

COMMENT LETTER 18 - NORTH MARIN WATER DISTRICT, JOHN BAKER (SEPTEMBER 27, 1996), RECEIVED OCTOBER 7, 1996

Response to Comment 18-1

Comment Summary: The comment states that the North Marin Water District has reviewed the Draft EIR/EIS and also had participated in the 1995 roundtable meetings. At the roundtables and in a December 6, 1995 letter, the North Marin Water District expressed concern regarding Alternative 5A and the discharge of treated wastewater upstream from the Sonoma County Water Agency's collector facilities.

Specific concerns about Alternative 5A are contained in subsequent comments in the letter and are addressed in Responses to Comments 18-2 and 18-3, and in Master Response 8, located in Section 6.2 of this document.

Response to Comment 18-2

Comment Summary: The comment states that Alternative 5A may trigger a Department of Health Services requirement for full filtration of water diverted by the SCWA.

The EIR/EIS authors do not agree that the discharge of reclaimed water would trigger the filtration requirement of the Surface Water Treatment Rule based on our findings presented in Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water) of the Draft EIR/EIS (and references therein, which are available at the Laguna Library). Refer to Response to Comments 10-2 and 10-5, and to Master Response 8, located in Section 6.2 of this document.

Response to Comment 18-3

Comment Summary: The comment states that if Alternative 5A is chosen and constructed, Santa Rosa and its subregional wastewater partners should foot the bill if additional water treatment is required.

The Draft EIR/EIS has not identified any impacts that would require additional treatment. Please refer to Master Response 8, located in Section 6.2 of this document, and to Response to Comment 18-2.

Response to Comment 18-4

Comment Summary: The comment states that Alternative 5A is not consistent with the second overall project objective and the second and fifth supporting objectives listed on page 1-3 of the Draft EIR/EIS.

The EIR/EIS authors do not agree with the conclusions of this comment based on our findings presented in Sections 4.6 and 4.7 of the Draft EIR/EIS. Each objective mentioned in the comment is discussed below.

The second overall project objective is to “Develop and operate the wastewater treatment and disposal system in ways that protect public health and safety and promote wise use of water resources.” The Draft EIR/EIS has evaluated discharge to the Russian River and in Section 4.7 concluded that “Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources and would not adversely affect human health via other potential exposure pathways” (see page 4.7-61). This is based on the conclusions of the Human Health Risk Assessment, which is presented in Appendix J-3 of the Draft EIR/EIS.

The second supporting objective is that “Reclaimed water that is not reused will be recycled or disposed of in a manner that protects beneficial uses of receiving waters”. As discussed above, discharge is not expected to adversely affect drinking water sources. Section 4.6 found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (see page 4.6-150). However, with implementation of cumulative projects to reduce nutrient inputs to the Laguna, and with mitigation proposed for project impacts, analysis concluded that 20% design discharge to the Laguna could be implemented without significant water quality impacts.

The fifth supporting objective is to “Satisfy applicable regulatory agency and institutional guidelines and requirements”. The City of Santa Rosa has worked with the North Coast Regional Water Quality Control Board and Department of Health Services to ensure that environmental review for the project meets their requirements for determining whether additional discharge can be permitted. The City will work with both agencies to determine their permitting requirements for whatever project alternative is selected.

This comment also expresses a position of the North Marin Water District on Alternative 5A. Please refer to Master Response 2, located in Section 6.2 of this document, regarding opinions about project selection.

Response to Comment 18-5

Comment Summary: The comment states that the statement on page 3-12 of Appendix J-3, that implementation of Alternative 5A would not lead to a requirement for additional treatment, is not substantiated.

Page 3-12 in Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water) of the Draft EIR/EIS cites and relies upon CH2M Hill (1996) as the basis for this conclusion. That citation is to a memorandum describing the professional opinion of an engineering firm that evaluated the Sonoma County Water Agency intakes and was instrumental in working with the California Department of Health Services to establish the “not under the influence of surface water” rating. The cited memorandum has been available in the project library at the Laguna treatment plant. The potential impact of Alternative 5A on the regulatory status of SCWA intakes is addressed in Master Response 8, located in Section 6.2 of this document.

Response to Comment 18-6

Comment Summary: The comment states that Appendix J-3 concludes that “the most likely pathway for contact with micro-organisms is through direct ingestion of drinking water by the SCWA collectors.”

The last line on page 3-16 in Appendix J-3 states that “the exposure pathway that presents the greatest risk of disease is from use of treated effluent for potable water without further treatment or dilution.” Appendix J-3 does not identify the most likely pathway of exposure. Master Response 8, located in Section 6.2 of this document, provides additional information on potential impacts of pathogens on human health.

Response to Comment 18-7

Comment Summary: The comment states that Giardia and Cryptosporidium were found in reclaimed water and, since the Draft EIR/EIS states one Cryptosporidium oocyst is sufficient to cause disease and that the risk from direct ingestion of reclaimed water cannot be quantified, the conclusion in Appendix J-3 that implementation of Alternative 5A would not necessitate additional treatment to comply with the Surface Water Treatment Rule is not understood.

The Surface Water Treatment Rule establishes a 3-log *Giardia* drinking water treatment requirement for surface waters and does not regulate *Cryptosporidium*. Page 3-13 in Appendix J-3 discusses the determination by the California Department of Health Services that the Sonoma County Water Agency (SCWA) intakes are not under the influence of surface water. They are not under the influence of surface water because of the filtration that is provided by the gravel. The statement in Appendix J-3 that the risk from direct ingestion (drinking) of reclaimed water cannot be quantified is unrelated to, and not a basis for conclusions regarding project impacts on treatment requirements that may be imposed on SCWA. Master Response 8, located in Section 6.2, of this document, further addresses potential impacts of pathogens on human health.

Response to Comment 18-8

Comment Summary: The comment requests that the Department of Health Services make a conclusive determination and proclamation on any necessary treatment prior to any consideration of Alternative 5A.

The Department of Health Services has commented on the Draft EIR/EIS, and responses to their comments have been provided. Refer to the Responses to Comment Letter 10. Any project that would include increased discharge would be subject to conditions imposed by both the Department of Health Services and the Regional Water Quality Control Board.

Response to Comment 18-9

Comment Summary: The comment consists of a copy of a December 6, 1995 letter from the North Marin Water District to the City of Santa Rosa, used as an attachment to Comment Letter 18 and referred to in Comment 18-3. The attachment reiterates concerns expressed in comments 18-2 and 18-3.

Refer to Responses to Comments 18-2 and 18-3.

Response to Comment 18-10

Comment Summary: The comment is an attachment to Comment 18-9, consisting of 1987 Sonoma County Water Agency comments on the Draft EIR for the Long-Range Wastewater Management Plan of the City of Santa Rosa. The comments pertain to an alternative previously considered in an EIR prepared by the City in 1986. The comment includes an extensive analysis of wastewater concentrations in the Russian River. The comments also express similar concerns to those expressed in comments 18-2 and 18-3 regarding concentrations of wastewater in the river and potential additional water treatment that might be required. Concern about the ability to meet drinking water standards is expressed.

The 1986 alternative proposed indirect discharge to the Russian River at a rapid infiltration site west of Windsor. This alternative has some similarities to the current Alternative 5A, but there are also notable differences. Because the system did not include a conservation element, treatment plant capacity in the 1986 alternative was proposed to be 25 million gallons per day (mgd), about 20 percent larger than the current Project Alternatives, which have a capacity of 21 mgd. The analysis of concentrations of reclaimed water presented in the attachment is thus no longer valid, because the water balance for the current Project is substantially different from the 1986 project. Refer to Responses to Comments 18-2 and 18-3, which address additional water treatment issues in regard to the current Project Alternatives. A human health risk assessment has been conducted, and as stated on page 4.7-61 in Appendix J-3 of the Draft EIR/EIS, "Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources". The current analysis addresses drinking water standards that, at the time of the 1986 EIR, were considered future regulations (e.g. 1986 Safe Drinking Water Act Amendments). Also refer to Response to Comment 10-5, which addresses compliance with future drinking water regulations.

Response to Comment 18-11

Comment Summary: The comment is an attachment to Comment 18-9, consisting of a February 5, 1987 letter from the North Marin Water District to the City of Santa Rosa about the Draft EIR for the Long-Range Wastewater Management Plan of the City of Santa Rosa. These comments also pertain to an alternative previously considered in an EIR prepared by the City in 1986. The comments express similar concerns to those expressed in comments 18-2 and 18-3 regarding concentrations of wastewater in the river and potential additional water treatment that might be required. The comments also criticize the 1986 EIR's conclusions regarding public acceptability of the alternative.

Refer to Responses to Comments 18-2 and 18-3 regarding additional water treatment issues. The comment regarding public acceptability presented in the 1986 EIR is not relevant to the current EIR/EIS which does not present any conclusions about acceptability of Project Alternatives.

