

**COMMENT LETTER 14 - SONOMA COUNTY WATER AGENCY, JIM FLUGUM, PE  
(OCTOBER 7, 1996), RECEIVED OCTOBER 7, 1996**

**Response to Comment 14-1**

*Comment Summary: The comment describes general concerns about Alternative 5A impacts on pathogens in the Sonoma County drinking water supply.*

These concerns are described in more detail in subsequent comments. Refer to Responses to Comments 14-2 through 14-8. Also, refer to Master Response 8, located in Section 6.2 of this document, concerning pathogens in reclaimed water.

**Response to Comment 14-2**

*Comment Summary: The comment states that *Cryptosporidium* and *Giardia* in effluent from the full range of treatment plant operating conditions should be evaluated.*

Appendix H-3 (Reclaimed Water Quality Update) of the Draft EIR/EIS details the level of *Cryptosporidium* and *Giardia* in effluent from the full range of treatment plant operating conditions. These data are addressed in Master Response 8, located in Section 6.2 of this document.

**Response to Comment 14-3**

*Comment Summary: The comment states that the effectiveness of the treatment process for *Cryptosporidium* removal is not evaluated for Alternative 5A.*

*Cryptosporidium* was found in effluent and was not evaluated in the biological hazard assessment within Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water). However, the data has subsequently been analyzed and the results are presented in Master Response 8, located in Section 6.2 of this document.

**Response to Comment 14-4**

*Comment Summary: The comment states that the effect of conversion to ultra-violet disinfection on *Cryptosporidium* and *Giardia* should be evaluated.*

The ultra-violet conversion project was not addressed in the Draft EIR/EIS because the City of Santa Rosa had not decided to implement the conversion prior to issuance of the Draft EIR/EIS. Since then, however, the City has committed to the ultra-violet conversion project and has described potential impacts in a separate CEQA document (*Initial Study and Negative Declaration for Conversion to Ultra-Violet Disinfection* (February, 1997)). No significant impacts were identified; this is described in greater detail in Master Response 8, located in Section 6.2 of this document.

## **Response to Comment 14-5**

*Comment Summary: The comment states that reclaimed water discharge above the Ranney Collectors (Alternative 5A) could result in imposition of additional treatment requirements on Sonoma County Water Agency under the existing Surface Water Treatment Rule.*

Under the Surface Water Treatment Rule, additional filtration and disinfection, additional disinfection only, or no additional treatment could be required of Sonoma County Water Agency if Alternative 5A is implemented, depending on the impact of the Alternative on water quality. This is further described in Master Response 8, located in Section 6.2 of this document.

## **Response to Comment 14-6**

*Comment Summary: The comment states that reclaimed water discharge above the Ranney Collectors (Alternative 5A) could result in imposition of additional treatment requirements on Sonoma County Water Agency under anticipated new regulations (i.e., the Groundwater Disinfection Rule). The comment further states that additional treatment would be extremely costly for the Agency to implement.*

EPA's Proposed Enhanced Surface Water Treatment Rule states that a Groundwater Disinfection Rule is being developed, but no Proposed Groundwater Disinfection Rule has been published. Therefore project impacts cannot be evaluated relative to a Groundwater Disinfection Rule. The Proposed Enhanced Surface Water Treatment Rule suggests that additional filtration and disinfection, additional disinfection only, or no additional treatment could be required of Sonoma County Water Agency if Alternative 5A is implemented, depending on the impact of the Alternative on water quality. This anticipated regulation is further described in Master Response 8, located in Section 6.2 of this document.

## **Response to Comment 14-7**

*Comment Summary: The comment states that using coliform bacteria as the sole basis for evaluating the significance of human health risk from pathogens in reclaimed water is too limiting and narrow. The comment suggests that an evaluation criteria be added to evaluate for "regulatory requirements for greater treatment at any downstream domestic water intake."*

As described on page 4.7-23 of the Draft EIR/EIS, *Giardia* and coliform bacteria were considered as a basis for evaluating impact significance. As described in Master Response 8, located in Section 6.2 of this document, the basis for evaluating impact significance has been expanded to include *Cryptosporidium*.

## **Response to Comment 14-8**

*Comment Summary: The comment states that implementation of Alternative 5A would “eliminate the mitigating effects of the existing discharge configuration” which separates reclaimed water from the Russian River reach from which Sonoma County Water Agency withdraws its drinking water supply, and that implementation of Alternative 5A “would benefit no one in terms of public health and safety.”*

Refer to Response to Comment 10-3 and to Master Response 8, which is located in Section 6.2 of this document.

