

COMMENT LETTER 82 - MARTA WILLIAMS (OCTOBER 1, 1996), RECEIVED OCTOBER 4, 1996

Response to Comment 82-1

Comment Summary: The comment expresses concern regarding potential magnification of noise impacts due to the acoustics of the valley in the Graton area.

Depending on the location of the pump station's opening facing and the sensitive receptors, there could be some increase in noise level due to reflection. Because detailed design information is not available at this time, it is not possible to precisely assess the reflective noise. However, since the analysis used conservative calculations, such as excluding the effect of atmospheric absorption and barriers, the net effect is not expected to be significant.

The following change is made to the Draft EIR/EIS:

Page 2-93. Insert the following paragraph after the last paragraph:

For pump stations located in the Graton area, ambient noise measurement and noise reflection tests shall be conducted during the design stage to determine the reflective characteristics between the proposed pump stations and sensitive receptors as well as the nighttime ambient noise level in the area.

Response to Comment 82-2

Comment Summary: The comment states that over a period of four years four samples were collected from the treatment plant and analyzed for Giardia, Cryptosporidium, Legionella and Salmonella. The comment also states that sampling for E. coli was erratic, and that taking only one sample at Delta pond is not adequate.

Coliform is sampled daily at the Laguna Treatment Plant. Appendix H-2 (Reclaimed Water Quality) reports four samples that were analyzed for *Giardia*, *Cryptosporidium*, *Legionella* and *Salmonella*. Appendix H-3 (Reclaimed Water Quality Update) reports on numerous subsequent analyses for *Giardia* and *Cryptosporidium*. More coliform samples were not collected in storage ponds because such data were inappropriate to use for impacts analysis. Refer to Response to Comment 9-20 for an explanation as to why the analysis of impacts is based on plant effluent (not storage pond) data.

Response to Comment 82-3

Comment Summary: This comment states that the results for coliform bacteria in Delta pond were 100 times the allowable maximum and out of compliance with Title 23 water quality regulations.

Refer to Response to Comment 113-5.

Response to Comment 82-4

Comment Summary: The comment states that no studies have been performed to analyze the health impacts from the use of reclaimed water for irrigation.

Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water) of the Draft EIR/EIS recognizes that exposures via the inhalation (aerosol) pathway may occur and discusses the possible effects that this pathway would have on estimates of risk (i.e., the infectious dose by inhalation may be lower than the infectious dose by ingestion for some organisms). For potential exposures to irrigation water the possible increased risk of infection resulting from a lower infectious dose via inhalation would be countered by the reduced exposure times, lower water ingestion/inhalation rates, and smaller exposure frequencies of the irrigation aerosol pathway as compared to the domestic use scenario, the quantified exposure scenario. Compliance with current and proposed State regulations as described in Section 4.7 of the Draft EIR/EIS would further reduce the potential for exposure. The risk assessment concludes that irrigation would not present an adverse health risk.

Response to Comment 82-5

Comment Summary: The comment is concerned about potential impacts of agricultural irrigation on groundwater quality in Graton.

Agricultural irrigation in the Sebastopol agricultural irrigation area could have groundwater quality impacts; however, the Draft EIR/EIS concluded that these impacts were less than significant. Potential impacts are discussed in the Draft EIR/EIS on page 4.5-52. Impacts to groundwater in the Atascadero Creek area are specifically addressed on pages 4-13 and 5-17 of Appendix H-1 (Hydrogeology of Storage/Reuse Areas of Evaluation of Potential Impacts to Groundwater) in the Draft EIR/EIS.

Response to Comment 82-6

Comment Summary: The comment states that “the practice of subsidizing landowners who use wastewater for irrigation can only lead to over-irrigation with wastewater.” The comment also asserts that excessive salts are not appearing in current irrigation fields because the salts are washed into surface and groundwater due to excessive irrigation.

The EIR/EIS authors do not agree that subsidized irrigation necessarily leads to over-irrigation. Measures 2.2.1 and 2.2.3 on pages 2-21 and 2-23 have been included in the Project to avoid this problem. In addition, the City does not propose to pay new irrigators to use reclaimed water. The effect of the existing irrigation system on salts has not been evaluated because it is not part of the Project being evaluated in this Draft EIR/EIS.

Response to Comment 82-7

Comment Summary: The comment states that excessive agricultural irrigation will result in runoff to and contamination of the Atascadero Creek ecosystem.

Excessive runoff would result in the contamination of the Atascadero Creek ecosystem. However, mitigation measures have been developed which would preclude excessive runoff associated with agricultural irrigation. Implementation of Measure 2.2.2: Restrict Surface and Subsurface Irrigation Water Runoff (pages 2-23 through 2-25, of the Draft EIR/EIS) requires that lands irrigated with reclaimed water be managed such that surface runoff of reclaimed water to adjacent waterways does not occur. This will be accomplished by following the Best Management Practices presented on pages 2-23 and 2-24 of the Draft EIR/EIS. The City will continuously monitor and record the volume of water delivered to each reclaimed water user and calculate the application rate to ensure that the listed Best Management Practices are successful in restricting surface runoff and subsurface flow, as stated in the performance criteria. The comment does not provide any evidence or data which suggest that these measures will not successfully protect Atascadero Creek.

Response to Comment 82-8

Comment Summary: The comment states that while the Graton Plant achieves high levels of treatment, the Laguna plant does not achieve high levels of treatment for biological and metal contaminants, and that over-irrigation with reclaimed water will adversely affect aquatic life.

Santa Rosa's reclaimed water quality is described in Appendices H-2 (Reclaimed Water Quality) and H-3 (Reclaimed Water Quality Update), and summarized in Table 4.6-1 on page 4.6-6 of the Draft EIR/EIS. Monitoring data for other dischargers, including Graton, is presented in Table 4.6-10 on page 4.6-22. There is no evidence that Graton provides a better quality effluent than the City of Santa Rosa's reclaimed water. In fact, Graton treats only to a secondary level, while the City of Santa Rosa provides tertiary treatment. The potential adverse affects of excessive irrigation on the Atascadero watershed are addressed on pages 1 through 5 in Appendix I-10 (Baseline Hydrology and Irrigation Drainage Evaluation for West and South County Reclamation Alternatives) of the Draft EIR/EIS. Measure 2.2.3: Restrict Surface and Subsurface Irrigation Water Runoff on page 2-23 of the Draft EIR/EIS is included in the Project to avoid impacts in the Atascadero watershed.

Response to Comment 82-9

Comment Summary: The comment notes that the Graton sewer district ratepayers are working to form their own district and operate their sewer, looking to achieve zero discharge and discontinue discharge into the tributaries of the Russian River. Contracting with agricultural users to irrigate wastewater is one method to achieve this goal. The comment states that the Graton district is not in a position to offer subsidies for contracts and does not want to be placed in a competitive situation with the City of Santa Rosa in regard to contracting for wastewater irrigation sites, and that it is preferable to irrigate locally.

The Long-Term Project does not include payment of irrigators for using reclaimed water. The City of Santa Rosa will work with any local sewer districts to avoid potential conflicts.