

TABLE 2: SCOPING LETTERS/PHONE CALLS

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27	A	Kathy Kenny Baskin, Santa Rosa (L)	Support a wastewater system that meets public health objectives and is safe for the environment; the option chosen <u>must</u> be <u>affordable</u> .	TASKs 33 and 39	TASKs 33 and 39		See response to 26 B.
28	A	Ernestine I. Smith, Santa Rosa (L)	The City of Santa Rosa should not study ocean outfall as a long-term project alternative.			X	Ocean outfall was dropped from consideration by the Board of Public Utilities during the alternatives selection process because it did not meet System objectives.
29	A	Edward Ueber, Gulf of Farrallones National Marine Sanctuary, (L) (See also No. 44)	Problem with 1% to 20% Russian River discharge being an option in itself and part of other options. How can we determine which parts of option will be needed, if the percentage (of discharge) in and of itself can fulfill project needs? Clarify discharge percentage first, then develop options on remaining need.	X	X		The alternatives are described consistent with NOAA's request that discharge percentages need to be identified.
29	A1		Dismayed that indirect discharges to marine and estuarine environments are included, but direct discharge proposed previously for ocean outfall is not. Why is this?			X	See response to 28 A.
29	B		How much water will get into Estero Americano and Estero do San Antonio (runoff percolation seepage and direct discharge)?		TASKs 18 & 21		The scope has been revised to include a discussion of possible irrigation contributions. Reservoir leakage will be estimated and any discharge to streams and into the Estero will be evaluated per response to comment 2 J.

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29	C	Edward Ueber, Cont'd.	What is in the water including pesticides, metals, nutrients?		TASKs 18 & 21		The scope has been revised to: identify constituents in the wastewater and evaluate potential effects of project on agriculture and agriculture's effects on water quality.
29	D		When (what time of year) will (the wastewater) get into the Esteros?		TASKs 18 & 21		The stream flows resulting from the project will be evaluated.
29	E		What is the maximum, minimum, mean (and) mode of water flow in wet, dry, extremely wet and drought years?		TASKs 21 & 38		Monthly flows for all the flow extremes cited are available from previous studies. There is no indication that daily flows are required for the aquatic analysis at this time.
29	F		Why is the same water use rate, 0.67 million gallons/acre annually, used for agriculture in Rohnert Park, a very hot dry area, and also for Stemple Creek (West County), a very foggy cool area?	TASK 18	TASK 18		Different water use rates are being developed.
29	G		Please include page 8: b, Environmental Requirements: The Marine Protection, Resource and Sanctuaries Act."	TASK 1			Page 8, "The Marine Protection, Resource and Sanctuaries Act" is a resource being used.
29	H		Please include the names, acreage and crops farmers are going to grow in the Stemple Creek/Estero de San Antonio Watershed and Americano Creek/Estero Watershed.		TASK 18		Typical cropping scenarios will be evaluated in various locations. Specific names will not be used.
30	A	James Vantine, Santa Rosa , (L)	Using (waste)water for recharge in the Geysers Reservoir is cost-effective and an environmentally acceptable solution.	X			Geysers Recharge will be evaluated in the EIR/EIS.

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30	B	James Vantine, Cont'd.	Please correct: Alt. 5 called "Geysers Recharge" in early chapters, but then called "Geysers Discharge" later in Scoping Report.		X		Geysers discharge has been corrected to Geysers Recharge.
30	C		Discussion of energy for Geysers Recharge is extremely important, but essentially ignored. Yet in Appendix A, and p. 7 of Corps of Engineers' letter, energy is listed as a significant issue.		X		The geysers alternative would be a significant user of electrical energy, even though it is expected that pumping would be scheduled for off-peak hours to reduce the peak demand and the cost of operations. The project would also produce significant electrical energy from the steam produced by the water delivered to the steam fields. The quantity of energy consumed by the project versus the energy produced will be identified.
30	D		There is no mention of the amount of energy needed to pump water to the Geysers Geothermal field. 1986 Bechtel Report provides comprehensive economic analysis of conveying Santa Rosa wastewater to the Geysers. Wastewater could be pumped at night, when excess and cheap power is available, (thus) reducing pumping costs significantly.	TASK 31	TASK 31		The Screening Report did identify the operations and maintenance costs of the Geysers alternative, and most of this cost is for pumping the water up the 3,000-foot lift to the Geysers. These energy consumption and cost calculations will be refined in more detail.

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30	E	James Vantine, Cont'd.	Potential economic benefits of increasing or sustaining electrical energy production by injecting wastewater into the Geysers are ignored.	TASK 33	TASK 33		The Screening Report did not address the benefit in the value of the electrical energy to be produced by the water delivered to the Geysers. The report only addressed the costs of the construction, operation, and maintenance of the project. The EIR will address the benefits as well as the costs.
30	F		18 mgd of treated wastewater is about half the Geysers' estimated deficit of 40,000 AC.-Ft./year.	NA	NA	NA	Comment noted.
30	G		Value of 18 mgd heated to steam needs to be addressed.	TASK 33	TASK 33		In scope.
30	H		EIR/EIS should address the environmental benefit of not having to develop additional sources of electrical power using coal, natural gas, or other fuels.	TASK 33	TASK 33		One potential benefit of the Geysers alternative is the avoided cost for not having to develop an equivalent quantity of electrical power from other sources. The subject of avoided costs will be considered so as to be treated equally for all alternatives.

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30	I	James Vantine, Cont'd.	Mention possible ways to increase the economic benefit of pumping wastewater up 3,000 feet. For example, using two surface reservoirs, water could be pumped up at low off-peak rates, then the head used to generate peaking power when demand and electrical rates are high.			X	Pumped storage does not produce a net revenue flow because PG&E pays less for purchased power than it charges for sold power. The proposed concept would also add cost to the project to develop the suggested reservoir atop the hill. In addition, to fill a reservoir atop the hill for later release to generate power would require delivering less of the flow to the steam fields. This would make the project less economically attractive to the Geysers Operators, which might reduce their financial participation, which is considered essential to make this project economically viable. Therefore, the proposal would trade some revenue from sold power for some financial participation from the Geysers Operators, while complicating the construction and operation of the project. A detailed economic analysis of the proposal is currently out of scope.
30	J		Analyze the effect of Geysers recharge on Sonoma Co. tax base. Geysers geothermal field paid about 20% of County taxes in early '80s. Geysers recharge will help sustain the County's tax base.			X	This is an indirect benefit that will not be addressed in the scope of work.
30	K		Employment effects should also be addressed; recharge could sustain current levels of employment	TASK 33			In scope.

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30	L	James Vantine, Cont'd.	Statement made that Geysers Recharge would reduce or eliminate the need for diversion of flows from Big Sulphur Creek. Chances are (using reclaimed water for Geysers Recharge) would not reduce or eliminate the need (for diversions).	NA	NA	NA	Commenter is correct.
31	A	Wayne Hubbard, State Water Resources Control Board (L)	Santa Rosa approved for loan from State Revolving Fund (SRF) for treatment plant expansion and water reclamation. If Santa Rosa wants additional funds, SWRCB will have to review EIR/EIS. Other agencies required to review EIR/EIS for SRF funds: U.S. Environmental Protection Agency, Air Toxics Division; U.S. Army Corps of Engineers; Federal Emergency Management Agency; U.S. Fish and Wildlife Service; U.S. Soil Conservation Service; San Francisco Bay Conservation and Development Commission. Also send information regarding compliance with Section 106 of National Historic Preservation Act.	NA	NA	NA	Comments noted.

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31	B	Wayne Hubbard, (L) Cont'd.	Inconsistencies in project descriptions: Alt. 5 (Geysers Rescharge) and Alt. 6 (20% Russian River Discharges); do not include storage, yet the checklist refers to impacts associated with reservoir construction for these alternatives.	NA	NA	NA	Commenter is correct. The checklist should not have included an item for reservoir construction.
31	C		Draft EIR/EIS should include results from the biological assessment and all studies/analyses proposed in the Initial Study.	TASK 19	TASK 19		Biological assessment (BA) is currently scheduled to circulate with the Final EIS after a preferred project is declared. The BA is considered part of the permitting process and has not been scoped.
31	D		EIR/EIS should provide a comparative environmental evaluation of the alternatives in a summary table.	TASK 39			In scope.
31	E		Address impacts of a significant increase in wastewater flow for the planning period. State Rejvolving Final projects required to meet Federal General Conformity Rule for the Federal Clean Air Act. Conformity determination can be made if the project is sized to meet the needs of population projected in applicable State Implementation Plan (SIP) for air quality. Please provide capacity, population and air quality information required.	TASK 39			No change of scope needed. Conformity with the Clean Air Act is a part of the present scope.

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31	F	Wayne Hubbard, (L) Cont'd.	Flood plain and wetland delineation should be shown in EIR/EIS.		TASK 38	X	A floodplain delineation is not necessary because none of the alternatives as proposed will increase peak flood flows or contribute to any increased flood hazard. A dam break analysis will identify the limits of inundation resulting from any potential dam break. Wetlands will be identified.
31	G		Agriculture conversion analysis should be prepared in coordination with U.S. Soil Conservation Service.	TASK 18	TASK 18		Prior conversion of wetlands to agricultural lands will be documented during the wetlands determinations. The Soil Conservation Service is now the Natural Resources Conservation Service.
31	H		Dewatering impact should be discussed in EIR/EIS.	TASK 18	TASK 18		See 2 I. Any adverse effects on the environment arising from any dewatering required for the construction of pipeline trenches and storage reservoir dams will be managed by imposing construction specifications on contractors such that appropriate containment of fluids, chemical analyses (if needed), clarification, and disposal of fluids will be incorporated to limit any impacts. Any potential impacts and their mitigation will be discussed in the EIR/EIS.
31	I		City may need to file a petition to change point of discharge with the SWRCB, Division of Water Rights.			X	This comment relates to project permitting. An evaluation of the water rights implications of each project alternative may be needed. However, this scope of work goes through the preparation of the environmental documentation and not project permitting.

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32	A	Mark Feldman, Sebastopol, (L)	Do not want study of wastewater to the ocean.		X		Ocean Outfall has been eliminated as a potential project alternative.
32	B		Don't spend any more money on this study; fed up with misuse of our money.	NA	NA	NA	Before selecting a project to implement, the City of Santa Rosa must analyze several alternatives thoroughly and at an equal level of detail so that decision makers can consider the possible impacts of all of them before selecting one.
33	A	Hamilton Hess, Friends of Cobb Mountain, (L)	Residents of Cobb Region in Lake County concerned about seismic effects of Lacosan Project; feel neither industry nor the County willing to acknowledge responsibility for earthquake damage. (Provided copy of his comments on Lacosan's Draft EIR/EIS).	TASK 35	TASK 35		Induced seismicity study and review of Lacosan EIR are in scope.
34	A	Geoffrey Johnson, Santa Rosa (L)	Principal issue is future population growth to be served by Subregional System. Therefore, because the current system does not reliably dispose of flows under all weather conditions, the City is in technical violation of its own General Plan. General Plan EIR is worthless. Fundamental issue is growth.	TASK 33	TASK 33		Review of population growth projections is in scope. See response to comment 20, Table 1.

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34	B	Geoffrey Johnson, (L) Cont'd	Proposes "limited growth option" which would freeze growth at levels occurring during preparation of the EIR/EIS. This option would be applicable to all the alternatives under consideration, and consider wastewater disposal for a population far less than that of the Subregional Partners' buildout.			X	A "limited growth option" is not one of the alternatives being analyzed, because growth management is within the exclusive authority of each jurisdiction in the Subregional System. Confirmation has been received from these jurisdictions about potential growth in their areas. Based on the information received, a limited growth option will not be studied. The Subregional System is responsible for responding to the demand for wastewater services created by the populations of its member jurisdictions, but has no authority to limit or promote population growth in these communities.
35	A	Martin Strain (L) Tomaes (See also communication #21)	What will be impacts on Esteros, Bodega Bay and Tomaes Bay of nutrient loadings from direct and indirect discharges over a 10-, 25-, and 50-year span? Impacts on toxic algal and dinoflagellate species; economic impact of fish kills and shell fish closures due to this pollution?	TASKs 18, 20, 21	TASKs 18, 20, 21		An evaluation of the quantity of wastewater and effects in the Estero will be conducted first per response 2 J. The results of this study will provide the basis for determining if any significant potential exists for effects in Tomaes Bay.
35	B		Discuss financial remuneration and mitigation measures to compensate fishing, shell fishing and tourist industries for any losses.			X	This comment is not addressed in scope because the impact on the Esteros is being determined and would be mitigated to a less than significant level.

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35	C	Martin Strain, (L) Cont'd.	How will Subregional System remove all chemical compounds from wastewater downstream from industrial pretreatment processes? How will System address over 100,000 chemical compounds in waste stream? Determine economic impacts to fishing and shell fishing industries of long-term exposure to chemical residues in waste stream.	TASK 21		X	This is an evaluation of disposal alternatives, not treatment. This project will not identify how it will remove all chemical compounds. Characterization of effluent quality is in scope.
35	D		Estimate morbidity and mortality of residents in Russian River area and Two Rock Valley from drinking treated wastewater exclusively (100%) and diluted (20%; 5%) with local water.	TASK 32		X	A quantitative analysis of the human health impacts from exposure to 100% reclaimed water and the Russian River as drinking water sources is not within the scope of work. A qualitative analysis of other potential exposure pathways is included.
35	E		Estimate the morbidity and mortality of flora and fauna in the Esteros from contact with any residual chemical compounds.	TASKs 18, 19, 21	TASKs 18, 19, 21		Estero studies will be conducted per response 2 J. The scope has been revised to study hydrology and water quality impacts to Estero. Toxicity issues associated with biota of estuary will be reviewed. Review of current biotic resources in Estuary is in scope.
35	F		Estimate length of time after start of direct or indirect discharge that 1%, 5%, 25% and 50% of each animal species in the Esteros begins to exhibit cancerous lesions, deformities and lowered reproductive rates.	TASKs 19, 21	TASKs 19, 21		Toxic effects of effluent discharge are being evaluated.

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36	A	Leigh Jordan, Historical Resources Information System, Sonoma State U., Rohnert Park, (L)	No additional comment.	NA	NA	NA	No response required at this time.
37	A-G	Paul Ogasawara, Sebastopol, (L)	City could be advocating a 20% limit (on effluent flows into Russian River) without any comprehensive studies on the biological impacts. Why limit alternatives to only six, all of which have flaws?	X	X	X	Studies on effluent impacts are in scope. The options selected for study provide a reasonable range of alternatives and have shown the most promise after surviving screening.
37	H		Suggest an "Enhanced Treatment" Alternative, that would pasteurize tertiary treated sewage effluent. Energy provided by biomass cogeneration, which would reduce cost.			X	This is a comment about treatment technology, and the EIR/EIS is only evaluating disposal and reuse.

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37	I	Paul Ogasawara, (L) Cont'd.	Use treated water for landscape irrigation; eliminate need for dams and phase out ag. irrigation. Massive and comprehensive retrofitting needed; require double piping in all new development.	X	X	X	Enhanced treatment of the wastewater and using it for urban landscape irrigation via a dual pipeline system is currently being implemented on a limited scale in an incremental manner. The City is currently extending their reuse distribution system to deliver effluent to parks and golf courses and other urban landscape areas in the Rohnert Park area. Further extension of the urban irrigation system into the Bennett Valley and the Fountain Grove area will be studied as a component of the project. The concept of installing a dual distribution system to residential areas for landscape irrigation is currently not in the scope of work.
37	J		Solve sewage-into-drinking-water problem by creating a new water district which uses Lake Sonoma as its source. Make a deal with Marin Co. to provide a long-term water source.			X	This alternative was considered and not selected during the alternatives evaluation phase of this project.
37	K		Remove all (current) members of the (Regional) Water Board, because they have lowered standards, so that Santa Rosa is not breaking the law.	NA	NA	NA	Comment noted.

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38	A	Monica Maguire, Santa Rosa (L)	Comment on West Co. Reclamation Alternative: What is the impact on the Tresch and Stein families and their quality of life, livelihood, spiritual and emotional well-being from this project? Emotional turmoil City has put our West Co. neighbors through is a crime. You would force the Walker Road families to look at an ugly dam and wonder if their drinking water has chemicals in it, from wastewater percolating into it.	TASK 32 TASK 37		X	Aesthetic impacts on local residents and potential impacts on their drinking water are addressed in the scope of work. There has been no decision about which alternative will be selected and implemented. The EIR/EIS must analyze the alternatives and components, to provide information to the BPU, so that it can select a project. Potential impacts to neighbors of all the projects and how to mitigate them will be part of the EIR/EIS information.
38	B		Santa Rosa is growing too fast. What happened to building moratorium?			X	This project will not evaluate building moratoriums
38	C		Disgusting when driving down Dutton Ave. ramp. There is need of a traffic light.	NA	NA	NA	This EIR/EIS is not intended to address existing traffic problems.
39	A	Allen Marcucci, Petaluma (L)	The U.S. Army Corps of Engineers wants Santa Rosa to add an Ocean Outfall Alternative. This Alternative could lead to uncontrolled growth and eliminate the resource of wastewater reuse.			X	After scoping and consultation with the U.S. Army Corps of Engineers, the BPU reconfirmed its decision not to include an Ocean Outfall Alternative.
39	B		If there is an Ocean Outfall Alt., combine it with limited irrigation.			X	Ocean outfall is no longer an alternative to be studied.

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40	A	Thomas Yarish, Mill Valley (L), Friends of the Esteros	Analyze the cost to ratepayers of a minimal project designed only to accommodate the existing level of demand, factoring in aggressive implementation of wastewater recycling and reuse. These costs should be identified as deferred costs of the building boom of the '70's and '80s.			X	Not in scope. A No-Growth Alternative was suggested and dropped from consideration during the scoping process because the various jurisdictions within the Subregional System, when consulted, requested that their existing general plan buildout projections be used as the basis for determining future wastewater volume analyzed in the EIR/EIS. See also response to comment 83 E.
40	B		Analyze cost to ratepayers of a limited growth scenario with substantially reduced urban growth and all growth impacts identified as either degrading or enhancing the quality of life.			X	The EIR/EIS, in evaluating the No-Project Option, will be considering a scenario with no new facilities. Population growth and ratepayer costs will be analyzed as potential impacts of the No-Project Option. The EIR/EIS will not analyze the potential effects from the population which could result from the No-Project Alternative. The Subregional System does not have authority over its member communities' general plan population growth projections. See also the responses to 40 A and C.
40	C		Identify and analyze the cumulative impacts of a fully implemented project on both rate increases and substantial "quality of life" impacts. Correlation between population growth and real economic growth? Identify real beneficiaries of urban buildout. Essentially, EIR needs to justify the projected urban buildout for Subregional partners.	TASK 33	TASK 33	X	The EIR/EIS will evaluate the cumulative impacts for the fully implemented project in terms of cost to the ratepayer. The quality of life and economic development issues which could result from General Plan buildout have already been addressed in the Subregional partners' respective General Plan EIRs.

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40	C1	Thomas Yarish, (L) Cont'd.	The EIR needs to demonstrate that the existing demand on the wastewater system has not already met or exceeded available resources for fresh drinking water and for safe wastewater disposal. How will wastewater disposal and greater demands for fresh water factor into the cumulative effects of municipal and rural users on the Russian River, for example?	TASKs 28, 38	TASKs 28, 31, 38 and 39		The EIR/EIS will evaluate the impacts on the drinking water supply and water quality of the Russian River.
40	D		Study the hydrology of surface watersheds and subsurface aquifers of West County. Address local groundwater quality impacts from wastewater and secondary pollution from the county landfill. Carefully delineate faults and fractures in the watershed. Perform a risk assessment to analyze the potential for earthquake-induced changes in geologic structures that may introduce pollutants into West County aquifers.	TASK 30	TASK 30	X	A reservoir-induced earthquake risk assessment is not part of the scope. Potential hydraulic connections between reservoirs will be studied.
40	E		A geologist suggested that hydrostatic pressure from water stored at Button Ranch could force water into nearby landfill. What is the actual risk, before and after an earthquake?	TASK 30	TASK 30	X	Analysis of potential effects of reservoir on nearby landfill is in scope. See response to comment 40 D regarding earthquake risk.

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40	F	Thomas Yarish, (L) Cont'd.	Identify all potential sources of pollution for all project alternative sites, particularly those sources potentially affecting human health.	TASK 32			A quantitative analysis of the human health impacts from exposure to 100% reclaimed water and the Russian River as drinking water sources is within the scope of work. A qualitative analysis of other potential exposure pathways is also included.
40	G		Given current market conditions, there is no guarantee that West County, irrigation-based agriculture will be viable in the long term. Questionable West County crop productivity makes long-term irrigation management scenarios very uncertain. Unclear how Subregional System will manage irrigation systems in perpetuity given the failure rate of small farms and in the absence of ranchers currently willing to host a storage reservoir.		TASK 33		In scope. It is concurred that there are no guarantees associated with any of the alternatives.
40	H		Identify mechanisms by which Subregional system may safely and reliably manage proposed West County irrigation and storage systems indefinitely. Identify long-term economic factors affecting both ratepayers and farmers who irrigate under contract. How might a West County farmer elect to discontinue irrigation? How might long-term irrigation affect productivity of West County soils?	TASKs 18 and 33	TASKs 18 and 33		Development of an irrigation management plan is in scope. Impacts on soils will be evaluated. Terms of contracts with farmers would be negotiated after project selection.

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40	1	Thomas Yarish, (L) Cont'd.	<p>Friends of the Esteros believe that a wastewater disposal project in West County is neither economically nor environmentally defensible. Strongly recommend project alternatives that:</p> <ol style="list-style-type: none"> 1) Keep wastewater within service area's watersheds; 2) Implement highest possible conservation reclamation and reuse within watershed of origin; 3) Observe the natural carrying capacity of watersheds and wildlife habitats; 4) Provide fail-safe, long-term management practices; 5) Foster a high degree of regional coordination of water and natural resource protections. 	TASK 29	TASK 29		The overall scope for the water conservation element includes a description of current conservation programs and the estimated reduction achieved at the full implementation level (e.g., toilet, showerhead, faucet aerator replacement), what could be done in addition to these existing programs by employing proven technology (e.g., programs consistent with Best Management Practices - published by California Urban Water Conservation Council), and what can be done by considering new technologies (e.g., waterless urinals, replacing inefficient appliances, etc.). Cost-effectiveness evaluations will be conducted for each measure of conservation, as well as the amount of wastewater saved. The alternatives will be evaluated on their potential effects on watersheds, habitats, biological resources and human health.

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40	J	Thomas Yarish (L), Cont'd.	Friends of the Esteros incorporates by reference all prior commentary, administrative records, testimony, petitions, studies and correspondence on the Subregional Project from 1989 to the present, specifically with reference to the CEQA action, "Friends of the Esteros et al. V. the City of Santa Rosa." We would like once again to enter into the record the study prepared by NOAA on the nutrient loading of the West County watersheds and coastal estuaries.	X		X	Friends of the Esteros (FOE) was contacted and asked to make specific reference to the previous comments and information which it felt should be incorporated in the scope. Except for the foregoing comments, FOE declined to further identify this information. The NOAA nutrient loading study was reviewed as part of the baseline data for the EIR/EIS and will be utilized as a data source in the EIR/EIS.
41	A	Jean Starkweather, Marin Conservation League, San Rafael (L)	What constituents are tested in wastewater before discharge? How often are these tested in a year, and what constituents failed to meet water quality standards in the last five years? Did tests include bioassays? If so, what animals were used?	TASK 21	TASK 21	X	Effluent quality data are being assembled in Task 21, and these data will reflect the list of substances being analyzed. Preparation of a detailed summary of the City's monitoring program is being prepared as part of the Report of Waste Discharge that the City submitted to Regional Water Quality Control Board in February 1995. Past compliance record performance is summarized in the monthly monitoring reports submitted by the City to RWQCB. However, the history of compliance will not be included in the EIR/EIS because past limits, and attainment thereof, are not consistent with the more stringent impact criteria developed by which to evaluate the alternatives. Bioassay test methods and results are included in the EIR/EIS.

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41	B	Jean Starkweather, (L) Cont'd.	Add the following questions to the water quality analysis: What techniques for advanced treatment are being considered? Include a discussion of microfiltration for treating secondary waste. How does this process compare to the treatment system at the Laguna Plant in cost and effectiveness in removing heavy metals?			X	Treatment technology is not being considered because this is a disposal/reuse EIR/EIS, not a treatment project.
41	C		Include responses to the following comments in the Western Sonoma County Agricultural Irrigation Biological Studies: Map the lands to be irrigated. Will irrigation change existing land use? List crops that can and cannot tolerate reclaimed water. Identify soil types that comprise these lands. Are these crops compatible with soils located on irrigable lands? Are the soils in these areas likely to absorb pollutants?	TASK 18	TASK 18		Potential crop scenarios will be developed. Concentrations of metals, nutrients and salts in the wastewater, inherent levels in the soils, and the assimilative capacities of the soils will be discussed. The Regional Board typically requires that soil and groundwater conditions be monitored for wastewater irrigation projects, and that remedial management measures be developed and implemented, should unforeseen trends begin to appear.
41	D		What are the effects of irrigation runoff on the streams and well water located near these irrigation areas if pollutants are present?	TASKs 21, 30 and 32	TASKs 21, 30 and 32		Potential water quality and drinking water impacts are addressed in scope. See also the response to 41C.

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41	E,F	Jean Starkweather, (L) Cont'd.	Discuss the effects of flow augmentation on water quality and biological resources. Map the areas affected. How will water be released to these areas? Map the piped areas for transport and release of water. Indicate discharge points. What would be the impacts if these pipes leaked? How near would transport and release be to well water? Will discharges result in temperature changes in receiving waters? If so, how would this affect aquatic life?			X	Flow augmentation was eliminated as a project component during scoping.
41	G		Effluent should be tested for pathogens, viruses and other water quality constituents. Include a summary of test results in the EIR/EIS.	TASK 21	TASK 21		In scope.
41	H		Seems ineffective to establish water quality in streams slated for flow augmentation by visiting them for only one year, since water quality may increase or decrease, depending on varying rainfall.			X	The Draft Scope of Work included a hydrologic analysis for alternatives that incorporate flow augmentation. However, stream flow augmentation has been eliminated from the alternatives.
41	I		Why will the consultants visit Green Valley/Atascadero system and Walker Creek only twice, while the other streams will be visited five times?		TASK 21		Six site visits are now included in the scope. Walker Creek was eliminated because irrigation in Chileno Valley is no longer being considered.

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41	J	Jean Starkweather, (L) Cont'd.	It is not possible to determine the accuracy of the proposed Russian River Water Quality model from the scoping summary. Please thoroughly explain how this model will give valuable information with minimum sampling events and data collection.	TASK 28	TASK 28		A model is being developed in Task 28. The technical report for this task will include a description of the model and its limitations, as well as a description of sampling events and data collected to calibrate the model.
41	K		May water quality model be applied to discharge and flow augmentation scenarios for other streams affected by project alternatives?	TASK 21	TASK 21	X	Model applications include a hydraulic element, which is dependent on the site-specific stream morphology and flow conditions. Only the most general model results are transferable between watersheds.
41	L		Terrestrial biological studies of reservoir sites should focus on the quality and function of habitat for <u>all</u> wildlife. How are these areas used by native and migratory species? Including birds, how will establishing reservoirs on proposed sites impact native and/or migratory wildlife?	TASK 19	TASK 19		In scope.
41	M		What water quality guidelines will be used to determine whether wastewater is safe for aquatic species, and what species will be used as indicators?	TASK 20	TASK 20	X	The applicable State and federal standards will be used. These have been based on a variety of indicator species. This scope does not include bioassay surveys.

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41	N	Jean Starkweather, (L) Cont'd.	Since insect populations are an integral part of the aquatic habitat, all sampling with the exception of flow augmentation studies should take place in spring and summer, before insects have left streams for a terrestrial existence.		TASK 20		The objective of the sampling was to compare the results of this study with those from an earlier study in which collections were done in May and October. Revisions to the scope will include additional sampling.
41	O		Although sampling of "benthic organisms" will occur in the Laguna, Santa Rosa Creek, the Russian and Petaluma rivers, and the esteros, there is no invertebrate sampling for the other named creeks where flow augmentation and irrigation may have some impact. Since zooplankton and other invertebrates are food for aquatic and terrestrial animals, it is important to characterize these aquatic resources.		TASK 20 TASK 21		Sampling of benthos in perennial streams, but not in seasonal streams, was included in the scope because seasonal streams do not tend to host benthic populations that are expected to be affected by irrigation. However, California freshwater shrimp are present in Stemple Creek (which is seasonal). Therefore, benthic collections in irrigation area streams has been added to the scope.

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41	P	Jean Starkweather, (L) Cont'd.	For created wetlands, use maps to describe the proposed area. If a wetland already exists, the area should be shown before and after the proposed project. Maps should be complete enough so that they may be used to locate the site should the reader wish to visit the area. If a wetland exists, wetland design should specify the total number of acres to be created versus the number of acres existing. The design should specify the type of wetland that currently exists, including current vegetation and special status plants, an inventory of special status wildlife, and a general discussion of other plants and animals that may be affected by the project.	TASK 18	TASK 18	X	Maps of existing wetlands are in scope. Created wetlands, as a generic component and as part of the Community Separator Alternative, are no longer included in the EIR/EIS analysis, because it was found that there was insufficient, suitable land to implement the wetlands component.
41	Q		In analyzing created wetlands, include a discussion of soil suitability to insure that pollutants in the water would be less likely to leach into adjacent areas. What quantity of water will be stored in each created wetland and how deep will these wetland areas be? Will they be managed or unmanaged? Will there be any kind of monitoring programs? If so, who will monitor the areas?			X	See response to 41 P.

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41	R	Jean Starkweather, (L) Cont'd.	Wetland location and assessment should be accurate. If aerial photos were taken during spring or summer months when seasonal wetlands are dry, these areas may not show up and an additional method for locating wetlands should be used.	TASK 18	TASK 18		Wetlands determinations will include field verification of photo-interpretive mapping. Much of the work was accomplished in the Spring of 1995.
41	S		Most of the Santa Rosa/Subregional Wastewater project alternatives reflect expanded population growth. Assuming growth occurs, extrapolate from current data to predict future concentrations of toxics in clams at the time of maximum population or build-out.	TASK 34			Bioaccumulation in clams will be evaluated in the EIR/EIS.

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42	A	William Walton, Estero Mutual Water Company, Dillon Beach, (L)	<p>Do you have a plan for releasing treated sewer water from any and all dams/reservoirs in the West County option? Are you including overflow valves and pipes in your design? Do you have a drainage map which shows how and where this overflow will drain into the Estero de San Antonio?</p> <p>Do you have any information on how quickly these reservoirs will fill to an overflow point in a series of normal rainfall years?</p>	TASKs 18, 31, 38	TASKs 18, 31, 38		Water may be released into the creeks for two reasons: normal and expected low volume seepage, and releases for emergency lowering of the reservoir level if necessary for safety reasons. Normally, water would be discharged from the reservoirs only through pipelines to irrigation or wetland areas. The reservoir design must include an emergency overflow spillway and a controlled outlet release pipeline. Because the reservoir would be filled by pumping into it, the spillway would likely never be used. The outlet pipeline would lead both to the irrigation piping and to the creek discharge point for the emergency or fish flow releases mentioned above. Releases from the reservoirs into the creeks would follow the existing water courses to the ocean. It is currently uncertain how much, if any, flow would reach the ocean, because inclusion of wetlands or pump stations into the design could capture and remove nearly all such flow before it reached the Estero de San Antonio. These reservoirs would be filled by pumping wastewater into them and the maximum operating level would be maintained well below the spillway level. All candidate reservoir sites, if constructed, would be built to incorporate rainfall events.

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42	B	William Walton, (L) Cont'd.	Do you have the last three years of full chemical/biological analysis of your treated sewer water at the point of release from the treatment plant and/or similar analysis at other points farther downstream in your system?	TASK 21	TASK 21		This information is collected and will be included in the EIR/EIS. Further water quality model calibration has been added to the scope.
42	C		Will you allow Friends of the Esteros to take samples and have an independent analysis made periodically?			X	Esteros are under the jurisdiction of NOAA. Any sampling that would be done in the Esteros must be approved by NOAA.
42	C1		You are requested to answer these enquiries in writing in 30 days and prior to publication of the EIR/EIS, and to supply the full technical information requested in the above questions with an explanation of what is missing and why.	NA	NA	NA	There is no requirement in CEQA or NEPA to answer these inquiries within 30 days of their being received. The Draft EIR/EIS will address these inquiries as appropriate, and the public will have the opportunity to review this information both prior to release of the Draft EIR/EIS and again during the formal comment period on the Draft EIR/EIS.
42	D		Any increase in the height of the water flowing in the Estero do San Antonio would endanger our water supply by possibly flooding our collection pond, thus contaminating our drinking water, by possibly damaging our electrical service and 100 horse power motor/pump, and by possibly weakening or damaging the PG&E power pole bringing electricity to the site.	TASK 18	TASK 18		Potential project effects on water surface elevation will be evaluated.

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42	E	William Walton, (L) Cont'd.	Our interest in this matter is not to block the irrigation portion of the (1991) EIR/EIS, but rather to insure that adequate legal, financial, and structural arrangements are in place well before any increase in the Estero water level occurs, in order to compensate us in a timely and adequate manner for repairs and rebuilding of our estero sited facilities, and, additionally, to indemnify us against loss caused by contamination of the water supplied to our customers.	NA	NA	NA	Comment noted.
42	F		(The 1991) EIR/EIS appeared to presume a summertime irrigation season and no lasting effect during the winter rainy season on the water level of the Estero. This is not a safe presumption over the long term. A number of ranchers have testified that with irrigation, they might raise three crops a year of cattle forage. This might require irrigation during most or all of the year.		TASK 21		Estero studies will be conducted per response 2 J.
42	G		Additionally, future growth might prompt Santa Rosa to release treated sewer water into Stemple Creek/Estero de San Antonio, which could raise its height to a danger point for our facilities.	NA	NA	X	None of the alternatives include direct discharge to the Esteros. See response to comment 42 A for discussion of release issue.

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42	H	William Walton, (L) Cont'd.	Commenter submitted a one-page fact sheet, prepared in January, 1992, describing the Estero Mutual Water Company and its service area in Dillon Beach.	NA	NA	NA	This comment has been forwarded to the Board of Public Utilities.
43	A1	Lindsay Rehm, The Environmental Forum of Marin, Larkspur (L)	Identify the most environmentally superior alternative in the EIR, in particular one that will have no long-term effects on neighboring wetlands. Show the routes of all pipelines and other facilities needed for water transport, storage, reuse or discharge, and identify the potential impacts of the construction and use of these facilities.	TASKs 31 and 40			Identification of an environmentally superior alternative is required by CEQA. However, the purpose of the EIR/EIS is not to recommend any specific alternative, but rather to assess all of them at an equal level of detail, so the BPU can use this information in reaching its decision. Facilities and the potential impacts of their construction and operation are in scope.
43	A		Will storage facilities be located on or off stream? How will construction of these facilities affect the creeks?	TASKs 31, 39	TASKs 31, 39		In scope. All potential reservoir sites are on-stream.
43	B		In identifying possible storage facilities, describe the existing conditions of the streams along which they will be built.	TASKs 21 and 39	TASKs 21 and 39		See response to comment 2 N.
43	C		Describe riparian vegetation, water quality, habitat value, and use by wildlife.	TASKs 19, and 21	TASKs 19, and 21		In scope.
43	D		Describe fish and other beneficial uses of the creek.	TASKs 20, and 21	TASKs 20, and 21		In scope.
43	E		Describe how construction and operation of wastewater facilities would adversely affect the short- and long-term functioning of each creek.	TASKs 19, 20, and 21	TASKs 19, 20, and 21		See response to comment 2 N.

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43	F, G, H,K	Lindsay Rehm, (L) Cont'd.	<p>Identify and describe the current conditions of all streams to be considered. Are there existing diversions from them? What is the impact of the diversions? Have they caused the stream to go dry in summer or any loss of riparian habitat?</p> <p>Describe the site where water would be added. What are the potential impacts (loss of vegetation, erosion, etc.)? What are the probable effects on wildlife?</p> <p>What is the anticipated quality of the water when it enters the creek? When it reaches the end of the stream and empties into San Pablo or Tomales Bay or the Petaluma River?</p> <p>Show the location of the discharge of all flow-augmented streams.</p>	TASK 21	TASK 21	X	Flow augmentation is not included in the project description. Current conditions will be described in the setting sections of the EIR/EIS.

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43	I	Lindsay Rehm, (L) Cont'd.	What will be the impact on habitat or species living in or along the stream?	TASKs 19 and 20	TASKs 19, and 20		In scope.
43	J		What precedent will construction of a system discharging water into a small stream have?	NA	NA	NA	The precedent for discharge to small streams exists in the project area and elsewhere in California. For example, the existing Santa Rosa discharge occurs to the Laguna de Santa Rosa and Santa Rosa Creek, which are small streams.
43	L		Regarding possible impacts on wetlands: - Identify acreage and type of wetland to be impacted. - Describe existing wetland, its habitat value and impacts on it. - Describe how treatment wetlands will function. How will vegetation be managed? - Will there be a backup (treatment disposal) system? Describe bioaccumulation studies. - Will there be monitoring to trace pollutants/impacts? - How will you ensure no adverse impact on wildlife attracted to wetland? - Will there be wetlands creation in baylands? If so, will loss of tidal marsh be addressed?	TASK 18	TASK 18	X	If created wetlands are required as mitigation, size, location and type of wetland will be identified, loss of existing habitat and its impact will be assessed, pollutants and impacts on food chain in created wetlands will be addressed. Wetlands creation for wastewater treatment is no longer proposed.

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43	M	Lindsay Rehm, (L) Cont'd.	For wastewater used for irrigation: - Are all soils suitable for growing crops? - Describe potential accumulation of heavy metals in soil. Could harmful constituents end up in food? - How will runoff be managed to protect streams and downstream resources? - How will potential salt buildup be handled?	TASK 18	TASK 18		See 2 I, 2 S, and 41 C.
44	A1	Edward Ueber, Gulf of Farrallones National Marine Sanctuary, (L) (See also No. 29)	An Ocean Outfall option has been added. Prepare a determination of where the sewage water goes, discharge components, their disposition in the near-shore or ocean environment, bioconcentrations of these components by marine organisms and general oceanographic aspects over two upwelling seasons.			X	The Ocean Outfall Alternative has not been added to the options under consideration.
44	A		Believes (formerly) proposed West County alternative will result in serious injury to the resources and qualities of the Estero Americano and Estero do San Antonio. Unable to ascertain impacts on Bodega and Tomales Bays and ocean areas. NOAA opposes (former) West County Alternative.			X	This statement is based on the previous EIR/S, which is based on a different analysis of a potentially different project. The current EIR/S will provide an analysis of all of the currently proposed alternatives.

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44	B	Edward Ueber, (L) Cont'd.	An amendment and permit to allow discharge to Americano Creek should not be issued until the (1991) DEIR/S is revised and resource agencies have reviewed results.	NA	NA	NA	This statement is based on the previous EIR/S, which is based on a different analysis of a potentially different project. The current EIR/S will provide an analysis of the proposed alternatives.
44	C		The (1991) DEIR/S makes no reference to NOAA's review and does not incorporate any data directly applicable to the West County alternative.	TASK 3			NOAA's reviews of the previous wastewater project will be reviewed in regard to Estero studies.
44	D E		Studies should be done <u>before</u> the onset of any projects to determine impacts and consequences to environment. It is impossible to assess habitat impacts and benefits without a complete analysis of each alternative's operation over a range of possible hydrological conditions (extremely dry or wet, and normal).	TASK 21	TASK 21		See response 2 J.
44	E, AE		Baseline studies of natural environment and quality of receiving waters need to include hydrologically normal as well as extremely dry (or wet) periods.	TASK 38	TASK 38		Monthly flows for some of the years cited are available from previous studies. The analysis will be updated to provide information for 1986 to date. There is no indication that the daily flows are required for the aquatic analysis.

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44	F	Edward Ueber, (L) Cont'd.	Concern expressed that much of the area proposed in 1991 as mitigation wetlands or riparian habitat was not in control of the proponent. Therefore, the DEIR/EIS appeared to portray <u>minimum</u> expected habitat losses and <u>maximum</u> achievable habitat gains, thus making it likely that many of the predicted benefits might not be achieved.	TASK 18	TASK 18		Availability of properties for mitigation/enhancement for wetland loss will require policy direction. Comment based on previous DEIR/EIS is not necessarily pertinent to the current study.
44	G		Fully consider a greatly enlarged irrigation base for alternatives other than West County.	TASK 18	TASK 18		Current scope of work considers a full South County Irrigation option.
44	G1		Incorporate more elements of the conservation alternative into the final project alternative.	TASK 29	TASK 29		In scope.
44	G2		Any West County alternative should consider using Stemple Creek instead of Americano Creek, as there is probably a better chance of anadromous fishery enhancement in Stemple Creek.			X	Flow augmentation is no longer being considered as a component of the Long-Term Project.

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44	H	Edward Ueber, (L) Cont'd.	Current discharge to the Laguna de Santa Rosa may be the principal factor in the reduction of steelhead runs in Santa Rosa and Mark West Creeks. Persistence of runs does not necessarily support the conclusion that treated wastewater does not cause steelhead to avoid the Laguna.	TASK 14			Studies are being conducted in scope of Fisheries Task.
44	I		Identify the location and designation of any geodetic control monuments that may be affected by the proposed project.	NA	NA	NA	The minimal subsurface exploration work being done for geotechnical studies in support of the EIR/EIS will not disturb any geodetic survey control monuments. Any monuments that would be affected by construction of a selected project and required relocation would be appropriately addressed during project design.
44	II		NOAA recommends that existing data be reanalyzed to determine deficiencies and areas of conflict. Fully consider and discuss other reasonable alternatives. Implement new data collection and research to investigate gaps and contradictory information.				The six alternatives being evaluated in this EIR/EIS have been determined to be a reasonable range of alternatives for this project. The alternatives and components are being analyzed at an equal level of detail. Existing information has been reviewed and new data will be provided as needed.

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44	12	Edward Ueber, (L) Cont'd	DEIR/EIS should focus on the exact magnitude and quality of the input to the estero ecosystems and how these will be affected over the short and long terms. Review past resource agency concerns regarding Laguna discharge effects on steelhead and incorporate these. Identify areas of uncertainty and data conflicts for decision makers.	TASKs 20, 21, 28	TASKs 20, 21, 28		In scope.
44	J		NOAA fears that DEIR/EIS will fail to mention its jurisdiction over the Gulf of the Farallones National Marine Sanctuary (GFNMS) or to address its concerns.	TASK 10			We have addressed NOAA's study requests in the scope of work.
44	K		Previous EIR/EIS failed to identify and provide specific subtotals for created vs. enhanced wetlands.	NA	NA	NA	Wetlands creation has been eliminated from the study.
44	L		Previous EIR/EIS stated that elimination of a hypersaline environment would be a beneficial impact; however, the Sanctuary was designated in part to protect exactly those species that have uniquely adapted to this rare and fragile ecosystem.	TASKs 20 and 21	TASKs 20 and 21		Comment noted. The scope of work for evaluation of the Estero has been given to NOAA to review as a cooperating agency with the COE. The environmental consultants and the City of Santa Rosa have no preconceived views about the benefits of hypersalinity in the Esteros. The EIR/EIS will evaluate the potential impacts to water quality in the Esteros.

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44	M,N	Edward Ueber, (L) Cont'd	NOAA does not agree that the creek watersheds feeding the esteros are heavily degraded (as was stated in the previous EIR/EIS.) Only specific areas of the creeks have been impacted by cow manure and trampling of the banks. The esteros at the receiving end of the creeks are some of the most productive habitats within the GFNMS. Discharging (reclaimed water) into the esteros would, in fact, compound the current degradation. NOAA encourages initiatives to work directly with farmers to address the environmental impacts of farming.	TASK 21	TASK 21	X	Stream augmentation has been dropped as an alternative to be studied. A water quality analysis will be conducted to determine the potential impacts of alternatives to the Esteros.
44	O		The actual amount of total proposed flow into the esteros from the West County alternative is unspecified.	TASK 18	TASK 18	X	No direct discharge or flow augmentation is proposed. The EIR/EIS will evaluate whether there would be any impacts to the Esteros from indirect discharge resulting from irrigation.
44	O1		The time period over which water volume might increase is not given. It may take a couple of years before changes become evident.	TASK 18	TASK 18		See response to 44 O

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44	MN	Edward Ueber, (L) Cont'd	NOAA does not agree that the creek watersheds feeding the esteros are heavily degraded (as was stated in the previous EIR/EIS.) Only specific areas of the creeks have been impacted by cow manure and trampling of the banks. The esteros at the receiving end of the creeks are some of the most productive habitats within the GFNMS. Discharging (reclaimed water) into the esteros would, in fact, compound the current degradation. NOAA encourages initiatives to work directly with farmers to address the environmental impacts of farming.	TASK 21	TASK 21	X	Stream augmentation has been dropped as an alternative to be studied. A water quality analysis will be conducted to determine the potential impacts of alternatives to the Esteros.
44	O		The actual amount of total proposed flow into the esteros from the West County alternative is unspecified.	TASK 18	TASK 18	X	No direct discharge or flow augmentation is proposed. The EIR/EIS will evaluate whether there would be any impacts to the Esteros from indirect discharge resulting from irrigation.
44	O1		The time period over which water volume might increase is not given. It may take a couple of years before changes become evident.	TASK 18	TASK 18		See response to 44 O

TABLE 2: SCOPING LETTERS/PHONE CALLS

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44	T	Edward Ueber, (L) Cont'd.	Previous EIR/EIS estimated 16 acres of salt marsh in esteros would change into brackish marsh in 50 years, assuming 7cfs flow of reclaimed water in creeks. What other impacts might occur from constituents in the water?				Flow augmentation is no longer in the scope.
44	U		How much increase in agricultural productivity will occur? Types of pesticides and fertilizers which will be applied? How much runoff into creeks? Are farmers willing to change their practices? Are soils adequate for these changes?	TASK 18	TASK 18		See response to 2 I. Irrigation suitability and management are addressed in scope.
44	U1		Flow scenarios would be different if farmers elected not to take the water or dropped out later. Before there can be any analysis, evidence of long-term, irrevocable agreements will be needed.	TASK 18	TASK 18		Sufficient acreage has been identified and preliminarily screened to continue with analysis of the West County Reclamation Alternative, which the BPU selected as one of the alternatives to be analyzed in the EIR/EIS.
44	V		What are the impacts (economic/social, environmental) of changing to other crops; it seems that an increase in productivity/herd size could compound problems cited earlier.	TASKs 18, 21 and 33	TASKs 18, 21 and 33		Potential environmental and socio-economic impacts of conversion to irrigated agriculture will be analyzed.
44	W		It appears there could be significant impacts to the water supply of West County residents from the West County Reclamation Alternative.	TASK 30	TASK 30		In scope.

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				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
44	X	Edward Ueber, (L) Cont'd.	Any stream enhancement project needs to address other factors which could limit fish population, including stream habitat structure, water temperatures, food supply, water quality, sediment loading, streambed composition, etc.	TASKS 18 AND 21			Flow augmentation is not included as a project component, but effects of other flow sources will be evaluated. Sediment load evaluation will be considered.
44	X1		It is unclear how the proposed project would affect anadromous fish populations.	TASK 14			In scope.
44	X2		Discuss red tides and toxic dinoflagellates; review California DHS summary of reports for the previous 20 years.		TASK 21		See responses to 21 A and 35 A.
44	X3		Illustrate the shallow water table and the fact that water supplied to the surface as irrigation could rapidly saturate the water table, affecting local water wells and providing additional flow to the creeks and esteros.		TASKs 18 and 30		See responses to Comments 14 A through 14 G.

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44	X4	Edward Ueber, (L) Cont'd.	Particulate loading in the estuarine and coastal environment could increase significantly, leading to significant water column light attenuation and deterioration of water quality for submerged macrophytes and phytoplankton. Fine clay/silt particles could remain suspended for a long period of time. The consequence could be a reduction in the 1% light level, which would come under the EPA regulations limiting deterioration of this water quality parameter.	TASKs 18 and 21	TASKs 18 and 21		Sediment load evaluation will be considered. See response to 44 X.
44	X5		Seasonal flow fluctuation will greatly enhance erosion in both the estuarine and fresh water systems. Sea grasses "recharge" their carbon reserves and initiate rapid growth in late winter and spring. Limitations in light availability at these times could impact plant growth rate and their ability to recharge subterranean reserves.	TASKs 18 and 21	TASKs 18 and 21		See response to 44 X.
44	X6		Document/substantiate any conclusions suggesting benefits to aquatic life as a result of the West County Reclamation Alternative.	TASKs 20 and 39	TASKs 20 and 39		Potential impacts will be based upon impact criteria. These criteria will clearly state the measures being used to make a determination of impact.

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44	X7	Edward Ueber, (L) Cont'd.	The DEIR/EIS should discuss current levels of copper bioaccumulation in Tomales Bay bivalves and other benthic species in order to assess the cumulative effects of additional copper loading to sediments and bioaccumulation in the environment.	TASKs 18, 21 and 34	TASKs 18, 21 and 34	X	An analysis of sediment loading and bioaccumulation is in scope. See also response to comment 22, Table 1
44	Y		The previous EIR/EIS made no quantitative predictions as to net changes in streambed configuration, which could drastically affect the success of proposed riparian, wetland and aquatic enhancements.			X	Flow augmentation is no longer included as a study component.
44	Y1		Estuary's hydrology is the single most important controlling factor of the ecosystem. Amount and timing of freshwater inflows are both basic attributes which could be altered by wastewater discharge. Wastewater inflows could increase the volume of freshwater inflow to the estuary, resulting in several negative impacts (not specified).	TASKs 18 and 21	TASKs 18 and 21		See responses to comments 44L and 44O.
44	Y2		Flow entering esteros in summer would come entirely from proposed project. Allowing such flows rests on the disputed assumption that the esteros are a degraded habitat.	TASKs 18 and 21	TASKs 18 and 21		See responses to comments 44L, 44M,N and 44O.

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44	Y3	Edward Ueber, (L) Cont'd.	What will be the cumulative impact of increased metals loadings from reclaimed water? An agreement needs to be made with farmers on best management practices for irrigation water. Groundwater flow into the esteros could increase as a result of the project.	TASKs 18 and 21	TASKs 18 and 21		See response to 44 O.
44	Y4		Validate any models used to derive water quality assessments.	TASK 21	TASK 21		In scope.
44	Y5		How will nutrient loadings to the esteros be controlled?	TASKs 18 and 21	TASKs 18 and 21		In scope.
44	Y6		The need to consider a pump to mitigate overfilling of either estero implies there is a major threat of overloading the ecosystem.			X	Comment relevant to project analyzed in previous EIR/EIS. Flow augmentation is not a part of this project.
44	Z		Project ocean impacts need to be based on appropriate assumptions about mixing rates and estero water quality. Mixing will vary over the tidal cycle. This needs to be taken into account.	NA	NA	NA	Flow augmentation is no longer included as a study component. Also see response to comment 22 in Table 1.
44	AA		Do not merely describe, but also analyze the function of plant species in the West County ecosystem.	TASK 18 TASK 19	TASK 18 TASK 19		Comment refers to a previous EIR/EIS. This EIR/EIS will provide an analysis of vegetation in the ecosystem's ecology.

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44	AA 1	Edward Ueber, (L) Cont'd.	Any analysis of the benefits to be derived from wetland creation or enhancement need to be based on an analysis of how these wetlands function, which, requires detailed study of these ecosystems processes to understand how they benefit the biota which use them.	TASK 18	TASK 18		Wetlands creation has been removed as a project component. Wetlands creation may be used as mitigation of loss of wetlands. If they are recommended as mitigation, experts in wetlands creation will be used to develop them.
44	AA 2		It is vital to recognize the role and value of the existing saline system (in the esteros) within the region in order to then determine whether or not switching from saline to brackish would have a negative impact.	TASK 21	TASK 21		See response to 44 L.
44	AB		Siting of a dam near an earthquake fault could result in a catastrophic event causing widespread injury to life and property and destroying the entire estero ecosystem. The likeliness of this occurring and the magnitude of the threat need to be determined.	TASK 35	TASK 35		In scope.
44	AC		Archeological resources are a major concern under the Sanctuary mandate. Proposed studies need to evaluate the possible impacts of the proposed project on such resources.	TASK 36	TASK 36		This comment refers to a different project. Archaeological resources will be evaluated for each proposed alternative.
44	AD		An Ocean Outfall Alternative would require comprehensive studies to evaluate its potential impacts to ocean ecosystem functions.			X	An ocean outfall alternative has been dropped from consideration.

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44	AE	Edward Ueber, (L) Cont'd	Baseline surveys of the natural environment should take into account periods of low, high and average flow in order to accurately reflect the natural condition of the environment.	TASK 21	TASK 21	X	An ocean outfall alternative has been dropped from consideration. Flow data and water quality sampling will be used to establish existing conditions in project area streams, rivers and the esteros.
44	AF		Site-specific studies are recommended to determine whether the Petaluma Hill Road, Adobe Road, and Lakeville/Sears Point areas would be suitable for irrigation as proposed in the South County Alternative.	TASK 18	TASK 18		Comment refers to alternative as described in previous EIR/EIS. Irrigation suitability analysis for South County Reclamation is in scope.
45	A	Jean Severinghaus, Mill Valley (L)	Move the proposed site out of the Esteros Americano and San Antonio and the Button Ranch and into the north San Francisco Bay flood plain, whose volume could much more easily tolerate the volumes of effluent.	NA	NA	NA	The selection of a project alternative for implementation can occur only after completion and certification of the EIR/EIS, which will analyze all potential alternatives and components to an equal level of detail and provide the BPU with the information they will need to make their decision.
45	B		I kayak the esteros regularly and am impressed with their fragility. Large volumes of fresh water or effluent would change all that forever.	TASKs 18 and 21	TASKs 18 and 21		The EIR/EIS will address potential impacts from reclaimed water to the water quality and ecology of the esteros.
46	A	Len Swenson, Sierra Club, Sonoma County Group, Santa Rosa (L)	Will the soils be permeable enough to receive and hold treated wastewater as underground storage?	TASK 22			In scope.

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44	AE	Edward Ueber, (L) Cont'd	TASK 21	TASK 21	X
		Baseline surveys of the natural environment should take into account periods of low, high and average flow in order to accurately reflect the natural condition of the environment.			An ocean outfall alternative has been dropped from consideration. Flow data and water quality sampling will be used to establish existing conditions in project area streams, rivers and the esteros.
44	AF		TASK 18	TASK 18	
		Site-specific studies are recommended to determine whether the Petaluma Hill Road, Adobe Road, and Lakeville/Sears Point areas would be suitable for irrigation as proposed in the South County Alternative.			Comment refers to alternative as described in previous EIR/EIS. Irrigation suitability analysis for South County Reclamation is in scope.
45	A	Jean Severinghaus, Mill Valley (L)	NA	NA	NA
		Move the proposed site out of the Esteros Americano and San Antonio and the Button Ranch and into the north San Francisco Bay flood plain, whose volume could much more easily tolerate the volumes of effluent.			The selection of a project alternative for implementation can occur only after completion and certification of the EIR/EIS, which will analyze all potential alternatives and components to an equal level of detail and provide the BPV with the information they will need to make their decision.
45	B		TASKs 18 and 21	TASKs 18 and 21	
		I kayak the esteros regularly and am impressed with their fragility. Large volumes of fresh water or effluent would change all that forever.			The EIR/EIS will address potential impacts from reclaimed water to the water quality and ecology of the esteros.
46	A	Len Swenson, Sierra Club, Sonoma County Group, Santa Rosa (L)	TASK 22		In scope.
		Will the soils be permeable enough to receive and hold treated wastewater as underground storage?			

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46	F	Len Swenson, (L) Cont'd.	How can safety "hazards" from ponding of wastewater be mitigated?	TASK 18	TASKs 18 and 39		The evaluation of potential impacts from mosquitoes has been added to the scope. Ponding would be minimized through the implementation of the Irrigation Management Plan.
47	A	Joseph Pence, (L) Sebastopol	To do anything with wastewater other than to ultimately divert it to produce more agricultural products is indefensible.	X			Two alternatives featuring agricultural reuse and its potential effects are being analyzed in the EIR/EIS.
48	A	Bill Kortum, Petaluma (L)	The South County project has the advantages of serving more diverse agriculture, has more heat for growing crops, has greater impact on strengthening the agricultural economy and therefore thwarting the loss of agricultural land to development pressure. Developing methods for using wastewater on Reyes soils will double the acreage available for wastewater reclamation.	TASKs 18 and 39	TASKs 18 and 39		The EIR/EIS will fully assess the South County project, including its effects on land use and the agricultural economy. The analysis of Reyes soils for irrigation is in scope.

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48	B	Bill Kortum, Cont'd.	If Santa Rosa's South County pipeline goes right past Petaluma, the EIR/EIS should address the sizing of the system to allow Santa Rosa to bid on storage and distribution of Petaluma's wastewater. The economy of scale would make Santa Rosa highly competitive; the added income would have a positive effect on the operations budget. The cost for Petaluma to build tertiary facilities to become a partner should be addressed in the EIR/EIS.			X	See response to comment 57 in Table 1.
48	C		Santa Rosa's partnering with Petaluma is justified under the following: 1. Project objectives: "Develop a program that can be successfully financed and is economically feasible."			X	See response to comment 59 in Table 1.
48	D		2. (Task 31): "What are the future cost estimates in terms of land, labor dollars, and energy?"	TASK 33	TASK 33	X	Costs will be evaluated in the scope of work. See response to 48C.

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48	E	Bill Kortum, Cont'd.	3. (Issues--Policies/Procedures): "What is the problem being dealt with throughout the county, yet the City of Santa Rosa maintains control of the project?" "Regional cooperation on these issues between planning agencies would be the most rational basis for a long-term environmentally sound project."	NA	NA	NA	The issues cited here would remain with or without a joint venture with Petaluma. Santa Rosa has been enjoined by the Regional Board to solve its wastewater disposal problem. While cooperation with Petaluma could be attractive, the City and Subregional System must move ahead and meet their responsibilities. See also response to comment 59 in Table 1.
48	F		For the US Army Corps of Engineers to expect an inland city to pump its wastewater a great distance and lift every gallon over a coastal range requiring high energy use is profoundly unfair and impractical.	NA	NA	NA	Ocean Outfall is not an alternative for this project.
49	A	Russell Ridge, Point Reyes Station (L)	My concerns are with the West Co. Alternative and the need for studies on the effects of treated wastewater releases into the esteros, and the effects of heavy metals on fauna in esteros, Bodega Bay and possibly Tomales Bay.	TASKs 18 and 21	TASKs 18 and 21		Studies will be conducted in the West County will allow the consultant team to adequately evaluate the potential impacts to the Esteros. If a West County alternative is selected, on-going monitoring would be part of mitigation.

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49	B	Russel Ridge, Cont'd.	The following concerns are listed as issues in the proposed Scope of Work: Criteria, Fisheries, Migrating Fish, Sanctuary. I can not imagine these concerns could be adequately addressed within your proposed time schedule.	X	X		The study program satisfies the requirements of the regulatory agencies and includes adequate time to meet the requirements.
50	A	Barbara Salzman, Marin Audubon Society, Mill Valley (L.)	EIR/EIS must include a setting section that adequately describes the habitats, including rivers, streams, creeks, wetlands, riparian vegetation, grassland, diked bayland, trees, forests, chaparral which would be affected by each alternative.	X	X		Environmental setting will be provided for each environmental category.
50	A1		Describe all special-status, common and migratory species at each site and evaluate the local, national and international importance of these habitats for them	TASKs 19 and 20	TASKs 19 and 20		In scope.
50	A2		Provide mitigation for impacts to wildlife and their habitats. Construction of reclamation facilities should not be considered mitigation for loss of natural habitat.	TASKs 18 and 19	TASKs 18 and 19		Mitigation will be addressed as needed in the EIR/EIS. See response to 50A.
50	A3		The environmentally superior alternative should be identified. At least one alternative should have no impacts to wetlands.	X			An environmentally superior alternative will be selected as required in CEQA. The Geysers, the 20% Russian River Discharge and the No Project Alternative were designed to have minimal impacts to wetlands (pipelines).

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50	B	Barbara Salzman, Cont'd.	What facilities are needed for rapid infiltration? Describe the process. What facilities are needed for direct discharge? Describe this process.	TASK 31	TASK 31	X	Rapid infiltration has been dropped from further consideration in the project. The outflow facilities will be described in the Project Description section of the EIR/EIS.
50	B1		Describe the characteristics and operation of wetlands created for reuse capacity. How would these be different from storage reservoirs?			X	Created wetlands have been dropped from consideration as a project component.
50	B2		How would water be transferred from storage reservoirs to irrigation lands?	TASKs 31 and 39			Wastewater would be transferred via pipeline.
50	B3		Describe the design and operation of created wetlands.			X	See response to 50 B1.
50	B4		Wetlands proposed for this project would be needed to mitigate direct wetland losses and other adverse impacts of this project.	TASK 18	TASK 18		Wetlands as mitigation for project impacts are in scope.
50	B5		How would sludge be a component of the project?			X	The management of wastewater sludge from the treatment plant is not a component of this wastewater disposal project.

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50	B6	Barbara Salzman, Cont'd.	What back-up facilities are planned for each alternative? Location? How operated?	TASK 31	TASK 31		Whichever project is adopted and installed would likely be implemented in phases and would include a contingency plan with components to accommodate unusual conditions. The project's components would be sized to accommodate a specified level, of reliability. To increase the reliability level, some contingency plan components are being investigated and would be available, such as emergency water conservation, winter time irrigation disposal, or limited increased direct discharge to surface waters.
50	B7		Discuss components of maximum conservation program. Why was this rejected as an alternative component?	TASK 29	TASK 29		Several levels of water conservation measures are being investigated. The Board of Public Utilities and the member agencies will have an opportunity to adopt measures of varying stringency to conserve water and thereby reduce the cost and scale of the wastewater disposal facilities. Some of the components included in what was previously referred to as "Maximum Conservation" have been eliminated from further evaluation, specifically greywater and composting toilets. These are not being considered because of public health concerns, and concerns over the inability to guarantee the long-term operational reliability of these systems with changing ownership. The programs which will be considered are those that have quantifiable and sustainable results.

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50	B8	Barbara Salzman, Cont'd.	What outflow facilities are needed for Russian River and stream augmentation?	TASK 31	TASK 31	X	Stream augmentation is no longer a component of the long-term project. See response to 50 B.
50	C		What would a "full testing program" referred to in #7 consist of?				We are unable to respond due to the unclear reference to "#7".
50	C1		What heavy metals and other constituents remain in the wastewater after tertiary treatment? At what levels? What tests are used to detect these? How frequently does the plant exceed discharge limits allowed by its NPDES permit?	TASK 34			The characterization of effluent quality is in scope. Information includes any violations of discharge limits for various constituents.
50	C2		What constituents do the various advanced treatment processes remove? What ones, if any, can remove all heavy metals? Does Santa Rosa propose to use processes that remove the maximum constituents? If not, why not?			X	Treatment alternatives are not part of the Long-Term Project or this scope. The EIR/EIS is evaluating various disposal/reuse options for treated wastewater.
50	C3		Why cannot the Subregional partners review and revise their growth projections? Is the project growth going to pay for itself, including the high cost of environmental review and mitigation for what could be massive environmental damage?	TASKs 33 and 39		X	Population projections will be evaluated. The Subregional partners were asked to reconfirm their General Plan growth projections at the beginning of the environmental process. The project will not ask these jurisdictions to re-evaluate their projections.

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50	D	Barbara Salzman, Cont'd.	Specify whether open space loss would be of private or public open space. Are any lands currently not used for grazing or crops being suggested for irrigation?	TASKs 18 and 39			In scope. The EIR/EIS will evaluate changes in land use as a result of the project. Potential irrigation lands include urban green areas, golf courses and a wide range of agricultural lands not just those used for grazing.
50	D1		What criteria are used to choose irrigation lands? What crops would these lands be suitable to grow? The classification of soils and their suitability for growing irrigated crops should be examined. What controls could be exercised over new irrigation lands?	TASK 18	TASK 18		In scope. The criteria used to choose irrigation lands were approved by the Board of Public Utilities and will be included as an appendix to the EIR/EIS. A determination of suitable crops, classification of soils and irrigation management plans are part of the EIR/EIS evaluation.
50	D2		Provide information about growing irrigated crops in the diked baylands, including current crops grown; proposed crops; soil improvements needed, if any; measures needed, if any, to lower the water table, and their costs. Would intensive crop growing on the bay lands contribute to their subsidence? Would levees have to be maintained, and at what cost?	TASK 18	TASK 18		In scope. The project description includes an irrigation management plan for the baylands area. Measures required to successfully grow and manage crops in the baylands area will be included. Subsidence potential will be evaluated in the EIR/EIS.
50	D3		The study of impact on the agricultural economy should address both potential adverse as well as beneficial impacts.	TASK 33	TASK 33		In scope.

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50	E	Barbara Salzman, Cont'd.	How would visual, land use and recreation studies be coordinated with the biological management of the plan for proposed wetlands in the Community Separator Alternative.	TASKs 18, 37, 39	TASKs 18, 37, 39	X	Visual, land use and recreation studies, including potential effects on wetlands, are in scope. However, created wetlands proposed as part of the Community Separator Alternative are no longer in scope, because enough suitable land is not available.
50	F		What would prevent constituents in tertiary treated water from accumulating in soils and bioaccumulating in wildlife using Sonoma County cropland? Discuss impacts from accumulation of heavy metals and other constituents in irrigated soils, wetland soils, and sediments of streams.	TASKs 18, 19, 20, 21, 27, 34	TASKs 18, 19, 20, 21, 27, 34		See 41C. Sediment quality characterization is also in scope.
50	F1		Include characterization of irrigation water quality, plus literature review of information on soil characteristics in wetlands, streams and lands on which wastewater will be used.	TASKs 18, 21, 27	TASKs 18, 21, 27		In scope.
50	F2		What is the potential for stream bank erosion from augmented flows and/or increased runoff from irrigation?	TASK 18, 21	TASK 18, 21	X	Stream augmentation is not a component of the Long-Term Project. Irrigation runoff analysis in scope.
50	F3		Geotechnical and safety data should be developed to the same level of detail for all potential reservoir sites. Why is only limited lab testing of soils proposed for the West and South County alternatives?	TASK 35	TASK 35	X	Safety data will be developed at an equal level of detail for all alternatives. The soil testing being conducted is sufficient to determine the capability of the potential reservoir sites to accommodate a reservoir.

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50	G1	Barbara Salzman, Cont'd.	Hydrology and watershed should be characterized for each stream being proposed for augmentation, proposed reservoir, or that could receive irrigation runoff. All major and minor drainages should be mapped and shown on a figure.	TASKs 18, 21, 38	TASKs 18, 21, 38	X	Flow augmentation has been eliminated as a study component. All drainages will be evaluated that are being proposed for a reservoir or which could receive irrigation runoff.
50	G2		What are the potential impacts of excess irrigation and reservoir seepage for the West and South County Reclamation and Community Separator alternatives?	TASKs 18, 21, 38	TASKs 18, 21, 38		See response to comment 2C. Irrigation return flows will be discussed in the irrigation analysis and shallow groundwater studies. Potential reservoir seepage losses will be covered in the hydrology scope of work.
50	G3		Will reservoirs be located on- or off-stream?	TASKs 18, 31, 38	TASKs 18, 31, 38		Reservoir sites with small watersheds may be allowed by the regulatory agencies to be "off-stream", but reservoirs with larger watersheds may be required to be "on-stream" or may require diversion of watershed runoff around the reservoir to continue downstream. This will be decided by the regulatory agencies.

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50	G4, 6	Barbara Salzman, Cont'd.	Provide streamflow data for all streams being considered for reservoir construction. Simply updating Russian River and other data is not sufficient. What changes would occur to the current hydrology of the drainages at the dam and storage reservoir site?	TASKs 18, 21, 38	TASKs 18, 21, 38		The hydrology scope of work has been modified to include an analysis of surface water runoff into the reservoirs and spillway outflow. See also responses to comments 2 A-F.
50	G5		How would flow augmentation affect each stream system on which it is proposed?			X	See response to comment 44 Y.
50	G7		Characterize water quality and quantity at each proposed wetland, flow augmentation, irrigation runoff and reservoir site.	TASK 21 TASK 38	TASK 21 TASK 38	X	Created wetlands and flow augmentation have been dropped from the study. See response to comment 50 G4. Water quality characterization in scope.
50	G8		Characterize sediment quality at all irrigation, flow augmentation, wetland, and reservoir sites.			X	Sediment quality will not be assessed at all project sites because sediment quality is not diagnostic of potential impacts.
50	G9		On what basis is the assumption made that wastewater discharge to streams is appropriate?	TASKs 21, 32, 34, 39	TASKs 21, 32, 34, 39		No such assumptions are made. Discharge to the Russian River and Laguna are components subject to evaluation.
50	G10		Could chlorinated hydrocarbons impact facilities or systems the wastewater is discharged into or used for, in addition to Kelly Wetlands?	TASKs 32, 34			Previously conducted toxicity studies will be evaluated in the scope.
50	G11		How long and how frequently have trace metals been monitored in the Laguna? What tests are used?	TASK 39			Existing monitoring programs will be described in the DEIR/S

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50	G12	Barbara Salzman, Cont'd.	How could heavy metal residue, salts and other wastewater constituents discharged to constructed wetlands affect the food web in the short and long term?	TASK 34			Potential effects on food web are in scope.
50	G13		What are the potential impacts of discharge into the Russian River on water quality for customers of the Sonoma Water Agency?	TASK 32	TASK 32		In scope.
50	G14		What is meant by "listed" streams? Water quality should be characterized for each stream system, including tributaries, that could be impacted by the project regardless of whether it is named, unnamed, large or small.	TASK 21	TASK 21		Listed streams are defined in the State Water Resources Control Board's 1990 Water Quality Assessment. Water quality characterization in scope.
50	G15		What would the quality of the wastewater be as it enters irrigation streams? Flow augmentation streams?	TASKs 18 and 21	TASKs 18 and 21		Flow augmentation is no longer a study component. Potential impacts from agricultural irrigation with treated wastewater is in the scope.
50	H1		Why were Adobe, Copeland, Crane, Blucher, San Antonio, Lichau, Lynch and Tolay creeks and Willow Brook chosen for stream augmentation? What is the historic condition of these creeks? Are they degraded? Describe degradation and its causes.			X	See response to comments 43 F and 50 G1.
50	H2		Why would Green Valley/Atascadero and Walker Creek be visited only twice and the rest five times?		TASK 21		See response to 41 I.

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50	H3	Barbara Salzman, Cont'd.	Would irrigation help reduce or contribute to an increase in non-point source discharges? What guarantees would there be to ensure that overirrigation and impacts from runoff do not occur?	TASK 18	TASK 18		The project description will include irrigation operations management plans which provide the requirements necessary to minimize overirrigation and impact from runoff.
50	H4		What criteria were to be used to choose the Petaluma River sample sites? Show sampling locations on a map.			X	Petaluma River studies are optional tasks which would be needed if the Bay Board required it or contingency plans for the Petaluma River made such studies necessary.
50	H5		What final water quality is anticipated with each disposal or reuse mode? In other words, what constituents would be removed from the water by irrigation, flowing in stream, wetlands, etc.? How would this quality compare with direct treatment methods?	TASK 21	TASK 21		The characterization of reclaimed water quality in each disposal/reuse mode is in scope; water quality impacts will be assessed.
50	H6		What are the potential benefits, if any, and detriments of discharging into the Russian River? Into the Petaluma River?	TASKs 21, 32	TASKs 21, 32	X	Petaluma River discharge not proposed at this time. Assessment of impacts from discharge to Russian River is in scope.
50	I1		What are the potential impacts, if any, of discharging salts, trace metals, chlorinated hydrocarbons, pathogens, and nutrients on groundwater in the geysers or other aquifers?	TASK 22	TASK 32		In scope for Aquifer Storage and Recovery (ASR). The analysis of these impacts has been added to drinking water assessment.

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50	I2	Barbara Salzman, Cont'd.	Address the potential exposure of people or property to water related hazards, such as flooding, with each alternative, particularly reservoirs, flow augmentation and wetland storage.	TASK 39	TASK 39		The Public Health and Safety section of the EIR/EIS will provide an analysis of the potential hazards associated with each alternative such as flooding.
50	I3		Increased runoff volumes exceeding the capacity of downstream systems could occur with any alternative that has flow augmentation, irrigation or leakage from reservoirs. Potential impacts of increased runoff should be addressed for all alternatives except No Project.	TASK 18 and 21	TASK 18 and 21	X	The hydrologic scope of work will provide an analysis of the capacities of downstream systems. Flow augmentation has been eliminated as a study component.
50	J		All vegetative habitats which could be lost because of any alternative or component should be mapped. Discuss how each of these resources would be affected by project construction and/or operation. The loss of any aquatic habitat type should be considered a significant adverse impact.	TASKs 18, 19, 20, 21	TASKs 18, 19, 20, 21		Analysis of impacts on various habitats is in scope.
50	K		The environmental analysis should address potential impacts to all stream, creek and river systems, whether or not a specific amount of bank is vegetated with riparian vegetation. Show maps of all stream systems.	TASK 19	TASK 19		In scope.

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50	L	Barbara Salzman, Cont'd.	Identify and map existing wetlands by type, showing acreage also. A jurisdictional determination should also be provided for all wetlands.	TASK 18	TASK 18		The EIR/EIS will identify and map existing wetlands. A jurisdictional determination will be provided for the defined preferred project alternative in the Final EIS.
50	M		Native trees, aquatic and other habitats that would be removed or damaged by wastewater transmission and distribution lines should be described and mapped.	TASK 19	TASK 19		In scope.
50	N		Identify and show habitats that currently exist in areas proposed for creation of reuse or polishing wetlands. What species use the habitats that would be lost? Identify and evaluate the functions of habitats that would be created by proposed wetlands in comparison with what is in these locations now.	TASK 18	TASK 18	X	In scope. Wetlands creation, except for mitigation, is no longer a component of the Long-Term Project.
50	O		What are the potential impacts to streamside vegetation and wetlands along stream corridors from flow augmentation and runoff from irrigated lands? Discuss impacts to both the stream system and its individual components.	TASK 19	TASK 19	X	In scope. Flow augmentation is no longer a component of the Long-Term Project.

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50	P	Barbara Salzman, Cont'd.	What impacts would be anticipated from rapid infiltration and from direct discharge? Compare and assess the differences in impacts. Which is least environmentally damaging? What species could be affected?	TASKs 20 and 39		X	Rapid infiltration has been dropped as a component of the Long-Term Project. Species affected by direct discharge will be identified in the EIR/EIS.
50	Q		Describe historic wetland communities that existed on diked baylands along the San Pablo Bay margin.	TASK 18	TASK 18		The Bayflats (Reyes Soil) irrigation area subcomponent of the South County Alternative is part of a South County project. Historic wetlands which once existed on these diked baylands and the history of this prior conversion to agricultural use would be described in the EIR/EIS.
50	R		What are the effects of irrigation on natural native plant communities that are not special status species? What are the potential effects of converting bay plains to managed, ponded wetlands?	TASK 19	TASK 19	X	An evaluation of project impacts on native plant communities is in scope. Created wetlands are no longer a study component.
50	S		What impact would the construction and operation of project facilities have on native plant communities that are not special status?	TASK 19	TASK 19		In scope.

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50	T	Barbara Salzman, Cont'd.	How would the loss of existing habitats affect remaining habitats? Would movement corridors be blocked? Would any habitats be fragmented?	TASK 19	TASK 19		In scope.
50	U		Assess impacts of the project alternatives on non-special status wildlife species (both native and migratory). Use field data from local sources, such as the Madrone Audubon Society. What adverse impacts will occur to these species as a result of the construction and operation of project facilities? Which species would be impacted? How? How would invertebrates be affected? What bird habitat would be impacted?	TASK 19	TASK 19		EIR/EIS evaluation will be based on acres of vegetative community lost as a result of this project. The tree mapping will occur for the selected alternative in the FEIR/FEIS. Impacts to species as a result of construction and operation of project facilities will be identified.
50	U1		The value of the baylands seasonal wetlands lies not with the vegetation, but with the functions they provide for shorebirds and waterfowl of the Pacific flyway. Describe the functions the diked baylands provide and the species that depend on the shallow wetlands. How would irrigation and more intensive agricultural use of San Pablo Bay diked baylands impact seasonal use by migratory shore birds and waterfowl as well as other terrestrial species?	TASK 19	TASK 19		In scope.

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50	U2	Barbara Salzman, Cont'd.	Why are no studies of small carnivores, red-legged frogs and western pond turtles being conducted in the Santa Rosa Plain?			X	The primary component in the Santa Rosa Plain was wetland creation sites. Wetland creation has been dropped from further consideration with the exception of its use as potential mitigation.
50	U3		What wildlife movement corridors would be impacted by the Project? Identify and map the corridors.	TASK 19	TASK 19		In scope.
50	U4		What kind of consistent habitat would be provided by wetlands created for polishing or reuse? What mitigation measures are proposed to compensate for the loss of existing habitats? What loss of habitat and impacts to wildlife could occur at discharge points for flow augmentation, irrigation or river discharge?	TASK 19	TASK 19	X	Flow augmentation and "polishing" wetlands have not been retained as potential project components. Otherwise, in scope.
50	U5		It appears that no fieldwork is proposed for West County and South County resources, except on lands planned for irrigation. There may be sufficient existing work for West County, but we are not aware of any existing field studies in South County. Survey for all special status species and for migratory and resident species that depend on habitats which could be impacted. South County flow augmentation studies should concentrate on stream systems.	TASK 19	TASK 19	X	Field work for terrestrial resources and habitats potentially affected by the alternatives is in scope. Flow augmentation is no longer being considered.

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50	U6	Barbara Salzman Cont'd.	What effect would additional flows from augmentation or additional runoff from irrigation have on existing salt or brackish marshes? What studies of the Petaluma River would be undertaken? Studies should address whether impacts on the Petaluma Marsh or other salt water marshes are likely.	TASK 18	TASK 18	X	See response to comments 44 O, 50 H6 and 50 U5. Otherwise, in scope.
50	U7		Survey reservoir sites for all wildlife and plant species; identify adverse impacts on fish and wildlife. The number and species of trees and other native vegetation that would be removed should be discussed and mapped.	TASK 19, 20	TASK 19, 20		In scope.
50	U8		There are no studies listed to be conducted for proposed wetlands. All possible wetland locations in the South County and elsewhere should be mapped and described. Suitability of soils for wetland creation should be determined, and an assessment of the loss of existing habitats should be made.			X	Wetlands creation is no longer a project component.

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50	V1	Barbara Salzman, Cont'd.	Assessment of loss of or damage to trees should not merely be tied to a jurisdiction's tree ordinance. What are the protective provisions of these ordinances? Will impact assessment and mitigation then vary from jurisdiction to jurisdiction. Would impacts go unmitigated in jurisdictions without ordinances?	TASK 19	TASK 19		In scope. Loss or damage to trees will be identified as habitat loss. Special Status plant species will be evaluated.
50	V2		What is the potential for bioaccumulation of heavy metals and other wastewater constituents in plants, benthic organisms, invertebrates, fish, birds and other animals?	TASK 34	TASK 34		In scope.
50	V3		Answers to Checklist questions on Wildlife: #1, changes in species diversity; #3, deterioration of existing fish or wildlife habitat; #4, blockage or fragmentation of important wildlife migration or travel corridors should be yes not maybe.	NA	NA	NA	Comment noted.

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50	W1	Barbara Salzman, Cont'd.	What other native fish besides steelhead and coho salmon use the streams that could be impacted by the project? All fish and aquatic resources in all streams, creeks, tributaries and rivers that could be affected by the project should be addressed.	TASK 20	TASK 20		Scope includes field collection and literature review to describe species in potentially affected streams.
50	W2		The U.S. Fish and Wildlife Service (USFWS) should be involved in developing the Russian River Plan.	NA	NA	NA	U.S. Fish and Wildlife are included in all groups that we routinely consult. U.S. F.W.S. have been involved in the project Technical Review Group.
50	W3		The aquatic biology surveys do not include invertebrates. Many aquatic species depend on invertebrates and impacts on these species should be addressed.	TASKs 19 and 21	TASKs 19 and 21		Invertebrates are included in the Terrestrial Biology scope (Vernal pool crustaceans and California Freshwater shrimp surveys) and in the water quality scope (benthos).
50	W4		What criteria will be used to identify sampling stations in creeks, streams and rivers?	TASK 39	TASK 39		Criteria will be described in the draft EIR/EIS.
50	W5		Characterize fish, vertebrates, benthic organisms and invertebrates for all streams that would be impacted by each alternative.	TASK 20	TASK 20		All significant waterways will be evaluated.
50	W6		It is not sufficient to survey only during summer; surveys should take place in all seasons.	TASK 20	TASK 20		Surveys are being conducted per appropriate protocols which require studies to cover the appropriate seasons.

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50	W7	Barbara Salzman, Cont'd.	What are the effects of dams and reservoirs on instream fisheries at and above the dam sites? Would movement corridors be blocked? Would any spawning habitat be flooded or blocked? What impacts would storage reservoirs have on downstream resources?	TASK 20	TASK 20		In Scope.
50	W8		Are migratory fish the same as anadromous fish?	NA	NA	NA	The terms are used as synonyms in the scoping report.
50	W9		How could flow augmentation and irrigation runoff adversely affect water quality and/or increase flows so that they would be detrimental to fish and other instream resources?	TASKs 18, 20 & 21	TASKs 18, 20 & 21	X	Flow augmentation is no longer under consideration. Potential impacts from irrigation runoff are addressed in scope.
50	X1		What are management goals for each created wetland? For mitigation wetlands, how would continued maintenance of wildlife habitat be assured?	TASK 18	TASK 18	X	Created wands are no longer a study component. Mitigation wetlands are in scope.
50	X2		Describe the characteristics and proposed habitat for all created wetlands. How do these compare with natural wetlands, particularly those lost because of the project? Would habitat be provided for the same species that had lost habitat?	TASK 18	TASK 18	X	See 50 X1.

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50	X3	Barbara Salzman, Cont'd.	What measures would be taken to correct accumulation of heavy metals in soils and/or invertebrates in created wetlands?		TASK 18	X	See response to 50 X1.
50	X4		How much nutrient removal occurs in created wetlands?			X	See response to 50 X1.
50	X5		How would wetlands have to be managed to provide "polishing" functions? How would this affect wildlife use? Evaluate and compare habitat functions and values of wetlands lost to wetlands created for polishing or reuse functions.		TASK 18	X	Created wetlands have been eliminated from the study.
50	X6		What effects would possible use of fertilizers and chemicals used to grow irrigated crops have on wetlands near discharge points?		TASK 18	X	This comment broadens scope of comment 2Y to entire study area. Created wetlands have been eliminated.
50	X7		Regarding #13, P. 33: I believe "no net fill" should read "no net loss."		TASK 18		In scope.
50	X8		What are the impacts of dam and reservoir construction on streams, creeks, and other habitats besides wetlands?	TASKs 18, 19, 20	TASKs 18, 19, 20		In scope.
50	X9		Have the Kelly Wetlands been operating for a sufficient period of time to predict bioaccumulation potential? What other studies have been done in this area?	TASK 34			Bioaccumulation studies are in scope.

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50	X10	Barbara Salzman, Cont'd.	Will the designs for created wetlands for reuse and polishing be identical to the Kelly wetland. Are the soils the same? Would they be managed in the same way?			X	Created wetlands have been eliminated from the project.
50	X11		All wetlands, not just the most obvious or most sensitive, must be mapped and described. How is "significant" defined and who does the defining?	TASK 18	TASK 18		"Significant", in terms of impact assessment, will first be defined by all applicable federal, state and local laws, regulations and policies, then, where needed, the consultant will propose evaluation criteria with criteria of significance for consideration and adoption as policy by the City. Wetlands mapping is in scope.
50	X12		Wetlands on lands proposed for irrigation should be mapped and described to ensure they are not destroyed.	TASK 18	TASK 18		In scope.
50	X13		Characterize soils at proposed wetland sites to determine whether hydric soils needed for wetlands are present.	TASK 18		X	Created wetlands have been eliminated as a study component. This type of study would be done for mitigation wetlands.
50	X14		All areas of proposed wetlands creation should be mapped and described. The reasons for their choice should be presented.	TASK 18	TASK 18		See response to comment X 13.
50	X15		What would be the fate of constituents in runoff from the (waste) water and crops in(to) wetlands?		TASK 18		Assessment of potential impacts to wetlands from irrigation runoff is in scope.

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50	X16	Barbara Salzman, Cont'd.	Compliance with CWA 404(b)(1) guidelines requires preparation of an alternate sites analysis if non-water dependent projects are proposed in wetlands. Will an alternate site analysis be prepared for this project?	TASK 24	TASK 18		In scope.
50	X17		All loss or adverse impacts to "riparian, marsh or other wetland wildlife habitat" should be considered significant. With the loss of 90% of the state's wetlands, all wetland losses and adverse impacts are significant.	TASK 39			In scope. Once a wetland is determined to be a jurisdictional wetland, any loss is considered significant.
50	X18		Mitigation for loss of existing wetlands should be described and mapped. Mitigation wetlands should at least provide the same habitat type as that lost, be at a ratio of 2:1, be constructed before the site is lost, have a detailed monitoring and management plan and be protected in perpetuity.		TASK 18		In scope.
50	Y1		What are the potential impacts of construction of roads and other facilities on vegetative and wildlife habitats?	TASK 19	TASK 19		In scope.
50	Y2		What are the potential impacts of increased recreational uses into now remote areas?			X	Recreational uses are not in the project descriptions.

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51	A	Robert Miller, Operating Engineers Union, Local 3, Alameda (L)	It is <u>not</u> necessary to study ocean outfall, since it was already rejected.			X	Ocean outfall is no longer an alternative.
51	B		It is important to treat the following areas of study equally: financial, socio-economic, land use, environment, biological	X	X	X	All the areas of concern cited will be studied in the EIR/EIS except for social impacts.
52	A	Dean Cooley, PG&E, Healdsburg (L)	PSR cites the need to comply with Bay Area Air Quality Management District (BAAQM) rules and regulations. Since operations in and near the Sonoma Co. portion of the Geysers Geothermal area are regulated by the Northern Sonoma Co. Air Pollution Control District, we feel that the air quality task should include a review of its rules and regulations and compliance with them should be included under this task.		TASK 39		The air quality scope has been changed to include review of Northern Sonoma County APCD regulatory requirements for the Geysers discharge alternative.
52	B		PSR, Geysers discharge, under "land use": states "reservoir sites...may involve land under the Williamson Act." Elsewhere (Public Services), the PSR states that Geysers Discharge "would not require new storage facilities." It appears the Land Use response is in error and should be eliminated.	TASK 37			The issue of whether any Williamson Act land is impacted will be addressed under the current scope.

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52	C	Dean Cooley, Cont'd.	Suggest, because of potential energy generation under the Geysers alternative that energy task be rewritten to state that "net" energy impacts of alternatives will be evaluated.		TASK 39		The EIR will evaluate the net energy impact of the Geysers alternative project; i.e., the energy to be produced from the steam derived from the water delivered to the Geysers as well as the energy consumed to pump it to the Geysers.
52	D		Geology task should be expanded to include at least a literature search of reports on seismic activity in the Geysers area.	TASK 35			A literature search is included in scope for seismic activity that occurs around the geysers.
53	A	Steve Klausner, Sonoma Co. Taxpayers Association, Santa Rosa	Proposed EIR is too complicated. Too many alternatives with too many options. The EIR proposes to study the entire county. We don't see how this can be done within the estimated \$8 million budget. We cringe to think what a final project might cost.	NA	NA	NA	In order to prepare a valid, certifiable EIR/EIS, an adequate range of alternatives/components must be analyzed. The complexity has been driven, to a significant extent, by public concerns about potential environmental effects.
53	B		We ask those preparing the EIR/EIS to remember that this will be one of the country's first major wastewater disposal systems built without financial assistance from the State or Federal government. We, the ratepayers, will carry this burden. This is not the time for endless studies or to think up expensive projects.	NA	NA	NA	By looking at a range of alternatives and components, decision makers will be in a better position to weigh the environmental and economic impacts before choosing a project.

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53	C	Steve Klausner, Cont'd.	The Llano Road Treatment Plant is producing some of the cleanest wastewater in the nation. Cal. Dept. of Public Health, U.S. Environmental Protection Agency, and Cal. Dept. of Fish and Game agree that a carefully managed discharge is safe for fish, wildlife and recreational use. The Subregional System is already pursuing an aggressive reuse program, with one of the highest percentages of reuse in the state. This EIR is evaluating how to dispose of tertiary-treated wastewater during a drought. This should not be that complicated or costly a process.	NA	NA	NA	A long-range project for the disposal/reuse of Subregional System's reclaimed water is needed to comply with the RWQCB's cease-and-desist order, and to ensure a reliable disposal/reuse system under all foreseeable weather conditions. The EIR/EIS must evaluate the alternatives/components at an equal level of detail, in order to ensure an implementable project can ultimately be selected.
53	D		Economic feasibility is a critical issue that must be addressed up front throughout this process. This is not currently the case. Cost consideration is not one of the project's Overall Objectives. In fact, economic feasibility is the last of the Supporting Objectives. Evaluation of the burden on ratepayers is #31 on the list of tasks, just about the last task to be completed. This is unacceptable.	TASK 31			The evaluation of economic feasibility will be conducted throughout the project. Task 31 is a description of the task, and the order of the list does not reflect the order or importance of the studies which will be conducted.

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53	E	Steve Klausner, Cont'd.	With so many alternative plans and overlapping options, we would like to see key elements identified. Components and costs associated with meeting overall objectives, like ensuring public health and safety, should be separated from supporting objectives like reuse or conservation. Where possible, the costs of reuse should be broken down into common units of measurement like acre-feet. We want a clear understanding of what each of these objectives costs and why.	TASK 31			The economic effects will be presented in such a way as to allow the interested public to compare the costs of the various components in relation to their potential environmental effects.
53	F		For example, the Interim Master Plan includes irrigation of the Santa Rosa Country Club Golf Course and urban irrigation in Rohnert Park. Is this disposal or is it reuse? What will it cost to deliver this water? What would be an alternate source for this water? What would that cost? Will the Country Club or the municipality be paying for any part of the cost of delivering this water to them? If so, what part?	TASKs 31 and 32	TASK 33		See response to 53 E. The Irrigation Management Plan will discuss strategies for the use of reclaimed water and a related pricing policy. Urban irrigation is considered reuse. Comparison of using existing resources with the use of reclaimed water is in scope.

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53	G	Steve Klausner, Cont'd.	We ask the same questions of other options: Wetland creation, irrigation of the Bennett Valley Golf Course, South County irrigation, West County irrigation, River discharge. So many options and alternatives, but are they disposal or are they reuse? What does it cost? Who benefits? Will the users pay? How much?	TASK 33			Economic impacts are included in the scope of work. The EIR/EIS will analyze the environmental and economic impacts of the alternatives and components. The benefits and costs of many of these are in dispute. The EIR/EIS is intended to provide information to the public and BPU on the various costs and benefits of all these options, so these can be weighed before selecting an alternative to implement.
53	H		Modify the Migratory Fish Study, which needlessly harasses the small remnant steelhead run on Santa Rosa Creek. This study is far too intrusive; electro-fishing in the summer, netting them coming and going in winter. The purpose of this study is to evaluate the impact of wastewater on migratory fish during a drought. Hey, there is no water in their spawning streams during a drought! Let the poor fish be. There are so few of them, you risk studying them to death.	TASK 14			See responses to comments 11 and 12 in Table 1.
53	I		Regarding the study of the Estero Americano, the critical issue here has not been clarified. As we understand it, the real concern is the impact of fresh water on the Esteros hypo-saline condition.	TASKs 18, 20, 21	TASKs 18, 20, 21		See response to comment 2 J.

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53	J	Steve Klausner, Cont'd.	Congress specifically included the protection of this hypo-saline environment in their legislation creating the National Marine Sanctuary. This should be the primary focus of this special study. It will be challenging to find anything that can live in water that is 40 parts salt per thousand. Will NOAA assist with this study?	TASKs 18 and 20	TASKs 18 and 20		Comment noted, this will be factored into scope development. We will coordinate with NOAA as a cooperating agency.
53	J1		It appears to us that the general thrust of most of these studies seems to be to minimize the impacts of wastewater discharges on streams and wetlands. Since these discharges consist of tertiary-treated wastewater and take place primarily during drought conditions, we can't help but ask the question: Might there be some benefit in doing this?	TASKs 18, 19, 20, 21, 28, 38	TASKs 18, 19, 20, 21, 28, 38	X	The impacts, both beneficial and adverse, of discharging tertiary treated wastewater to streams and wetlands is addressed in the EIR/EIS. Flow augmentation and wetlands creation using tertiary treated wastewater, however, are no longer components of this project.
53	K		Is wetlands restoration a legitimate form of reuse? Are there any benefits to augmenting streams and wetlands during a drought? If so, what are they?	TASKs 18, 21	TASKs 18, 21	X	Created wetlands and flow augmentation have been eliminated. Discharge to the Russian River, incidental discharges from irrigation and storage reservoirs, and mitigation wetlands are in scope.
53	L		Could (wetlands restoration or streamflow augmentation) affect biological productivity? How? Why? How would this impact the migratory waterfowl of the Pacific Coast Flyway?	TASKs 19, 20	TASKs 19, 20	X	See response to 53K. Effects of project activities on biological productivity and migratory waterfowl are in scope.

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53	M	Steve Klausner, Cont'd.	Could constructed wetlands in the Laguna be managed in a way that enhances flood control as well as wildlife values?			X	Created wetlands have been eliminated as a project component. See also response to comment 3A, Table 1.
53	N		Could fresh water augmentation enhance biological productivity of the Americano and/or San Antonio estuaries? What would happen if the salt content in these estuaries was diluted to 20 parts per thousand? 16 parts per thousand?	TASKs 19, 20	TASKs 19, 20		Flow augmentation has been eliminated as a project component. Also see response to comment 2 J.
53	O		Is irrigation of riparian forests a viable option for reuse?			X	Irrigation of riparian forests was considered but has been eliminated as a study component.
53	P		EIR should evaluate a disposal system that meets all public health standards and is safe for the environment. Evaluate practical and feasible opportunities for disposal as well as reuse. Evaluate a disposal system that will be cost effective and affordable.	TASKs 32 and 33	TASKs 32 and 33		Economic, health and safety issues are included in the scope of work.
54	A	Susan Stompe, Sierra Club, Marin Group, Novato (L)	There would be a 40% increase in average flow (from 7,000 million to 9,800 million gallons.) Requests a reduced growth component be developed.			X	See response to comments 34 B, 40 A and B.
54	B		Identify the environmentally superior alternative. At least one alternative should be developed that has no impacts on wetlands.	TASK 39			In scope. See Response to 50 A3.

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54	C	Susan Stompe, Cont'd.	For each alternative show the route of all pipelines and/or other facilities necessary for transport of water for storage, reuse or discharge. There should be a thorough analysis of the potential impacts of the construction and use of these facilities along each route.	X	X		For each alternative the pipelines will be shown for transporting reclaimed water to storage, water from storage into proposed irrigation areas, and discharge points to natural water courses. The major construction features along these pipelines (such as highway, railroad, and creek crossings) will be identified. Environmental impacts along these pipeline routes will be evaluated in the EIR/EIS.
54	D		Include a map showing the location of each stream, creek or drainage and the location of the proposed storage facility. This should be in sufficient detail to allow readers to find the location, should they want to evaluate the conditions for themselves.	TASK 31	TASK 31		Drawings of each alternative will show all proposed storage reservoirs and the associated drainage courses and creeks in the vicinity. Drawings will use USGS topographic mapping product as a base, and will be readily available to the public to compare with actual field conditions.
54	E		How would overflows be handled? Is a back-up system planned? Describe the back-up system.	TASK 31	TASK 31		Overflows from the reservoirs are not expected to occur; the reservoirs will be operated to keep the high water level below the spillway crest even allowing for a peak storm runoff event. Water will be diverted to irrigation or to contingency plan components to avoid spilling from the reservoirs.
54	F		What are the reasons for locating a Russian River discharge upstream of the water district intake? What are the reasons for locating it downstream?	TASK 28 TASK 34	TASK 28		The engineering constraints and environmental effects of discharge at both locations will be evaluated, and this information will be available to those deciding where to locate the discharge.
54	G		Show the intake facilities on a map. Answer the same questions for locating the discharge downstream of the intake structure.	TASK 31			The intake wells of the SCWA will be shown on Alternative No. 5 drawings.

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54	H	Susan Stompe, Cont'd.	Describe existing conditions, including soil type, suitability for growing crops, existing habitats such as wetlands, and other possible constraining conditions, for all lands proposed for irrigation. Show these lands on a figure with enough information to enable the public to locate the sites. Are all soils suitable for growing an irrigation crop? Which ones are not or are questionable? What would assure an adequate amount of irrigable lands would continue to be available in the long term?	TASK 18			See responses to comments 21 and 2S.
54	I1		Include a map showing the location of each stream, creek or drainage and the location of the proposed storage. This should be in sufficient detail to allow readers to find the location, should they want to evaluate the conditions for themselves.	TASK 31	TASK 31		See response to 54 D.
54	I2		Describe the existing conditions of each stream or creek along which a reservoir or other storage facility is proposed. A description of the riparian vegetation, water quality, habitat functions, wildlife use, endangered and other special status species, groundwater recharge, fish and other beneficial uses for each creek.	TASKs 19 and 20	TASKs 19 and 20		In scope.

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