

COMMENT LETTER 123 - MADELINE SONE AND 13 OTHERS, (OCTOBER 4, 1996), RECEIVED OCTOBER 7, 1996

Response to Comment 123-1

Comment Summary: The comment states that the wastewater problem should be solved through using less water.

The wastewater "problem" cannot be solved entirely by using less water. The Project includes conservation measures, which will reduce the amount of reclaimed water requiring disposal by about 18 percent at buildout (from 26 million gallons per day (mgd) to 21 mgd. Even under the more aggressive conservation scenarios evaluated in Appendix D-3 (Water Conservation Element) of the Draft EIR/EIS, the additional reduction in wastewater generated would be only 1mgd at buildout. The resulting 20 mgd of reclaimed water needing disposal would still require that a Long-Term Project be implemented.

Response to Comment 123-2

Comment Summary: The comment suggest that no project alternative "has some good points" because it would result in growth limitations.

The No Action (No Project) alternative does not achieve the first Project objective, which is "Provide wastewater treatment and disposal for the Santa Rosa Subregional Wastewater System to accommodate projected growth as indicated in the currently adopted General Plan of each of the Subregional entities;" (refer to page 1-3 of the Draft EIR/EIS). The No Action (No Project) alternative is required by both NEPA and CEQA to be included in the Draft EIR/EIS.

Response to Comment 123-3

Comment Summary: The comment opposes Alternative 2A, citing farmland and wetland impacts.

Agricultural impacts described in the comment are in agreement with those shown in Table 4.2-6 on page 4.2-12 of the Draft EIR/EIS. That table shows loss of 158 acres of grazing land, 418 acres of unique farmland, and 38 acres of farmland of local importance. The comment is also correct about loss of wetlands; the acreage figure agrees with that shown on Table 4.10-6 on page 4.10-33. It is correct that Alternative 2A has a number of significant unavoidable impacts. If this alternative were selected, decision makers will have to make a finding of overriding considerations regarding the significant effects. Refer to Master Response 2, located in Section 6.2 of this document, which addresses comments regarding the Project selection process.

Response to Comment 123-4

Comment Summary: The comment opposes the West County Alternative, citing concerns regarding earthquakes.

Refer to Response to Comment 93-6 for a discussion of safety measures for design of dams to withstand earthquakes. It is correct that Alternative 3 has a number of significant unavoidable impacts. If this alternative were selected, decision makers will have to make a finding of overriding considerations regarding the significant effects. Refer to Master Response 2, located in Section 6.2 of this document, which addresses comments regarding the Project selection process.

Response to Comment 123-5

Comment Summary: The comment opposes the Geysers Recharge Alternative.

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

Response to Comment 123-6

Comment Summary: The comment opposes the Russian River Discharge Alternative as unacceptable because of water quality concerns.

The Draft EIR/EIS has evaluated discharge to the Russian River. Section 4.7 concluded that "Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources and would not adversely affect human health via other potential exposure pathways" (see page 4.7-61). Section 4.6 found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (see page 4.6-150). However, with implementation of cumulative projects to reduce nutrient inputs to the Laguna, and with mitigation proposed for Project impacts, analysis concluded that 20% design discharge to the Laguna could be implemented without significant water quality impacts. Refer to Master Response 2, located in Section 6.2 of this document, which addresses comments regarding the Project selection process.