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October 4, 1996

CITY OF SANTA ROSAP.O. Box 1678
Santa Rosa, CA 95402**OCT 07 1996**Margle Meredith
City of Santa Rosa
Community Development Department
P.O. Box 1678
Santa Rosa, CA 95402-1678**DEPARTMENT OF
COMMUNITY DEVELOPMENT**

Re: Comments on the Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS

Dear Ms. Meredith:

Calpine Corporation, by virtue of its ownership of Calpine Thermal Power, Inc. has a 25% ownership interest in the Unocal operated portion of The Geysers. We have followed with interest the development of the DEIR. Our specific comments, of course, are mirrored by Unocal, and we refer you to them. However, we wish to emphasize some specific comments in particular:

<u>Comment #</u>	<u>Chapter-Page</u>	<u>Comment</u>	
1	1-21	The limitation of the evaluation for the Geysers Recharge Alternative (GRA) a Russian River discharge of <1 percent on average misrepresents the competitiveness of Alternative 4. The GRA should be evaluated for Russian River discharges of from zero to five percent.	001
2	1-41 & 1-57	It appears that maximum flows used for design flow was used to calculate the power required. Average flows should be used so that the Service Charge is not overstated.	002
3	1-25	Storage tanks and the number of injection wells are sized for 20,000 gpm. Much smaller tanks and ten or less wells would actually be required for a 16,000 gpm design. Further reductions in these numbers should occur with the evaluation of the GRA at higher Russian River discharges, as suggested in comment #1.	003
4	1-41	The DEIR's statement of "No feasible mitigation" for GRA ignores the myriad of funding opportunities from public and private sources which were so effectively utilized for the Southeast Geysers Effluent Pipeline Project. Mitigation is feasible and should be included in the socio-economic evaluation.	004

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5	1-59	The definition of the "Environmentally Superior Alternative" is dependent upon the environment being considered. The DEIR does not give sufficient weight to consideration of the impact of the Laguna Discharge Alternative, the supposedly environmentally superior option, on the Russian River itself. If a properly-weighted value assessment of the impact to the river was performed, how could the Geysers Recharge Alternative not be the <u>least significant?</u>	005
6	Figure 3.1-7	The routing of the Geysers Recharge transport pipeline excessively inflates construction costs. A design with a more direct right-of-way should be considered. This should significantly lower costs and avoid unnecessary mitigation requirements for unstable slopes along <u>Pine Flat Road.</u>	006
7	None	The cost of electrical power for the GRA <u>is overstated.</u>	007
8	None	The EIR, in its evaluation of the socio-economic impacts of the GRA, does not take into account the benefits in jobs or property tax base to the additional energy that the GRA would allow The Geysers to produce during the full life of the <u>project.</u>	008
In summary, it appears that the DEIR has been so constrained and focused in its preparation as to misrepresent the real costs and benefits of the GRA. The DEIR also underweights the impact of the various options on the Russian River ecosystem, which heavily weights the conclusion of the study in favor of Alternative 5B, the Laguna Discharge Alternative. A more accurate and realistic design and estimate of the costs of the GRA is necessary before the DEIR should be accepted.			009
Calpine feels strongly that with consideration of the comments above and the resulting changes in the calculation of environmental impact that the GRA might well be the Environmentally Superior Alternative.			010

Respectfully,

Jacob M. Rudisill

J. M. Rudisill
Manager, Geysers Operations

cc: L. A. Kerby
L. R. Krumland
R. A. Walter