay Extended alternative.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-11.

Response to Comment 219-129

Comment Summary: The comment states that the Tolay Extended alternative would result in the loss of pristine agricultural land, which is a significant and unavoidable impact.

Loss of agricultural land at the Tolay Extended reservoir site is identified in the Draft EIR/EIS in Section 4.2, Agriculture, as a significant unavoidable impact. Refer to discussion starting on page 4.2-11 of the Draft EIR/EIS.

Response to Comment 219-130

Comment Summary: The comment questions whether the mitigation measures that have been proposed to reduce the impacts associated with the Tolay Confined and Tolay Extended alternatives can reduce the impacts to a level a that is less than significant.

The commentor also submitted this comment in writing, and they are responded to in Responses to Comments 101-13, 103-14, and 101-16 through 101-23.

Response to Comment 219-131

Comment Summary: The comment expresses concern regarding seismic impacts associated with the Tolay extended alternative.

Seismic impacts are addressed in Section 4.3 of the Draft EIR/EIS. The commentor also submitted similar comments in writing, and they are responded to in Responses to Comments 101-12 and 101-13.

Response to Comment 219-132

Comment Summary: The comment expresses concern about flooding impacts associated with the Tolay extended alternative.

Flooding impacts associated with reservoir construction are discussed in Section 4.4, starting on page 4.4-25 of the Draft EIR/EIS, and were found to be less than significant. Section 4.19 of the Draft EIR/EIS discusses the potential for inundation due to dam failure.

Response to Comment 219-133

Comment Summary: The comment questions whether disruption of service impacts from a seismic event associated with the Tolay extended alternative can really be mitigated to a less than significant level.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-14 regarding disruption of service. Response to Comment 93-6 also provides additional discussion of design measures that ensure seismic safety of dams.

Response to Comment 219-134

Comment Summary: The comment questions whether the mitigation proposed for impacts to biological resources can fully mitigate the identified impacts.

The mitigation measures proposed for impacts to biological resources associated with the Tolay Reservoir site were evaluated and determined to reduce the direct Project impacts to a level that is less than significant. However, the Draft EIR/EIS does conclude that the Project will contribute to a cumulatively significant loss of terrestrial wildlife habitat. Refer to the discussion starting on page 4.8-117. The commentor also submitted similar comments in writing, and they are responded to in Responses to Comments 101-20 through 101-23.

Response to Comment 219-135

Comment Summary: The comment questions whether groundwater impacts associated with the Tolay extended alternative can really be mitigated to a less than significant level.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 101-18.

Response to Comment 219-136

Comment Summary: The comment provides an opinion concerning project selection. Specifically, the comment strongly opposes the Tolay Extended alternative.

Refer to Master Response 2, located in Section 6.2 of this document, regarding opinions about Project selection.

**PUBLIC HEARING COMMENT 220 - TONY CHASTEEN, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 220-137

Comment Summary: The comment requests evaluation of 1% Russian River discharge in conjunction with the Geysers Recharge alternative.

Refer to Response to Comment 103-3 regarding other river discharge rates.

Response to Comment 220-138

Comment Summary: The comment requests consideration of an alternative pipeline route for the Geysers, avoiding Pine Flat Road.

Refer to Responses to Comments 26-6, 103-5 and 103-13 regarding other pipeline routes.

Response to Comment 220-139

Comment Summary: The comment states that energy prices are over-estimated.

Refer to Response to Comment 11-5 regarding energy costs.

Response to Comment 220-140

Comment Summary: The comment states that there is an error in calculating present-worth value for power costs.

Refer to Response to Comment 11-5 regarding calculations of energy cost over the Project life.

Response to Comment 220-141

Comment Summary: The comment requests consideration of funding options for the Geysers Alternative.

The Draft EIR/EIS has not explored other funding mechanisms for the Project alternatives. The purpose of the EIR/EIS is to evaluate environmental impact of Project alternatives, not to develop project funding. The City of Santa Rosa will do additional work regarding funding at the time of Project selection.

Response to Comment 220-142

Comment Summary: The comment recommends selection of an alternative combining minimal river discharge, irrigation with existing storage, and geysers recharge.

Please refer to Master Response 2, located in Section 6.2 of this document, concerning Project selection.

PUBLIC HEARING COMMENT 221 - MARY ANN DIAZ-ROMERO, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 221-143

Comment Summary: The comment expresses the opinion that the project would not benefit agriculture, but is only intended to dispose of wastewater.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 29-1.

Response to Comment 221-144

Comment Summary: The comment questions the validity of irrigation suitability determinations because all land in the project area was not surveyed.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 29-2.

Response to Comment 221-145

Comment Summary: The comment suggests that the estimated average annual irrigation water use of 23 inches for the West County study area is too high and cites the U.S. Department of Agriculture Soils Survey, which states that water capacity for West County soil is from 4 to 11 inches.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 29-3.

PUBLIC HEARING COMMENT 222 - ERIC KOENIGSHOFER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 222-146

Comment Summary: The comment asserts the need for political debate regarding the project.

No specific comment regarding the Draft EIR/EIS is provided. Responses to specific comments are presented below.

Response to Comment 222-147

Comment Summary: The comment states that zero discharge is the environmentally preferred alternative, and should have been evaluated in the Draft EIR/EIS. The comment also supports agricultural irrigation.

Zero discharge was considered during screening but was not carried forward because the enormous size of storage and irrigation facilities required, and their associated cost. Refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge. The Draft EIR/EIS recognizes the value of irrigation, and this is discussed in Section 4.18, beginning on page 4.18-38.

Response to Comment 222-148

Comment Summary: The comment asks for the cost of zero discharge options in terms of monthly rate increases for wastewater fees.

Although a detailed analysis of rates has not been conducted, monthly rate increases could be on the order of \$45 per month, well exceeding an affordable level. Refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge.

Response to Comment 222-149

Comment Summary: The comment urges protection of the Russian River watershed.

The comment expresses an opinion regarding Project selection. Refer to Master Response 2, located in Section 6.2 of this document.

PUBLIC HEARING COMMENT 223 - MARY BLANCHARD COLETTI, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 223-150

Comment Summary: The comment asks why five dams are proposed on active earthquake faults.

This comment was also submitted in writing. Refer to Response to Comment 65-3. Should a West County Project be selected, only one of the five alternative dam sites will be constructed.

Response to Comment 223-151

Comment Summary: This comment asks whether fish will like to swim at the bottom of the wastewater dam and where water from seepage goes.

The impacts of dam leakage on water quality of streams below the dam were evaluated in Sections 6.1 and 7.1 in Appendix I-16 (Water Quality Impacts Analysis) and in Section 6.5 in Appendix K-4 (Ecological Risk Assessment) of the Draft EIR/EIS. Water seeping from dam enters the creek below the dam and, in theory, ultimately enters the ocean, albeit much diluted. Although there are potential water quality concerns regarding seepage from reservoirs, Mitigation Measure 2.5.3: Control Program for Hydrogen Sulfide, Ammonia, and Dissolved Oxygen, on page 2-125, will reduce these impacts to less than significant, and reservoirs will thus not adversely affect aquatic organisms.

Response to Comment 223-152

Comment Summary: The comment suggests that heavy rains should be considered when designing an erosion control plan.

The Draft EIR/EIS authors concur that heavy rains should be considered in erosion control facilities. Project erosion impacts are discussed starting on page 4.2-22 of the Draft EIR/EIS.

Response to Comment 223-153

Comment Summary: The comment asks how residents affected by dam failure will be able contact emergency services (i.e., fire department) to request assistance when the estimated maximum water levels will be 17 to 80 feet in the inundation areas of Two Rock, Bloomfield, Valley Ford, and Fallon?

A portion of this comment was also submitted in writing. Refer to Response to Comment 65-25. As described in Measure 2.2.14: Dam Safety, on page 2-45 of the Draft EIR/EIS the Project will include development of an evacuation plan, which will be submitted to the Office of Emergency Services. Design measures are in place to ensure dam safety,

and to provide advance warning in the event of a problem. Requirements of the Division of Safety of Dams are described starting on page 4.3-51. Measures to reduce the possibility of dam failure are also described starting on page 4.19-1.

Response to Comment 223-154

Comment Summary: The comment provides an opinion that the mitigation measures proposed by the Draft EIR/EIS are not adequate to deal with the range of conditions (i.e., weather and seismicity) that may occur.

The Draft EIR/EIS has identified those impacts that cannot be mitigated to a less than significant level. There are a number of impacts that cannot be avoided even with mitigation. Because the comment does not address specific mitigation measures, a more specific response is not possible.

**PUBLIC HEARING COMMENT 224 - LEN SWENSON, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 224-155

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

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

Response to Comment 224-156

Comment Summary: The comment asks why "all of the potential legal reuses of reclaimed water" were not considered.

A wide variety of potential reuse options was considered during screening, and the project includes agricultural and urban irrigation components. Some types of reuse were not evaluated further because of logistic or cost constraints. Refer to Response to Comment 56-2 regarding greywater use and underground injection. Refer to Response to Comment 101-8 for a discussion of commercial and industrial reuse.

Response to Comment 224-157

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

All storage sites meeting project criteria were included in the Draft EIR/EIS. Refer to Master Response 14, located in Section 6.2 of this document, regarding use of smaller reservoirs.

Response to Comment 224-158

Comment Summary: The comment asks why there was no study of the beneficial effects of growing high yield cash crops with reclaimed water.

Economic benefits of various crop scenarios are evaluated in Section 4.18 of the Draft EIR/EIS, beginning on page 4.18-38.

Response to Comment 224-159

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

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 56-5.

Response to Comment 224-160

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

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 56-6.

Response to Comment 224-161

Comment Summary: The comment asks why there was no analysis of growth-inducing impacts that will occur with the implementation of each alternative?

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 56-7.

Response to Comment 224-162

Comment Summary: The comment requests that costs for South County projects including groundwater injection be estimated. The comment also requests that costs for South County projects including smaller ponds be estimated. In addition, the comment states that cost projections need to be made for slower population growth to allow a phased in project.

This comment was also submitted in writing. Regarding inclusion of groundwater injection in the costs, refer to Response to Comment 56-8. Regarding costs for smaller ponds, Refer to Master Response 14, located in Section 6.2 of this document. Regarding cost projections for slower population growth, refer to Response to Comment 56-10.

Response to Comment 224-163

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

Refer to Response to Comment 38-8.

Response to Comment 224-164

Comment Summary: The comment states that the South County alternative should be the environmentally preferred 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.

**PUBLIC HEARING COMMENT 225 - LEON BECK, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 225-165

Comment Summary: The comment identifies that the Beck family and Zimmerman family buried Stewart Zimmerman on the morning of September 24, 1996 and that this act has strengthened Leon Beck's resolve to save what good is left in Sonoma County.

Specific concerns were expressed in subsequent comments and each comment is addressed specifically in the Responses to Comments below.

Response to Comment 225-166

Comment Summary: This comment states a desire that the esteros be free of any threat of wastewater changing their freshwater/salt water mix.

Project impacts on salinity in Estero Americano and Estero de San Antonio are addressed in Section 6.1.2 in Appendix I-16 (Water Quality Impact Analysis Report Volume I - Text) of the Draft EIR/EIS. As identified on page 4.6-89 of the Draft EIR/EIS, the West County Alternative will create minor, but unavoidable, changes in salinity of the esteros.

Response to Comment 225-167

Comment Summary: The comment states that attention has been called to the Bloomfield fault which underlies the proposed dam site for the Bloomfield reservoir.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 89-3.

Response to Comment 225-168

Comment Summary: It appears that the comment refers to inadequate studies but provides no specific reason why studies are not sufficient. The comment also indicates that the Draft EIR/EIS states that the potential for dam failure is extremely remote.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 89-4 and 89-5.

Response to Comment 225-169

Comment Summary: The comment concerns the occurrence of stable bedrock at the Two Rock Reservoir site.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 89-5.

Response to Comment 225-170

Comment Summary: The comment states that the Draft EIR/EIS is inadequate regarding the siting of a dam on or near a fault.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 89-4 and 89-5.

Response to Comment 225-171

Comment Summary: The comment states that dams are built with spillways to release overflows and to save the dam.

Spillways are required by the Division of Safety of Dams. The dam is designed with adequate capacity to avoid overflows.

Response to Comment 225-172

Comment Summary: The comment asserts that the evaluation of estero effects and impacts from dam spillway releases is inadequate.

As described on page 4.6-80 of the Draft EIR/EIS, spillway discharges are not expected to occur. If a spill does occur, reclaimed water may impact ammonia, dissolved oxygen, biostimulatory substances, and turbidity in waters below the dam but the impact will be less than significant due to dilution and the timing of overtopping. The impact of the Project on the esteros is the subject of Section 6 in Appendix I-16 (Water Quality Impact Analysis Report Volume I - Text) of the Draft EIR/EIS. The comment does not offer specific information to support the assertion of inadequacy and therefore no further response can be provided.

Response to Comment 225-173

Comment Summary: The comment states that the Friends of the Esteros did not want to sue the City of Santa Rosa on the last EIR (1990), but they won in court because the EIR was not satisfactory and did not have enough detail. The comment states that a lot of money was spent to make the Draft EIR/EIS defensible in court. The comment finishes with the request to refrain from using “comment noted” when responding to comments.

The term “comment noted” is not used in responding to comments for the Draft EIR/EIS. The EIR/EIS authors have responded as completely as possible to all comments about the adequacy of the analyses and information in the Draft EIR/EIS.

Response to Comment 225-174

Comment Summary: The comment refers to comments by others regarding flaws in the Draft EIR/EIS. The comment also states that one of the problems with the Draft EIR/EIS would be the selection of a fault-ridden storage reservoir site.

Specific responses are provided in this document to each comment made in writing or at the public hearing. The commentor also submitted this comment in writing, and it is responded to in Response to Comment 89-3.

Response to Comment 225-175

Comment Summary: The comment states that one of the problems with the Draft EIR/EIS consists of the alternatives that provide spillways for overflow to the esteros; this overflow is considered to be not acceptable.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 89-10, 225-171, and 225-72.

Response to Comment 225-176

Comment Summary: The comment states that one of the problems with the Draft EIR/EIS consists of inadequate response with “comment noted” to individuals who are trying to help.

The term “comment noted” is not used in responding to comments for the Draft EIR/EIS. The EIR/EIS authors have responded as completely as possible to all comments about the adequacy of the analyses and information in the Draft EIR/EIS.

PUBLIC HEARING COMMENT 226 - MARTIN COORPENDER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 226-177

Comment Summary: The comment discusses water reclamation projects in other parts of the country that include river discharge of reclaimed water with apparently positive results. The comment supports river discharge.

Refer to Master Response 2, located in Section 6.2 of this document, concerning Project selection.

PUBLIC HEARING COMMENT 227 - NATASHA PEHRSON, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 227-178

Comment Summary: The comment states that water should be treated as a resource rather than a nuisance and the discharge of treated wastewater to the Russian River will negatively impact the economy of the Russian River area.

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 will 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, analysis concluded that 20% design discharge to the Laguna could be implemented without significant water quality impacts. Potential effects of increased discharge on Russian River on tourism are discussed starting on page 4.18-44 of the Draft EIR/EIS. Also refer to Master Response 7, located in Section 6.2 of this document.

Response to Comment 227-179

Comment Summary: The comment states that the project will affect people with weakened immune systems, and that the prospect of an unhealthy river will create stress on local residents.

Please refer to Response to Comment 85-22 for a discussion of health risks to sensitive populations. The conclusions of Sections 4.6 and 4.7 of the Draft EIR/EIS are that discharge to the river will not pose significant health risks.

Response to Comment 227-180

Comment Summary: The comment indicates a preference for the zero discharge alternative.

Please refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge.

**PUBLIC HEARING COMMENT 228 - KAREN KIBLER, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 228-181

Comment Summary: The comment indicates that the Draft EIR/EIS was not adequately available for review by all members of the public.

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

Response to Comment 228-182

Comment Summary: The comment states that the Draft EIR/EIS was available on a CD, but that many people do not have CD ROM access and that many librarians do not know how to accurately access materials on CD ROM. Lastly, the CD was missing two volumes.

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

Response to Comment 228-183

Comment Summary: The comment addressed the lack of availability of the Draft EIR/EIS at the public locations identified.

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

Response to Comment 228-184

Comment Summary: The comment states that the Draft EIR/EIS was incomprehensible and difficult to follow one alternative all the way through.

Please refer to Master Response 1, located in Section 6.2 of this document, which addresses Document Organization.

Response to Comment 228-185

Comment Summary: The comment asks for additional information regarding unconventional septic systems that may be needed if West County septic systems are affected by seepage from reservoirs.

The City will be responsible for replacement of any affected septic systems. As described in Mitigation Measure 2.5.9: Implement Septic System Monitoring and Replacement Program on page 2-136 of the Draft EIR/EIS, mound systems will be an acceptable alternative.

Response to Comment 228-186

Comment Summary: The comment requests a detailed study of ambient noise in West County.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 106-5 and 106-6.

Response to Comment 228-187

Comment Summary: The comment requests evaluation of noise impacts of pumps, for different times of day and night at all receptor locations.

Table 4.13-19, which starts on page 4.13-42 of the Draft EIR/EIS, shows noise levels at the nearest sensitive receptors. Noise of pumps will be the same 24 hours a day. Further analysis is not necessary because it will not change the conclusion that noise impacts are significant. Refer to Response to Comment 106-6.

Response to Comment 228-188

Comment Summary: The comment states that additional analysis associated with housing that will be lost or rendered unusable should be conducted.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 106-14. .

Response to Comment 228-189

Comment Summary: The comment states the opinion that west county does not want and cannot use the city's reclaimed water.

For a discussion of the potential irrigators and feasibility of the West County alternative, please see Master Response 6, located in Section 6.2 of this document.

PUBLIC HEARING COMMENT 229 - DAVID BANNISTER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 229-190

Comment Summary: The comment urges maximum conservation and questions whether behavioral changes required to ensure reduced wastewater flows are an “unreliable” disposal method. The comment suggests financial incentives and penalties.

Refer to Response to Comment 87-6 concerning the reliability of conservation. While financial incentives could improve wastewater reduction rates, inherent unreliability will remain.

Response to Comment 229-191

Comment Summary: The comment states that hardware-based maximum conservation is not analyzed in the Draft EIR/EIS.

Appendix D-3 (Water Conservation) of the Draft EIR/EIS, shows the amount of water that could be saved with hardware-based conservation for both voluntary and mandatory programs. Mandatory programs assume 100% conversion to conservation appliances. Refer to Table 1A on page 3 of Appendix D-3. This additional level of conservation was analyzed, but has not been included in the Project.

Response to Comment 229-192

Comment Summary: The comment asks what the conservation effect would be if the City approved or paid for greywater systems.

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.

Response to Comment 229-193

Comment Summary: The comment suggests that the cost of extreme conservation measures may seem reasonable if compared to the cost of the alternatives evaluated in the Draft EIR/EIS.

The Maximum Conservation alternative was eliminated from further consideration based on the Project objective of reliability, rather than cost. Refer to Master Response 17, located in Section 6.2 of this document.

Response to Comment 229-194

Comment Summary: The comment requests that maximum conservation be analyzed as a component in the Draft EIR/EIS.

Please refer to Master Response 17, located in Section 6.2 of this document, for a discussion of the reasons maximum conservation was not carried forward as a component.

