

**PUBLIC HEARING COMMENT 243 - ANN DUBAY, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 243-254

Comment Summary: The comment states that the Santa Rosa Chamber of Commerce believes that the Draft EIR/EIS is adequate in scope and urges quick action in the certification of the document.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers.

**PUBLIC HEARING COMMENT 244 - PATTY ROGERS, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 244-255

Comment Summary: The comment states that Sonoma County and the Russian River rely on tourism and that although the Draft EIR/EIS indicates that if people are educated about the discharge, there will not be a problem, there will still be many people who read about dumping in the Russian River and will stay away.

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

Response to Comment 244-256

Comment Summary: The comment states that there are naturally occurring organisms in the Russian River that can cause eye sensitivities, rashes, and intestinal problems, but expresses the opinion that visitors think problems come from the City of Santa Rosa's discharge.

The comment is correct that there are naturally occurring organisms that can cause problems such as "swimmers itch". The Draft EIR/EIS has evaluated swimming in the river as a possible pathway for exposure to reclaimed water, and concludes that there is not a public health risk. Refer to the discussion on page 4.7-61. The Draft EIR/EIS also acknowledges that, while there is not a real risk, there is a public perception problem. Refer to the discussion that starts on page 4.18-44.

Response to Comment 244-257

Comment Summary: The comment states that tourists do not want to go into the Russian River now and will continue not to do so if discharging is done, impacting businesses that cater to tourism.

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

PUBLIC HEARING COMMENT 245 - MAUREEN MIDDLEBROOK, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 245-258

Comment Summary: The comment states that the opportunities for public input have been extraordinary and encourages the certification of the EIR so that the environmentally safe and reliable system can be chosen, taking into account the fiduciary responsibility to the rate payers.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers.

PUBLIC HEARING COMMENT 246 - BRENDA ADELMAN, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 246-259

Comment Summary: The comment states that five minutes to speak about 8,000 pages prevents one from adequately providing comments.

Comments can be made both at the hearing and in writing. Written comments were accepted for almost two weeks after the hearing, until the deadline of 7 October 1997. This provided ample opportunity for comment. This commentor, for example, submitted 542 separate comments (Comment Letter 85, with attachments), extending over 253 pages of written material. The Responses to those Comments extend over 169 pages.

Response to Comment 246-260

Comment Summary: The comment states that the organizational focus on impacts rather than on project descriptions within the Draft EIR/EIS provides a disjointed and difficult format, and it questions the ability of decision makers to provide a basis for decisions because of the convoluted format.

Refer to Master Response 1, located in Section 6.2 of this document regarding document organization.

Response to Comment 246-261

Comment Summary: The comment suggests that most of the information developed in the Draft EIR/EIS was developed by computer and states that "We wonder if the authors of this study have ever even seen the Russian River".

As indicated in Appendix B (List of Preparers) of the Draft EIR/EIS, the preparation of this Draft EIR/EIS involved many people, some collecting data, others conducting research, and many writing sections of the report. Some Draft EIR/EIS authors have been involved in this Project for many years and are well acquainted with the Russian River area. The collection of field data documented in Appendices L-1 through L-7 of the EIR/EIS attests to the numerous visits to the River for scientific purposes. Typically, residents of the area will be very knowledgeable about their environment and many have valuable anecdotal information about the Project area. Efforts were made by the Draft EIR/EIS authors to incorporate information provided by local residents. This comment was also submitted in writing. Refer to Response to Comment 85-469.

Response to Comment 246-262

Comment Summary: The comment states that there are no impact studies on the tourist industry or people's health in the lower Russian River in the Draft EIR/EIS.

Potential impacts to tourism are discussed in the Draft EIR/EIS, starting on page 4.18-44. Refer also to Master Response 7, located in Section 6.2 of this document, regarding impacts to the tourist economy, for additional discussion. Section 4.7 of the Draft EIR/EIS 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” (refer to page 4.7-61).

Response to Comment 246-263

Comment Summary: The comment requests that connections be made between high breast cancer rates, low birth rates, increasing rates of salmonellosis, and higher rates of giardiasis.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 85-471 and 85-472.

Response to Comment 246-264

Comment Summary: The comment states that there is a lack of differentiation in the Draft EIR/EIS of the various risks and impacts between the 5 percent, 10 percent, and 20 percent plans for two different discharge points in most analysis.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 85-481.

Response to Comment 246-265

Comment Summary: The comment states reliance on regulatory standards eliminates discussion of issues outside the regulatory framework and specifically references studies of estrogenic effects.

The specific study referenced in the comment was not undertaken because it was determined that the results will not be conclusive. Similar comments were submitted in writing. Refer to Master Response 9, located in Section 6.2 of this document. Although regulations do not address potential endocrine disrupters, the Draft EIR/EIS provides an extensive discussion of the issues so as to inform the reader about current scientific knowledge and the uncertainties in the scientific community. These issues, as well as the uncertainties, thus will be apparent and before the decisionmakers when they consider certification of the EIR and selection of the Project.

Response to Comment 246-266

Comment Summary: The comment states that a 10 percent alternative means 20 percent; 5 percent means 10 percent.

The terminology “X percent design discharge” (where X is 1, 5, 10, 15 or 20 percent) refers to the maximum monthly average concentration of reclaimed water in the Russian River. There are occasional contingency discharges, which are described in Appendix D-9 (Analysis of Results from Daily and Monthly Water Balance Models) and Appendix D-10 (Water Balance Contingency Plan) of the Draft EIR/EIS. Appendix D-9 provides information about the distribution of monthly average and daily discharge rates over a 70-year period of record. Based on the daily water balance, a 5 percent design discharge Project will not have contingency discharges in excess of 5 percent. A 10 percent discharge will have three months of contingency discharge over the 70-year period of record, with a maximum contingency daily discharge rate of 24.9 percent. Refer to Response to Comment 118-33b for additional data regarding contingency discharges.

Response to Comment 246-267

Comment Summary: The comment states that nutrients and increased wastewater discharges are likely to increase water temperatures. This rise in temperature will in turn promote the colonization of those waters by warm water predator fish species, causing impacts to steelhead and salmon. The comment asks, given the current legal status of steelhead, how will this situation be remedied if you have higher discharges into the river.

Nutrients in increased wastewater discharges will not raise water temperatures. Temperature changes from the discharge itself are not significant, based on Basin Plan criteria. See the discussion on page 65 in Appendix I-16 (Water Quality Impact Analysis Report), of the Draft EIR/EIS.

Response to Comment 246-268

Comment Summary: The comment states that the human health risk assessment fails to take into account synergistic effects of chemicals. The comment refers to a letter written by Dr. Marion Moses.

The commentor also submitted similar comments in writing, and it is responded to in Responses to Comments 85-447, 85-520, and 85-522.

Response to Comment 246-269

Comment Summary: The comment states that only four cryptosporidium samples were collected, cryptosporidium outbreaks occur, and chlorine does not kill cryptosporidium.

The number of reclaimed water quality analyses upon which the human health risk assessment is based is much greater than four for most constituents (including cryptosporidium), as noted in Appendices H-2 (Reclaimed Water Quality) and H-3 (Reclaimed Water Quality Update) of the Draft EIR/EIS. The issue of outbreaks is addressed in Response to Comment 85-223. The comment concerning chlorine being ineffective for cryptosporidium oocysts inactivation is consistent with the understanding

of the EIR/EIS authors. See also Response to Comment 41-10, Responses to Comment letters 10 and 14, and Master Response 8, which is located in Section 6.2 of this document.

Response to Comment 246-270

Comment Summary: This comment states that Santa Rosa's lead levels are bordering on the very high side.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 85-111.

Response to Comment 246-271

Comment Summary: This comment states that silver, cyanide, dissolved silver, and zinc are very high, indicating possible contamination from electroplating, electronics, and photo finishing industries.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 85-119.

Response to Comment 246-272

Comment Summary: This comment states that asbestos is too high and in light of the asbestos-contaminated sewer pipes that were recently illegally disposed of by City contractors, this is a very serious issue.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 85-117.

Response to Comment 246-273

Comment Summary: The comment states that "The phthalates are seen in estrogens and carcinogens that show up in the wastewater in about 20 percent of the samples taken, needs to be monitored much more closely."

It appears that the court reporter has mistakenly written "seen in estrogens" instead of "xenoestrogens". The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 85-113 and 85-505.

Response to Comment 246-274

Comment Summary: The comment states that heptachlor was detected, is a banned carcinogen and should be monitored closely.

Heptachlor monitoring is currently required by the Regional Board, and the Regional Board will establish monitoring requirements for the selected Project. Refer to Response to Comment 85-506.

Response to Comment 246-275

Comment Summary: The comment states that "Rindane showed up almost half of the time, should be much more closely monitored."

It appears that the court reporter has mistakenly written "rindane" instead of "lindane". The commentor also submitted this comment in writing, and it is responded to in Response to Comment 85-507.

Response to Comment 246-276

Comment Summary: The comment says that nitrate concentrations are too high and that nitrate can cause adverse impacts.

The commentor also submitted similar comments in writing, and it is responded to in Response to Comment 85-112.

PUBLIC HEARING COMMENT 247 - LINDA CURRY, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 247-277

Comment Summary: The comment states that the Draft EIR/EIS is convoluted, leaving it to a determined reader to discern to which alternative is being referred to in that particular section of the project.

Refer to Master Response 1, Document Organization, located in Section 6.2 of this document.

Response to Comment 247-278

Comment Summary: The comment states that the Draft EIR/EIS should provide, in plain English, how many people and how many million gallons a day are required for system capacity. Document availability is also an issue.

Table 4.18-1 in Chapter 4.18 of the Draft EIR/EIS identifies the population at buildout of the General Plans of the member entities of the Subregional System. These numbers are the basis for the design of the system. The following numbers are based on General Plan Projections:

Household Population	237,000
Persons per Household	2.45
Occupied Housing Units	97,000
Total Employment	127,000

pages 3.1-6 through 3.1-7 of the Draft EIR/EIS identifies the projected wastewater flows at buildout of the General Plan. At buildout there will be approximately 97,000 dwelling units and non-residential uses with approximately 127,000 employees. As a result, there will be approximately a 21 million gallon per day (mgd) average dry weather flow (ADWF). This will be a 22 percent increase over the 1994 average dry weather flow of 17 mgd.

Refer to Master Response 3, Availability and Cost of the Document, located in Section 6.2 of this document.

Response to Comment 247-279

Comment Summary: The comment states that it was difficult to access the Draft EIR/EIS.

Refer to Master Response 3, located in Section 6.2 of this document, regarding document availability.

Response to Comment 247-280

Comment Summary: The comment states that the Draft EIR/EIS leads the reader to the conclusion that 20 percent discharge is the alternative with the least impact and the least cost.

On pages 5-22 through 5-23 of the Draft EIR/EIS, the environmentally superior alternative was identified as Alternative 5B, the Laguna Discharge Alternative, which causes the least change in the environment when compared with the other alternatives. In addition, other than new pumps at the existing Laguna Plant headworks, no other construction is required because the outfall piping and discharge valves exist and will not be modified, thus restricting construction impacts and cost.

Response to Comment 247-281

Comment Summary: This comment states that “Cost benefit analysis make irrigation alternatives look expensive and undependable when exactly the opposite is true.”

The Draft EIR/EIS presents both costs and potential benefits in terms of increased value of agricultural production in Section 4.18, beginning on page 4.18-38. Cost data are also presented in Section 3.4. Although irrigation alternatives have high construction costs (refer to Table 3.4-1, Cost Estimate by Alternative, on page 3.4-2 of the Draft EIR/EIS), they also have considerable potential agricultural value (refer to Table 4.18-17 on page 4.18-39 of the Draft EIR/EIS). Table 4.18-18 on page 4.18-49 of the Draft EIR/EIS shows Annual Economic Benefits and Costs of Project Alternatives, and concludes that the agricultural irrigation alternatives have a net benefit.

Response to Comment 247-282

Comment Summary: The comment states that tourism is an important contribution to the local economy, based on agricultural assets, local products, open space, and recreation opportunities. The comment also states that it is doubtful that tourists would want to swim in sewage.

Refer to Master Response 7, located in Section 6.2 of this document, regarding impacts to the tourist economy. Section 4.2 of the Draft EIR/EIS concludes that provision of reclaimed water for agricultural uses “would tend to maintain lands in agricultural use that might otherwise be converted to other uses” (page 4.2-28).

Response to Comment 247-283

Comment Summary: The comment states that the Madrone Audubon supports a zero discharge alternative, reclamation alternatives to river discharge, and recognize highly treated wastewater as a resource to be managed.

Refer to Master Response 15, located in Section 6.2 of this document, regarding zero discharge. Project objectives include: “Develop and operate the wastewater treatment

and disposal system in ways that protect public health and safety and promote wise use of water resources” and “Maximize reclamation, recycling and reuse of advanced treated wastewater to the greatest extent feasible.” The comment appears to be in agreement with these objectives.

Response to Comment 247-284

Comment Summary: The comment states that the EIR does not address the real problem that the current system faces, which is a lack of winter storage capacity.

The Draft EIR/EIS has evaluated nine potential reservoir sites and ten reservoir configurations, all of which are options to provide additional winter storage capacity. The sizing of the proposed reservoirs in Alternatives 2 and 3 as presented in Table 3.3-2 in Section 3.3 (page 3.3-21) of the Draft EIR/EIS is designed to provide adequate storage for both the current volume of reclaimed water and the additional volume projected at buildout. As indicated in Table 3.1-6 of the Draft EIR/EIS (pages 3.1-19 and 3.1-20) no additional storage will be required for Alternatives 4 or 5 to adequately handle either current or projected volumes of reclaimed water.

Response to Comment 247-285

Comment Summary: The comment states that the evaluation of cumulative impacts of the project and other wastewater discharges to the River is inadequate.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 94-4.

Response to Comment 247-286

Comment Summary: This comment states that the water quality sample data presented does not state the date or method of analysis used in some cases.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 94-3.

Response to Comment 247-287

Comment Summary: The comment states that the water quality data are presented “so as to leave the reader with the impression that the water quality is acceptable and potential impacts outlined in the surface and groundwater sections are minimized.”

The Draft EIR/EIS presents measured and estimated water quality data and compares them to points of significance. Significant impacts are identified, and impacts that are considered by the evaluation criteria to be less than significant are also identified. The comment is not specific as to what in the Draft EIR/EIS should be modified to address the comment.

Response to Comment 247-288

Comment Summary: The comment states that the Draft EIR/EIS does not address all the viable options and that many of the maps and tables do not contain clear reference points.

The comment does not provide additional or specific information about what these viable options are or which maps and tables the comment considers are not clear. Because no specifics are provided, the EIR/EIS authors are unable to respond more specifically.

Response to Comment 247-289

Comment Summary: The comment states that the time frame of the Draft EIR/EIS is misleading, discounting the years of previous public testimony and other documents that occurred before 1993.

Project background is provided on pages 1-11 through 1-12, where a history of significant events regarding the Subregional System from 1985 through 1993 is discussed. Previous EIRs on similar projects are referenced there.

Response to Comment 247-290

Comment Summary: The comment states that the Draft EIR/EIS needs to look further down the road than 2010 on any project undertaken or it will be obsolete before construction is completed.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 94-6.

Response to Comment 247-291

Comment Summary: The comment states that earlier mentions of a Master Plan for the Russian River system and the Laguna de Santa Rosa should be considered before a decision is made for the preferred alternative.

The Draft EIR/EIS has considered existing and future projects in the analyses of cumulative impacts for sections 4.0 through 4.19. Refer to Appendix D-31 (Cumulative Projects List) of the Draft EIR/EIS for the list of projects used in the cumulative impacts analyses. The master plans for the Russian River system and Laguna de Santa Rosa are not at a stage from which cumulative impacts may be determined and it is likely that the preferred alternative will be selected before the master plans are completed and certified.

Response to Comment 247-292

Comment Summary: The comment states a protest at the cost of the studies and Draft EIR/EIS, and states that the study is obscure, incomplete, and at conflict with sound economic analysis.

The comment states an opinion and because no specific evidence or recommendations have been included in the comment, the EIR/EIS authors are unable to respond more specifically. Specific concerns expressed in the public comments have been addressed in Responses to Comments 247-277 through 247-293, and written comment submitted by the commentor are addressed in Responses to Comments 94-1 through 94-8.

Response to Comment 247-293

Comment Summary: This comment state that the Draft EIR/EIS fails to address other viable and less expensive options such as those advocated by SCOR.

Refer to Master Response 14, located in Section 6.2 of this document, for a discussion of phased projects and small reservoir options suggested by SCOR.

**PUBLIC HEARING COMMENT 248 - DALE WEBSTER, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 248-294

Comment Summary: This comment recommends implementation of Project 7, a citizen proposed project alternative that involves planting and irrigating groves of redwoods.

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

PUBLIC HEARING COMMENT 249 - FLORENCE GRISWOLD, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 249-295

Comment Summary: The comment states that the Draft EIR/EIS was thorough and responded to the requests and demands of the many concerned individuals and groups. It urges acceptance of the Draft EIR/EIS.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers.

**PUBLIC HEARING COMMENT 250 - DALE WRIGHT, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 250-296

Comment Summary: The comment requests consideration of zero discharge to the Russian River.

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

Response to Comment 250-297

Comment Summary: The comment advocates irrigation of redwoods.

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

PUBLIC HEARING COMMENT 251 - MARTIN KERKVLIT, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 251-298

Comment Summary: The comment summarizes the treatment and discharge of wastewater by municipal producers into the Russian River or its tributaries. It states that the City of Santa Rosa has the strictest standards for wastewater in the area. The comment states that the environmental document is adequate and urges the selection of either Alternatives 5A or 5B.

The EIR/EIS authors acknowledge and appreciate the comment's statement that the Draft EIR/EIS provides appropriate CEQA analysis for decision makers. Refer to Master Response 2, located in section 6.2 of this document, regarding Project selection.

**PUBLIC HEARING COMMENT 252 - ERIC AUSTENSEN, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 252-299

Comment Summary: The comment states that the Sonoma County chapter of the Surfrider Foundation is against discharge to the Russian River. The comment brings up public perception and the potential for the public to pollute the Russian River if it is perceived that the City of Santa Rosa is dumping sewage into the river. The comment states that this question of public perception needs to be examined in the Draft EIR/EIS.

Public perception of increased wastewater discharge to the Russian River as it relates to tourism is examined on pages 4.18-44 through 4.18-45. The Draft EIR/EIS authors do not agree with the premise that increased wastewater discharge to the Russian River will promote increased pollution of the river by the public. The River and all waters are protected from pollution by regulations and laws. The City of Santa Rosa is in compliance with such regulations.

Response to Comment 252-300

Comment Summary: The comment states that money saved by using river discharge could be used for a river cleanup program.

Mitigation for Project impacts are included in the Project costs. Refer to Mitigation Measure 2.5.6: Total and Ammonia Nitrogen Source Control Program, on page 2-131 of the Draft EIR/EIS, which specifies that the Subregional System shall work to identify and control non-Subregional System sources of nutrients that contribute to the total nitrogen load in the Laguna. The suggested measure is inappropriate because it does not relate in a demonstrable way to impacts of the discharge. Mitigation that directly addresses the impacts of discharge is included in Section 2 of the Draft EIR/EIS.

Response to Comment 252-301

Comment Summary: The comment states that money saved by using river discharge could be used for environmental education in schools.

Mitigation for Project impacts are included in the Project costs. The City of Santa Rosa Public Works Department has a water quality control education program for high school students. The suggested measure is inappropriate because it does not relate in a demonstrable way to impacts of the discharge. Mitigation that directly addresses the impacts of discharge is included in Section 2 of the Draft EIR/EIS.

Response to Comment 252-302

Comment Summary: The comment states that money saved by using river discharge could be used for investigating nonpoint source pollution.

Mitigation Measure 2.5.6: Total and Ammonia Nitrogen Source Control Program, on page 2-131 of the Draft EIR/EIS, specifically calls for control of non-point sources such as urban stormwater runoff. The suggested measure is inappropriate because it does not relate in a demonstrable way to impacts of the discharge. Mitigation that directly addresses the impacts of discharge is included in Section 2 of the Draft EIR/EIS .

Response to Comment 252-303

Comment Summary: The comment states that money saved by using river discharge could be used for cleanup of leaking septic systems in the City of Santa Rosa and along the River.

Mitigation Measure 2.5.6: Total and Ammonia Nitrogen Source Control Program, on page 2-131 of the Draft EIR/EIS, calls for control of nutrient sources, including septic systems. The County of Sonoma has applied for grant funds from the State Water Resources Control Board under its Small Communities Grant Program to address the septic problem.

Response to Comment 252-304

Comment Summary: The comment states that money saved by using river discharge could be used to monitor construction activities.

Impacts for construction-period water quality impacts of the Project are addressed in Measure 2.2.10: Storm Water Pollution Prevention Plan, on pages 2-40 and 2-41 of the Draft EIR/EIS. This measure specifies that the City will monitor construction activities to ensure compliance with water quality measures specified in the plan.

Response to Comment 252-305

Comment Summary: The comment states that money saved by using river discharge could be used for stenciling programs for storm drains.

Refer to Response to Comment 252-302, which discusses control of urban runoff. While storm-drain stenciling is not specified in Mitigation Measure 2.5.6: Total and Ammonia Nitrogen Source Control Program, on page 2-131 of the Draft EIR/EIS, such measures are already included in the City's program to reduce urban storm water pollutants.

Response to Comment 252-306

Comment Summary: This comment states that money saved by using river discharge could be donated to the Regional Water Quality Control Board.

The City of Santa Rosa currently pays fees to the Regional Board to cover the cost of various permit applications. The suggested measure is inappropriate because it does not relate in a demonstrable way to impacts of the discharge. Mitigation that directly addresses the impacts of discharge is included in Section 2 of the Draft EIR/EIS.

Response to Comment 252-307

Comment Summary: The comment suggests that if a pipeline to the Russian River is constructed for discharge, that people be allowed to connect to the line for irrigation water.

If increased discharge to the Russian River is implemented through a pipeline to the river, discharge will still occur only in the winter months, between October 1 and May 14. Most prospective irrigators will not be able to use reclaimed water during this time of year. The City currently does not have adequate storage to provide additional reclaimed water during the summer months. However, the City will consider proposals from prospective users that could accept reclaimed water during the winter months.

Response to Comment 252-308

Comment Summary: The comment asks that daily water quality test results be reported in the Press Democrat.

The Regional Water Quality Control Board has established an effluent and receiving water monitoring program that must be implemented by the Subregional System for the existing discharge, and is required by water quality regulations to impose a monitoring requirement for the selected Project alternative. Monitoring results are available for public review at the Laguna treatment plant and the Regional Board offices. Effluent quality is monitored daily for turbidity, total suspended solids, coliform bacteria, pH, chlorine residual and ammonia. Except for turbidity and chlorine residual, these constituents are measured in the laboratory and several days are required to determine and validate the results. Thus, reported water quality data will not represent a real-time report of the effluent that is being discharged to the River. Since real-time reporting is not possible for most constituents, the EIR/EIS authors consider daily reporting to be unnecessary and inappropriate.

PUBLIC HEARING COMMENT 253 - STEVE KLAUSNER, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 253-309

Comment Summary: The comments inquires about the reason that habitat restoration of the Laguna was dropped from further consideration.

Wetlands creation was a component of the Community Separator Alternative, which was considered but dropped when it was determined that suitable wetland sites were not available. Criteria for sites included avoiding existing oak woodland and vernal pool habitat. Refer to the discussion in Appendix D-6 (Documentation in Support of Elimination of Alternatives), starting on page 16. Wetlands creation, restoration, and/or protection will, however, be needed to mitigate for any wetlands loss associated with Project impacts.

Response to Comment 253-310

Comment Summary: The comment affirms that the conclusions drawn in the Draft EIR/EIS are fair and reasonable and discharge to the Laguna is safe.

The EIR/EIS authors acknowledge the comment's concurrence with the conclusions of the Draft EIR/EIS and the identification of the environmentally superior alternative. The comment also expresses an opinion and addresses Project selection. Refer to Master Response 2, located in Section 6.2 of this document, concerning Project selection.

**PUBLIC HEARING COMMENT 254 - ANN MAURICE, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 254-311

Comment Summary: The comment raises the issue of coliform concentrations in reclaimed water and whether the City complies with Department of Health Service standards.

Similar and related comments were submitted in writing. The City's system does comply with Department of Health Service standards for reclaimed water. Refer to Response to Comment 113-5.

Response to Comment 254-312

Comment Summary: The comment expresses concern about the quality of reclaimed water in storage ponds.

The commentor also submitted similar comments in writing, and it is responded to in Response to Comment 113-5 and Master Response 8, located in Section 6.2 of this document.

Response to Comment 254-313

Comment Summary: The comment states that the risk assessment was based on four samples.

The number of reclaimed water quality analyses upon which the human health risk assessment is based is many more than four samples for most constituents, as documented in Appendices H-2 (Reclaimed Water Quality) and H-3 (Reclaimed Water Quality Update) of the Draft EIR/EIS. Refer also to Response to Comment 41-10 Master Response 8, located in Section 6.2 of this document, and Responses to Comment Letters 10 and 14.

Response to Comment 254-314

Comment Summary: The comment asks why more pathogen samples were not collected in Delta Pond.

The commentor also submitted similar comments in writing, and it is responded to in Response to Comment 41-2, 41-5, and Master Response 8, located in Section 6.2 of this document.

Response to Comment 254-315

Comment Summary: he comment expresses concern about the quality of reclaimed water in Delta pond, and asks if it is legal to discharge from Delta Pond to the river.

The discharge from Delta pond is permitted by the North Coast Regional Water Quality Control Board, and the reclaimed water meets their requirements for discharge and requirements of the Department of Health Services for unrestricted irrigation. Refer to Response to Comment 113-5 and Master Response 8, located in Section 6.2 of this document.

PUBLIC HEARING COMMENT 255 - KATHLEEN KIRKLAND, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 255-316

Comment Summary: The comment suggests that the Draft EIR/EIS is incomplete because a viable alternative, ocean disposal, was not evaluated in the report.

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).

Response to Comment 255-317

Comment Summary: The comment states that the time to review the EIR and prepare comments was too short.

Refer to Master Response 4, located in Section 6.2 of this document, regarding time for review of the Draft EIR/EIS.

Response to Comment 255-318

Comment Summary: The comment states that there was not adequate access to the Draft EIR/EIS and that the cost of the document was overpriced.

Refer to Master Response 3, located in section 6.2 of this document, regarding availability of the Draft EIR/EIS.

Response to Comment 255-319

Comment Summary: The comment asserts that application of 25 inches of reclaimed water per acre is not feasible in West County.

This comment was also submitted in writing. Refer to Response to Comment 107-3.

Response to Comment 255-320

Comment Summary: The comment discusses limitations of high tech crops and asserts that potatoes rot if excessive water is present.

Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff on page 2-23 of the Draft EIR/EIS, contains measures to prevent over-irrigation, and includes deficit irrigation management in West County. Appropriate management will prevent problems such as root rot. A similar comment was also submitted in writing. Refer to Response to Comment 107-3.

Response to Comment 255-321

Comment Summary: The comment questions the validity of irrigation surveys because all land was not surveyed.

Refer to Response to Comment 29-2 regarding the validity of irrigation surveys.

Response to Comment 255-322

Comment Summary: The comment questions the adequacy of the northwestern pond turtle surveys that occurred in a single day and only documented six individual turtles.

Refer to Responses to Comments 78-7 and 107-5 concerning these surveys.

Response to Comment 255-323

Comment Summary: The comment states that the creek which would be inundated by the proposed reservoir is utilized by a wide variety of wildlife including fox, bobcat, raccoon, opossum, skunk, and deer. Additionally, ducks return each year to nest at the creek.

Terrestrial wildlife impacts associated with storage reservoir construction are discussed on pages 4.8-68 through 4.8-96 and pages 4.9-55 through 4.9-74 of the Draft EIR/EIS. Also refer to Response to Comment 107-5.

Response to Comment 255-324

Comment Summary: The comment states that if a reservoir is built above this site, the downstream flows would be altered, or potentially stopped. If this happens, the ducks that currently use the site for nesting each year, will not be able to nest in the area.

Impacts of storage reservoirs on downstream flows are discussed starting on page 2.9-71 of the Draft EIR/EIS. Reservoirs will reduce flows, and mitigation is proposed to reduce this impact to less than significant.

Response to Comment 255-325

Comment Summary: The comment expresses the opinion that the Draft EIR/EIS is incomplete.

The EIR/EIS authors presume that the opinion that the Draft EIR/EIS is incomplete is in reference to the earlier comment that an ocean outfall alternative was not evaluated. Refer to Response to Comment 255-316.

Response to Comment 255-326

Comment Summary: The comment states that the Draft EIR/EIS is extremely hard to understand.

Refer to Master Response 1, located in section 6.2 of this document, regarding document organization.

Response to Comment 255-327

Comment Summary: The comment states that a lot of assumptions were made in the Draft EIR/EIS.

The EIR/EIS authors agree that assumptions are required to perform environmental analyses. Assumptions have been stated and documented throughout the Draft EIR/EIS and supporting documents. Because no specific evidence or recommendations have been included in the comment, the EIR/EIS authors are unable to respond more specifically.

Response to Comment 255-328

Comment Summary: The comment states that the solutions in the Draft EIR/EIS are inadequate and often unworkable.

It is true that Project alternatives have significant impacts, but the EIR/EIS authors will not agree that this makes them either inadequate or unworkable. Because no specific evidence or recommendations have been included in the comment, the EIR/EIS authors are unable to respond more specifically.

Response to Comment 255-329

Comment Summary: The comment asks who is responsible for assuring that reclaimed water is managed so that it does not end up in creeks adjacent to the storage reservoir and irrigation sites.

Section 2 of the Draft EIR/EIS identifies specific measures (i.e. Measures 2.2.1 through 2.2.6, 2.5.3) that address storage reservoir and irrigation site management. The responsibility for implementing each mitigation measure is specified in the description of each measure.

PUBLIC HEARING COMMENT 256 - HOLLY GUSTAFSON, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 256-330

Comment Summary: The comment states that it was difficult to find subjects within the Draft EIR/EIS and that there was no index.

The California Environmental Quality Act states (CEQA 15122) "An EIR shall contain at least a table of contents or an index to assist readers in finding the analysis of different subjects and issues", The National Environmental Policy Act (NEPA) under 40 CFR Part 1502.10(j) states that the document should contain an index. Table 1-3 in the Draft EIR/EIS (pages 1-28 and 1-29) is an index of key issues that directs you to the proper chapter or section of the document in compliance with NEPA, as approved by the United States Corps of Engineers San Francisco Region. The Draft EIR/EIS also includes an overall table of contents at the beginning of each volume, chapter, and section. In addition the Draft EIR/EIS CD ROM provides a search function which, by entering a key word or phrase, will provide a list of pages that the word or phrase appears. Refer to Master Response 1, located in Section 6.2 of this document, for a further response to document organization.

Response to Comment 256-331

Comment Summary: The comment states that there are listings of references in sections but no footnotes to those references when statements are made, so it is difficult to track anything. The scientific validity of the analyses are called into question.

The Draft EIR/EIS provides a listing of references at the end of each section. The body of the text cites those references using the Name and Year System (Harvard System). This is a common system used in scientific journals. The system cites a reference at the end of a sentence with the author and year of the reference. For example, (Caltrans 1997). If more than one reference by the same author and year is cited the citing is identified with a letter extension. For example, (Caltrans 1997a), (Caltrans 1997b). Foot notes require more text space and will increase the size of the document significantly. The Name and Year system is a valid way of referencing and has no impact on the scientific validity of the EIR/EIS.

Response to Comment 256-332

Comment Summary: The comment states that growth is the biggest issue for Sonoma County and that sewer capacity goes along with growth.

The commentor also submitted this comment in writing, and it is responded to in Responses to Comments 102-3, 102-4, and 102-5.

Response to Comment 256-333

Comment Summary: The comment voices concern that the project will accommodate unlimited growth beyond the year 2010, specifically citing the ability to expand the river discharge and irrigation components.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 102-5.

Response to Comment 256-334

Comment Summary: This comment voices concern about sludge, stating that there are systems that do not create very much sludge, citing such a system in St. Helena as a model, and suggesting that the Draft EIR/EIS has not looked into such a system.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 102-12.

Response to Comment 256-335

Comment Summary: The comment voices concern that selling water and charging for wastewater might result in less encouragement for water conservation, stating that wastewater treatment needs to remain a public service, rather than a money making operation, and that the real resource is the water.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 102-6.

Response to Comment 256-336

Comment Summary: The comment requests consideration of wastewater “purification” beyond tertiary treatment to remove more of the chemicals for the wastewater.

The commentor also submitted this comment in writing, and it is responded to in Response to Comment 102-18.

Response to Comment 256-337

Comment Summary: The comment states that the Draft EIR/EIS does not address the potential impact of irrigation water reaching under the driplines of valley oak trees. The comment further recommends that no water that is dispensed from the wastewater plant should be given to anyone who waters under the driplines of valley oak trees.

No irrigation activity will be allowed within the drip lines of valley oaks. Project Description Measure 2.2.5: Avoid Sensitive Biological Resources (page 2-29 of the Draft EIR/EIS) prohibits any agricultural activity associated with reclaimed water discharge within the drip lines of protected trees (including valley oaks). In addition, an Irrigation

Conservation and Management Program will be prepared for each parcel receiving reclaimed water under Measure 2.2.1, as described on page 2-21, of the Draft EIR/EIS. The Irrigation Conservation and Management Program will include measures which control the application of irrigation water to protect sensitive biological resources (including valley oaks) which are identified during the implementation of Measure 2.2.2: Irrigation Site Resource Maps (page 2-22, of Draft EIR/EIS).

PUBLIC HEARING COMMENT 257 - LYNETTE MCLEAN, (SEPTEMBER 24, 1996), RECEIVED SEPTEMBER 24, 1996

Response to Comment 257-338

Comment Summary: The comment states that only two pages were devoted to the impact on tourism at the Russian River, and finds this to be negligent.

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

Response to Comment 257-339

Comment Summary: The comment expresses concern about cryptosporidium in reclaimed water.

Biological components of reclaimed water, including cryptosporidium, are presented in Table 4.6-2 on page 4.6-9 of the Draft EIR/EIS. No cryptosporidium were detected in four samples of reclaimed water. Additional analysis of cryptosporidium is discussed on page 9 in Appendix H-3 (Reclaimed Water Quality Update). Also refer to Master Response 8, located in Section 6.2 of this document, for additional discussion of cryptosporidium.

Response to Comment 257-340

Comment Summary: The comment states that it would be difficult to convince people that the discharged water to the Russian River is safe no matter the advertising. The comment also states that for spending 12 million dollars, the issues should have been addressed more thoroughly. Additionally, the comment asserts that no one contacted at the resorts has any knowledge of any sort of survey.

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

**PUBLIC HEARING COMMENT 258 - SCOTT WALKER, (SEPTEMBER 24, 1996),
RECEIVED SEPTEMBER 24, 1996**

Response to Comment 258-341

Comment Summary: The comment states that bubbles were observed in the River under existing discharge conditions and more may be present at a 20 percent discharge. The comment also states that “we can deal with the issue of putting [reclaimed water] in the River” only after we can drink reclaimed water.

The impact of the Project on bubbles has been addressed using the Floating Material evaluation criterion that is described on page 4.6-60 of the Draft EIR/EIS, and no significant impacts were identified. The comment does not provide evidence that the observed foam is related to the existing discharge or that more foam may result from a 20 percent discharge. The impact of reclaimed water discharge to the Russian River was evaluated according to numerous criteria in Sections 4.6 and 4.7 of the Draft EIR/EIS that are based on aquatic life and human health impacts. Anecdotally, reclaimed water is occasionally consumed by Utilities Department staff without apparent ill-effects, although the effect of this reclaimed water consumption was not evaluated in the EIR/EIS.

