

May 5, 2009

Mr. David Cuneo, Senior Environmental Specialist
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95403

Dear Mr. Cuneo:

This letter comments on the significant additions to sections of the NSCARP Final EIR pertaining to energy consumption and operations-related GHG Emissions as well as on missing elements of the Project Description.

Impact AQ-14, Operational Emissions Contributing to Global Warming, is entirely new in the FEIR and did not exist in the Draft. It includes significant new information regarding a significant environmental impact which has been added to the FEIR. As such, under CEQA, its inclusion requires that the FEIR be renoticed and recirculated respecting this issue.

Power consumption calculations for reservoir filling and distribution are shown in Tables 3.15-3 and 3.15-4. These figures are used to calculate power consumption (Table 3.15-5) and annual operational GHG emissions (Appendix E, Air Quality).

None of these figures include the energy requirements or GHG emissions required to move billions of gallons of wastewater each year from the Laguna treatment plant to northern Sonoma County. The distance from the Laguna plant to Alexander Valley is 31.4 miles, according to Santa Rosa's Geysers Project Fact Sheet (<http://ci.santa-rosa.ca.us/DEPARTMENTS/UTILITIES/IRWP/GEYSERS/Pages/FactStat.aspx>).

Including the effects of this long-distance conveyance would significantly increase all of the figures shown in Section 3.15 and would affect the impact conclusion for AQ-14 and perhaps also UTL-7. This is a serious inadequacy in the FEIR, as both the power consumption and GHG emissions for the project are dramatically understated.

I also take issue with the conclusion in Impact AQ-14 that the environmental impact will be less than significant. The argument presented to support this conclusion defies logic:

Although annual operating GHG emissions of 7,750 MTCO₂e/year for Alternative 2 “exceed the 7,000 MTCO₂e/year recommended threshold of significance provided in the Preliminary Draft Staff Proposal created by CARB, this threshold is merely a suggestion and has not been approved. Therefore, at this point in time, it would be speculative to determine if emissions associated with the proposed project would or would not contribute significantly to global warming.”

Given Sonoma County's stated objective to reduce its GHG emissions and the Water Agency's stated objective to operate a carbon-free water system, it seems more

appropriate to utilize the CARB draft threshold as the best currently available threshold of significance criterion.

Note also that the language in this paragraph on page 3.3-27 erroneously refers to construction emissions even though this Impact is a discussion of operational emissions.

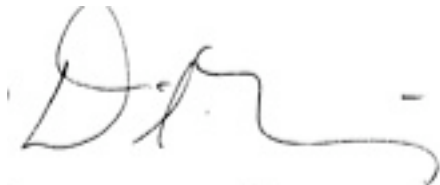
Furthermore, implementation of Santa Rosa's Geysers Expansion Project (described in the Discharge Compliance Project EIR) fully utilizes available pumping capacity for the Geysers Pipeline. This is confirmed in personal correspondence with Santa Rosa's consultant, Dr. Dave Smith, who writes: "You are correct that all of the existing pumping capacity from the treatment plant to Bear Cyn pump station is needed to meet the City's obligation under the Geysers Expansion Project. This capacity is nominally 20 mgd."

Redeployment of wastewater currently used for river discharge or irrigation near the Laguna plant to NSCARP would require construction of new pumping stations for the Geysers Pipeline itself. The same holds true for wastewater from the Windsor or ALWSZ plants. These additional pumping stations should be included in the Project Description and cost estimates for NSCARP.

It also appears that while Windsor and ALWSZ treatment plants are listed as potential suppliers of wastewater for NSCARP, neither facility is currently connected to the Geysers Pipeline. Neither the Project Description nor the cost estimates include any mention of these components.

In conclusion, the Project Description and impact conclusions related to GHG emissions and power consumption have very significant flaws and omissions. New Impact AQ-14 requires the renoticing and recirculation of the FEIR so that relevant agencies and the public have the opportunity to comment on this new information.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Ring", with a long horizontal flourish extending to the right.

David Ring
Vice-Chair, Clean Water Coalition of Northern Sonoma County