

## **COMMENT LETTER 97 - DARRELL GALLUP (OCTOBER 3, 1996), RECEIVED OCTOBER 7, 1996**

### **Response to Comment 97-1**

*Comment Summary: The comment states the City of Santa Rosa has thrown away money studying the wastewater issue for many years and that could have been solved cheaply and quickly using market-driven, private industries. City government bureaucracy in addition to the consulting firms that will take money impedes simple technical solutions.*

The comment does not address the adequacy of the analyses or information within the Draft EIR/EIS and, therefore, no further response is possible.

### **Response to Comment 97-2**

*Comment Summary: The comment states that the City of Santa Rosa's tertiary-treated wastewater will meet river discharge standards most of the time but that discharge to the Russian River will never be politically acceptable. In addition, the comment states that it takes only one process upset to cause the discharge of water that does not meet standards, leading to possible lawsuits.*

The EIR/EIS authors agree that the City's reclaimed water can meet discharge standards. The intent of the Long-Term Project is to reduce the chance for discharges that are not allowed within the City's discharge permit. Existing systems within the Laguna Plant, including storage ponds that provide a buffer between treatment and discharge, provide mechanisms to ensure that process upsets can be dealt with without discharge of reclaimed water that does not meet discharge standards. The Draft EIR/EIS has evaluated environmental impacts of discharge to the Russian River, but it is beyond the scope of the environmental document to evaluate political acceptability. 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 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, analysis concluded that 20% design discharge to the Laguna could be implemented without significant water quality impacts.

### **Response to Comment 97-3**

*Comment Summary: The comment urges reconsideration of the Geysers Recharge Alternative, stating that it affords both acceptable technical and political solutions to the problem. The comment also states that with creative funding this alternative does not have to significantly increase costs to the rate payers.*

The Geysers option is still under consideration. Options for financing of each of the alternatives will be evaluated during the Project selection process. Refer to Master Response 2, located in Section 6.2 of this document concerning Project selection.