

CPUC PUBLIC MEETING COMMENT SHEET

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[Begin HH1]

Comment: It seems to me that the subject of seismic activity (in general) has not been properly addressed nor accurately portrayed of any time during development and operation of the Lake County Sonoma County development. I see this point as being again "glossed over" as a "minor" negative effect that in the total picture is not of significant impact. If this problem is not realistically dealt with now (as an item of the revue for sale of the existing plant) then when will it be addressed? I would like to see CPUC condition sale of this geothermal plant by a fuller (and more accurate) disclosure of seismic activity.

[End HH1]

## HH. BILL REED

HH1 It could be argued that the issue of seismicity is addressed in the DEIR in greater detail than is warranted. There are numerous provisions in the California Environmental Quality Act (CEQA) that limit the amount of detail presented in an EIR (see, for example, Sections 15126[a], 15141, 15143, 15146, and 15147 of the CEQA Guidelines). In general, the information and analysis presented in an EIR should focus on the significant effects on the environment that would occur if the proposed project were implemented, and the depth of discussion should be in proportion to the severity and probability of occurrence of such effects. Effects that can be determined to be clearly insignificant and unlikely to occur can be dismissed from any extensive discussion in the EIR. In the case of seismic effects of the proposed project in the Geysers geothermal area, as noted in Section 4.3 of the DEIR, the proposed divestiture would not affect the ability to provide additional water to the Geysers steam fields, and therefore, the project would not alter the microseismicity effects in the area. Nonetheless, a detailed discussion of microseismicity in the area is provided in the discussion, and the results of earlier studies on the issue are summarized. The DEIR discussion acknowledges that water injection into the Geysers can result in increased microearthquakes. An Environmental Impact Report/Environmental Impact Statement (EIR/EIS) was prepared for the diversion of wastewater effluent from the Lake County Sanitation District's Southeast Regional Wastewater Treatment Plant to the Geysers and the injection of this effluent back into the steam fields to boost steam production. That EIR/EIS appropriately examined in detail the potential effects of that project on microseismicity in the area and concluded that the likely increase in microseismicity would not pose a public safety hazard or contribute significant to property damage, and would therefore be a less-than-significant impact. An EIR was also prepared for the proposed Santa Rosa Wastewater Modified Geysers Recharge Project, involving conveyance of up to 11 million gallons per day of wastewater from the City of Santa Rosa for injection in the Geysers steam fields. That EIR concluded that the wastewater injection project could result in an additional 140 annual microearthquakes. The proposed divestiture, however, would not have the potential to increase microseismicity or any other seismic impacts, and thus the level of detail presented in the DEIR on this issue is sufficient at the least.