

Pacific Gas and Electric Company

Geysers Power Plant  
P.O. Box 456  
Healdsburg, CA 95448  
707/431-6000

October 4, 1996

CITY OF SANTA ROSA  
P.O. Box 1678  
Santa Rosa, CA 95402

OCT 07 1996

DEPARTMENT OF  
COMMUNITY DEVELOPMENTMarie Meredith  
City of Santa Rosa  
Community Development Department  
P.O. Box 1678  
Santa Rosa, Ca 95402-1678

Dear Ms. Meredith:

Pacific Gas and Electric Company has reviewed the City of Santa Rosa Subregional Long-Term Wastewater Project Draft Environmental Impact Report/Environmental Impact Study. While PG&E believes that the City has met its obligation to assess reasonable alternatives and to provide a discussion of the significant environmental impacts of those alternatives, we feel that in two important areas the Draft provides inaccurate conclusions and hereby request that those be clarified before the EIR/EIS is certified. 001

#### #1 - Cost Estimates Summary 002

We understand that the cost estimates for the alternatives were prepared "at a planning level of detail" and so we believe that presenting a precise cost number, rather than an estimated range of costs, is inappropriate and misleading.

In the case of The Geysers alternative, it is our understanding that the estimated costs are based on zero river discharge while the other alternatives include varying percentages of river discharge. This results in an 'apples to oranges' comparison. If The Geysers alternative or a variation of The Geysers alternative (as was done to produce Alternatives 5A and 5B) were calculated based on a minimal amount of river discharge the Capital Cost and Annual Operation & Maintenance Cost would be approximately half that which is shown in Table 1-2. 003

This means that Alternative 4 might cost only 30%, rather than 300%, more to construct than Alternative 5A!

We also note that in spite of our working on an expedited basis with the City's consultant in January that the cost estimates presented in the July EIR/EIS are based on invalid electrical costs which inflate the Annual Operation & Maintenance Cost of The Geysers alternative and underestimate the costs for the other alternatives.] 004

We ask that the City address the degree of uncertainty in its Cost Estimates before certifying the EIR/EIS. We believe that a range of Capital Cost for "4 Geyser (sic), Recharge" of \$85,000-\$208,300 and Annual Operation & Maintenance Cost of \$2,800-\$5,200 in Table 1-2 would more accurately represent the estimated costs of this alternative.] 005

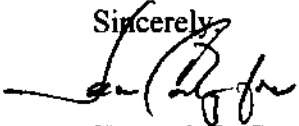
#2 - Inconsistencies between Text and Tables 006

While it states in the last paragraph on page 1-39 that "Facilities at the Geysers....will not result in significant visual impacts" Table 1-13 on page 1-53, items 14.4.5 and 14.4.6 show significant impacts associated with The Geysers alternative. Similarly, and significantly in the case of The Geysers alternative, while the text on page 1-41 states that "The Geysers project will generate more energy than will be used for pumping", the Energy category of Table 1-13 on page 1-56 fails to reflect this important point] 007

For both cases, and elsewhere as appropriate, we ask that the City revise Table 1-13 to reflect the statements in the text of the Draft EIR/EIS.] 008

PG&E appreciates the time and efforts that the City, especially Messers. Ed Brauner and Dan Carlson, has put forth to prepare the Draft EIR/EIS, and especially in discussing The Geysers alternative with representatives of PG&E and the geothermal community. PG&E remains eager to work with the City and its consultants to develop realistic water flows and costs for a pipeline that will economically provide reclaimed water to The Geysers as a reliable disposal method for the City of Santa Rosa.] 009

Sincerely,



Kenneth D. Speer  
Plant Manager

LDC:bms