

**COMMENT LETTER 74 - MARIE AND HAROLD OLSON (SEPTEMBER 25, 1996),  
RECEIVED OCTOBER 3, 1996**

**Response to Comment 74-1**

*Comment Summary: The comment states that no study was done to show the effect that nitrogen would have on algae and the hyacinth-like plants mushrooming in the River.*

The impact of inorganic nitrogen on attached and planktonic algae in the Laguna and the Russian River was the subject of an extensive water quality impact modeling effort, as described on page 25 of Appendix I-16 (Water Quality Impact Analysis Report) and in Appendix I-8 (Russian River Water Quality Model) of the Draft EIR/EIS. The “hyacinth-like” plant present in the lower Russian River is water primrose (*Ludwigia peploides*). The impact of reclaimed water nitrogen on this type of plant was not evaluated directly. The estimated impact on attached and planktonic algae provide an index of the biostimulatory potential of reclaimed water on aquatic plants in general.

**Response to Comment 74-2**

*Comment Summary: The comment states that the Project would increase plant growth in the River and create conditions similar to those in Clear Lake and Klamath Lake.*

The estimated impact of Alternative 5B on algae is described in Figures 4-13 and 4-14 in Appendix I-17 (Water Quality Impact Analysis Report - Vol. II Figures) of the Draft EIR/EIS. Algal biomass is controlled in river systems by nutrients, substrate for algal attachment, grazing and sunlight. Rivers generally do not accumulate high planktonic algal biomass such as that which occurs naturally in Clear Lake and Klamath Lake because the flowing water flushes algae from the river faster than growth occurs. Lakes can accumulate high algal biomass because this flushing phenomenon is absent.

**Response to Comment 74-3**

*Comment Summary: The comment states that Alternative 3 should be discarded because of impacts to the esteros.*

Refer to Response to Comment 5-9.

**Response to Comment 74-4**

*Comment Summary: The comment states that adverse impacts to the Laguna or Russian River associated with 20% design discharge are unacceptable.*

If Alternative 5A or 5B is selected the City will have to make findings of overriding considerations to explain why the alternative was selected despite the identified impacts. These findings will have to weigh the benefits of the Project against the unavoidable environmental effects, and state the reasons for any action. Although the Draft EIR/EIS

found significant unavoidable impacts to conductivity, dissolved oxygen, and biostimulatory substances in the Russian River (see page 4.6-150), the analysis concluded that with implementation of cumulative projects to reduce nutrient inputs to the Laguna, and with mitigation proposed for Project impacts, 20% design discharge to the Laguna could be implemented without significant water quality impacts.

#### **Response to Comment 74-5**

*Comment Summary: The comment states that alternatives that affect wells used by other cities are unethical and unacceptable.*

The analysis presented in Section 4.5 did not identify any impacts to municipal wells. All affected wells are individual water supply wells. The Draft EIR/EIS does not make findings about acceptability of impacts, but simply reports impacts and recommends mitigation. Mitigation is proposed for the impacts to wells. Refer to Measure 2.3.12: Provide Replacement Water Supply for Affected Wells, on page 2-85 of the Draft EIR/EIS.

#### **Response to Comment 74-6**

*Comment Summary: The comment expresses the opinion that the Army Corps of Engineers over sized alternatives.*

Components of alternatives were sized based on Wastewater Flow Projections, which are presented in Appendix D-4, and the Water Balance Model, which is presented in Appendix D-8. Alternatives were developed by the City of Santa Rosa and its consultants, not by the Army Corps of Engineers. Components are sized conservatively, to ensure that environmental impacts are assessed thoroughly, even if a larger facility is not later determined to be needed. However, the EIR/EIS authors conclude that facilities are sized accurately for a planning level analysis.

#### **Response to Comment 74-7**

*Comment Summary: The comment states that if a spill were to occur again another solution to wastewater problems would be needed, and reiterates the contention that alternatives are over built.*

The purpose of the Project is to avoid future discharges in excess of permit limits by developing a system that will operate reliably under projected weather conditions. The comment does not provide any specific reasons for the contention that alternatives are over built, so no further response is possible.

#### **Response to Comment 74-8**

*Comment Summary: The comment asks what the state water agency would do in the event of a spill.*

The North Coast Regional Water Quality Control Board is responsible for enforcement of the City of Santa Rosa's discharge permit. The Board would decide on appropriate action in the event of a spill.

#### **Response to Comment 74-9**

*Comment Summary: The comment states that a spill would have significant impact.*

The Draft EIR/EIS authors agree that an unauthorized discharge, especially a large one, could have a significant effect. The purpose of the Project is to prevent such occurrences.

#### **Response to Comment 74-10**

*Comment Summary: The comment expresses the concern that effects on residents who swim in the Russian River were not addressed.*

Exposure to reclaimed water through swimming and other recreational uses was included in the Human Health Risk Assessment, which is contained in Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water), of the Draft EIR/EIS. The results of the risk assessment are summarized in Section 4.7, Public Health and Safety, of the Draft EIR/EIS. All of the results are pertinent to potential exposure to reclaimed water through swimming.

#### **Response to Comment 74-11**

*Comment Summary: The comment states that Project impacts on Russian River tourism were not addressed.*

Refer to Master Response 7, located in Section 6.2 of this document, regarding tourism. Refer to Response to Comment 74-10 regarding health impacts to river residents.

#### **Response to Comment 74-12**

*Comment Summary: The comment refers to Brenda Adelman's comments regarding coliform and pathogens.*

Responses to Brenda Adelman's comments are presented in Responses to Comments 85-1 through 85-540. The quote in the comment from the Health Risk Assessment is correct, but does not imply any choice of alternatives.

#### **Response to Comment 74-13**

*Comment Summary: The comment expresses a preference for no risk as opposed to low risk.*

Although the reclamation system is operated to meet all Department of Health Services requirements, it is not possible to provide assurance of no risk.

## **Response to Comment 74-14**

*Comment Summary: The comment refers to Brenda Adelman's comments on Cryptosporidiosis.*

Responses to Brenda Adelman's comments are presented in Responses to Comments 85-1 through 85-540. Also, refer to Master Response 8, located in Section 6.2 of this document, regarding *Cryptosporidium*.

## **Response to Comment 74-15**

*Comment Summary: The comment expresses concern about the conclusion of the Human Health Risk Assessment and states the opinion that additional discharge would foul the Russian River.*

Extensive evaluation of water quality, health risk and effects on aquatic biota is contained in Sections 4.6, 4.7, and 4.9 of the Draft EIR/EIS. 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). The conclusions of these analyses will be weighed by decision makers in selecting a Project from among the alternatives that are evaluated in the Draft EIR/EIS. Monitoring will be a requirement for any discharge.

## **Response to Comment 74-16**

*Comment Summary: The comment refers to uncertainties in the Human Health Risk Assessment and asks if decisions can be based on uncertainty.*

Section 15144 of CEQA acknowledges that preparation of environmental documents involves some degree of uncertainty: "Drafting an EIR or preparing a Negative Declaration necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." Acknowledgment of uncertainty is part of this process of disclosure.

## **Response to Comment 74-17**

*Comment Summary: The comment expresses concern that residents who make recreational use of the Russian River were not considered in the evaluation of impacts.*

The quote from the Draft EIR/EIS is correct that evaluation of impacts was qualitative rather than quantitative, but the quote is incomplete. The section continues to state "This approach was taken because the potential uptake of chemicals or microorganisms from exposure during recreational use of the Russian River or Laguna de Santa Rosa would be much smaller than potential uptake via exposure to reclaimed water in a domestic use scenario, which includes ingestion, inhalation and dermal contact, and from eating fish.

Chemicals that do not present an adverse health risk via the domestic use or fish consumption pathways will not present an adverse health risk to persons swimming or wading in the River."

#### **Response to Comment 74-18**

*Comment Summary: The comment quotes a passage from Section 4.7, and asks how nitrogen will affect plants in the Russian River.*

The quoted passage in the comment is from the Public Health and Safety section and relates the concentration of nitrate and nitrite in reclaimed water to drinking water standards. Drinking water standards are established to protect public health, not to protect aquatic life from toxicity or biostimulation. Refer to Response to Comment 74-1.

#### **Response to Comment 74-19**

*Comment Summary: The comment states that algae and hyacinth abundance has increased and questions if the City of Santa Rosa can afford to clear the algae and hyacinth from the River at Jenner.*

Algae and water primrose are present in the Russian River. The effect of Project alternatives on the aquatic plants is evaluated in the Draft EIR/EIS, as described in Response to Comment 74-1. The comment seems to suggest that removing the aquatic plants may be appropriate mitigation, but may not be economically feasible. Removal of aquatic plants that have grown in the River as a result of the Project was not considered as mitigation; instead minimizing the discharge impact on aquatic plants was the basis for the selected mitigation. See Mitigation Measure 2.5.4: Discharge Operations on page 2-127 of the Draft EIR/EIS for a description of the mitigation.

#### **Response to Comment 74-20**

*Comment Summary: The comment refers to previous comment 74-17.*

Refer to Response to Comment 74-17.

#### **Response to Comment 74-21**

*Comment Summary: The comment disagrees with the approach of comparing impacts of discharge with existing conditions, and refers to Brenda Adelman's comments on coliforms.*

The purpose of the Draft EIR/EIS is to compare Project impacts to existing conditions. Thus, the comparison of coliform levels in reclaimed water to levels in the Russian River is pertinent. The Project cannot increase coliform levels in the river if levels in the river are higher than in the reclaimed water. Responses to Brenda Adelman's comments are presented in Responses to Comments 85-1 through 85-540.

## **Response to Comment 74-22**

*Comment Summary: The comment states that smaller dams should be studied.*

Refer to Master Response 14, located in Section 6.2 of this document, regarding small reservoirs.

## **Response to Comment 74-23**

*Comment Summary: The comment states that the admonition by the Public Hearing Moderator that individuals not repeat points made earlier does not take into account the differing reasons for holding those opinions.*

The Public Hearing Moderator's request was not intended to prohibit public discourse, but rather to minimize repetition in testimony so as to allow ample time for all commentators to present their specific concerns. Every member of the public was entitled to submit written comments on the Draft EIR/EIS, and responses to these comments provided in this Final EIR.

## **Response to Comment 74-24**

*Comment Summary: The comment states that federal law mandates that all citizens have the right to express their opinions on the Draft EIR/EIS.*

The Draft EIR/EIS was publicly circulated for 65 days and a public hearing on the document was held on September 24, 1996. In addition, the Draft EIR/EIS was introduced to the Board of Public Utilities on August 8, 1996, early in the public review period. This latter meeting was not intended to allow for public comment on the Draft EIR/EIS, but did allow an opportunity for clarification of analyses provided in the document. In addition to the public hearing, held on 24 September 1996, written comments were accepted until 7 October 1996. The public has therefore had sufficient opportunity to comment on the analyses provided in the Draft EIR/EIS.

## **Response to Comment 74-25.**

*Comment Summary: The comment urges consideration of a small, phased dam alternative.*

Refer to Master Response 14 regarding phasing and small reservoirs, located in Section 6.2 of this document.