

**COMMENT LETTER 124 - PG&E, KENNETH D. SPEER, (OCTOBER 4, 1996),
RECEIVED OCTOBER 7, 1996**

Response to Comment 124-1

Comment Summary: The comment states that the Pacific Gas and Electric Company has reviewed the Draft EIR/EIS and believes that the city has met its obligation to assess reasonable alternatives and provide a discussion of the significant environmental impacts of the alternatives. However, the comment also suggests that the Draft EIR/EIS makes two inaccurate conclusions and hereby requests that these analyses be clarified.

These issues, which are further described in Comments 124-2 through 124-8, are addressed in the responses to these comments.

Response to Comment 124-2

Comment Summary: The comment states that since cost estimates were prepared at a planning level of detail, presenting a precise cost number rather than an estimated range of costs is inappropriate and misleading.

The costs presented in Section 3.4 and Appendix D-30 (Alternative Projects Construction Cost Estimate) of the Draft EIR/EIS are identified as being at a planning level of detail because they are based upon preliminary engineering rather than final design. However, this involved preliminary sizing of project facilities, and the costs are based upon this information. For example, all pipelines were sized, by segment, and typical construction materials and methods specified. At this level of detail, certain assumptions were made and standard industry unit costs were used, as documented in Appendix D-30.

Because the costs are based upon preliminary engineering with specific sizing of components, the only range which could be considered would be a range of unit costs; however, as described in the previous paragraph standard industry unit costs were used for the cost estimates. As stated in Section 3.4 (page 3.4-1), the cost estimates are intended to provide a relative comparison between alternatives. The EIR/EIS authors believe that the costs presented accurately state the anticipated cost at the level of detail described, and that using a range of unit costs equally applied to all alternatives would not materially change the relative magnitude of costs for the alternatives. Inclusion of a contingency also, in effect provides an assessment of a potential range for costs. Because the Project costs include a contingency, the reader can consider that the cost may range from the basic Project cost without contingency to the full cost with maximum contingency.

Response to Comment 124-3

Comment Summary: The comment states that the Geysers Recharge Alternative was based on zero river discharge while other alternatives included varying percentages of river discharge, resulting in an “apples to oranges” comparison. Capital costs and Annual O&M costs could be approximately half that shown in the Draft EIR/EIS if varying river discharge were to be considered.

Refer to Response to Comment 11-4.

Response to Comment 124-4

Comment Summary: The comment states that despite information given in January, the cost estimates presented in the Draft EIR/EIS are based on invalid electrical costs that inflate the Annual O&M cost of the Geysers alternative and underestimate the costs for other alternatives.

Refer to Response to Comment 11-5.

Response to Comment 124-5

Comment Summary: The comment asks that the degree of uncertainty in the cost estimates be addressed before certifying the Final EIR, and suggests different Capital and Annual O&M costs that would more accurately represent the estimated costs of the Geysers Recharge Alternative.

Refer to Responses to Comments 103-3 and 103-39.

Response to Comment 124-6

Comment Summary: The comment asserts that there is an inconsistency in the Draft EIR/EIS between page 1-39 and Impacts 14.4.5 and 14.4.6 in Table 1-13 on page 1-53 concerning visual impacts of the Geysers facilities.

The statement on page 1-39 that facilities at the Geysers will not result in significant visual impacts refers to facilities located within the Geysers Steamfield, as described in Section 4.14 (page 4.14-98).

To clarify this point, the following change is made to the Draft EIR/EIS:

Page 1-39. Amend the last sentence of the last paragraph as follows:

Facilities at the Geysers [steamfield](#), irrigation, and the discharge outfall at the Russian River will not result in significant visual impacts.

The first paragraph of the discussion of Visual Resources on page 1-39 clearly states that pipelines will have significant visual impacts. Impacts 14.4.5 and 14.4.6 as listed in

Table 1-13 clearly refer to the pipeline component. Impact 14.4.5 is related to the impact of pipeline construction along Pine Flat Road, while Impact 14.4.6 is related to many segments of the Geysers pipeline route from Delta Pond to the Steamfield.

Response to Comment 124-7

Comment Summary: The comment states that while text on page 1-41 of the Draft EIR/EIS states that more energy will be generated than used by the Geysers Recharge Alternative, the energy category of Table 1-13 on page 1-56 fails to reflect this point.

Table 1-13 of the Draft EIR/EIS presents the significant impacts for each of the Project components. Page 4.17-12 of the Draft EIR/EIS indicates that the Geysers Alternative will be a net generator of energy and that the impact is considered beneficial.

Therefore the following changes are made to the Draft EIR/EIS:

Page 1-56. The Energy Section of Table 1-13 is revised as follows:

Table 1-13

Summary of Significant Impacts and Mitigation

Impact	No Action	South County Irrigation				West County Irrigation					Geysers	Discharge		Mitigation Measures
	1	2A	2B	2C	2D	3A	3B	3C	3D	3E	4	5A	5B	
Energy														
17.8.1 The Geysers Steamfield Component may require more energy than providers can deliver. <small>There are no significant impacts.</small>											+			None required.
Socio-economics														
18.1. The Project may increase the service charge for wastewater.		●	●	●	●	●	●	●	●	●	●			No feasible mitigation has been identified.
18.2. The Project may result in loss of homes due to construction of facilities.		●	●			●		●	●	●				No feasible mitigation has been identified.

Note: No mitigation is proposed for the significant impacts of the No Action Alternative.

Level of Significance:

- ⊕ Significant impact before mitigation; less than significant impact after mitigation
- Significant impact before and after mitigation
- + Beneficial impact

Alternatives:

- 1 No Action (No Project)
- 2A Tolay Extended
- 2B Adobe Road/Lakeville Hillside
- 2C Tolay Confined

Alternatives:

- 2D Sears Point/Lakeville Hillside
- 3A Two Rock
- 3B Bloomfield
- 3C Carroll Road
- 3D Valley Ford
- 3E Huntley
- 4 Geysers Recharge
- 5A Discharge to Russian River
- 5B Discharge to the Laguna

Response to Comment 124-8

Comment Summary: The comment asks that Table 1-13 of the Draft EIR/EIS be revised to reflect the inconsistencies identified in Comments 124-6 and 124-7 as well as statements within the text of the document.

Refer to Responses to Comments 124-6 and 124-7, concerning changes to Table 1-13 on page 1-56. The remainder of the request to revise Table 1-13 based on statements in the text of the Draft EIR/EIS found “elsewhere as appropriate” is unclear, and therefore no further response can be provided.

Response to Comment 124-9

Comment Summary: The comment states appreciation to the City of Santa Rosa and expresses eagerness to work with the City and its consultants to develop realistic water flows and costs for the Geysers Recharge Alternative.

The EIR/EIS authors appreciate PG&E’s assistance with this Project.

