

UNITED WINEGROWERS for Sonoma County

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To: Hearing Board and consultants
From: Bob Anderson
Executive Director

CITY OF SANTA ROSA
CITY MANAGER'S OFFICE

I offer these comments on the Draft EIR in addition to those I presented in writing and in person on September 24th. On October 5th, I also met with Robin Cort, John Hake and Dave Smith at the offices of Parsons Engineering in Alameda. I provided them with a computer disk of two water balances and a revised hardcopy of the "Half Plan" which corrects the tabulation of annual river discharge. The revised "Half Plan" still limits discharges to January, February and March and stays at or below one percent during all but ten months in the 420 months included in that water balance. The 35 year average discharge is 1,368 MG up from 856 MG/year. I would request you utilize the October 4 version when making your responses.

Design:

Early in this Project, the decision was made to expand the pumps at the headworks to serve the population projections for Build-out of the adopted General Plans. In Volume I, Section 3.5, "Cumulative Projects," reference is made to the City of Santa Rosa's update of its General Plan with a notation that if population increases beyond 174,500, "a new proposal for sewage treatment and disposal will be required (pp 3.5-2,3)." This statement is in keeping with comments by City representatives during tours of the construction work in progress at the treatment plant suggesting that any additional expansion to the plant itself (beyond the headworks pumps) would need to occur at a new location. They indicate the upgrade work underway has been sized to fully utilize the plant's treatment capacity in its pipelines, pumps and ponds. How do the controlling factors in terms of expanding treatment plant capacity relate to build-out of the General Plan? [How much is determined by General Plan projections] how much by the capacity of the headworks pumps and how much by other factors, such as sizing and match-up of pipelines, pumps and ponds within the plant itself?]

In terms of the projection for amount of wastewater to be generated by the various entities, I was not able to determine in the Draft EIR how this number has changed from the original work done by West and Yost. It would be helpful to have a side-by-side comparison particularly after a significant correction was made reducing Rohnert Park's General Plan number. [However, the latest ADWF has been increased to 21.3 mgd, or 0.4 mgd higher than West and Yost's earlier number of 20.9 mgd (or an increase of 12% of the 3.3 mgd expansion from 18.0 to 21.3). What is the annual plant production attributable to ADWF under the various weather conditions?]

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- Similarly a side-by-side comparison of the design parameters would be helpful. Some numbers such as Russian River flows and treatment plant flows are basic to each alternative and should therefore be expected to remain identical. What is the relationship between river and plant flows as used in the DEIR? Also, for use in evaluating the DEIR (as well as for use in the project selection phase), it would be helpful to have in one place a comparison showing those basic numbers and how they were used throughout the DEIR. In particular the ADWF is calculated in a footnote for one alternative by averaging plant flows for June to September and in a footnote for the Geysers by calculating the ADWF's mgd using just September's flows. How was the ADWF determined for the DEIR? 007 008 009 010 011
- A separate technical memorandum was done for the Direct Discharge Alternative which included tables showing the way in which total storage needs and pipeline sizing decisions were made. Do similar technical memoranda exist for each of the other alternatives showing how they were sized and their storage needs determined? 012
- The decision-makers need a readily available month by month comparison for each of the major alternatives showing operations under different weather conditions and different years. Also it would be useful to have a more complete explanation as to which of these numbers did in effect determine the design parameters for each of the alternatives. For instance, what is the minimum amount of storage necessary under Alternatives 5A or 5B and is that necessary to satisfy agricultural irrigation requirements or in order to avoid additional contingency discharges? 013 014 015 016
- In Technical Memorandum R-3 from HA/Parsons Engineering to the City dated 30 May 1995, a proposed new storage curve is identified. Included is a statement on page two that there is a "total 1,450 MG of existing storage capacity as currently practiced." This is the same number the City referred to as "current effective storage capacity of the system in its report dated February 15, 1995 to the North Coast Regional Water Control Board requesting a renewal of the City's NPDES permit. It is also in keeping with the statement on page 3-6 of the Project Description, noting that total available storage is approximately 1500 million gallons. Are any changes anticipated which would cause a reduction in the amount of existing storage capacity? 017 018
- In the chapter on "Human Health Risks from Chemical and Biological Components" prepared by Parsons Engineering (March, 1996), reference is made (page 2-1) to data obtained from the Laguna Plant's quarterly water monitoring program (1988-1995). What are the actual plant flows by month and on an annual basis for each of those years? And how would each year's plant flow and river flow be classified according to Dry, Average and Wet Years? 019 020
- What is the variation in irrigation over the past 10 years? How does that distribution by month compare to the irrigation distribution developed by CH2MHill in Technical Memorandum RA-1 dated January 8, 1993? 021 022

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Operations:

The chapter on "Irrigation Water Quality and Salt Management Leaching Requirements" completed by Quest Engineering (Feb., 1996) tested a "worst case" scenario that a) increased irrigation application rates by 20%, b) reduced annual rainfall amounts by 75% and c) increased the salt content of reclaimed water by 22% (to evaluate increased concentrations due to the City's Water Conservation Program). The finding was "leaching requirements could still be met by rainfall" and salts "would not restrict yields (page 14)." Does this suggest that further conservation is possible without causing harm to the most likely types of crops anticipated to be grown under the reuse alternatives in Sonoma County? [Also, at other points in the DEIR where summer irrigation is proposed, does the irrigation rate also vary assuming that additional water will be applied in Dry years?] 023

In the Chapter "Aquatic Biological Resources Impact Analysis Report" prepared by Meritt Smith Consulting (June, 1996), it is noted "the estimated reclaimed water concentration during the study period was as high as 92 percent in Santa Rosa Creek" (page 28) while under the proposed design conditions, the peak concentration under contingency discharge operations is identified as 89 percent in Santa Rosa Creek. [What are the respective flows in the Russian River and plant flow distributions by month which would lead to a lower peak concentration for the 20% Lacuna Alternative? [Current "existing maximum discharge rate is 5 percent"(page 28)].] 025

Furthermore, in the same chapter (page 29), it is noted that "the maximum combined reclaimed water discharge was 242.1 cfs on 5 December 1994. The maximum discharge needed for the 20% River Discharge Alternative is identified in the Surface Water Hydrology Chapter (p.4.4-32) as 40 cfs or 4,650 MG for six months of discharge, November to May. [In the Surface Water Hydrology Chapter, the Laguna's existing discharge capacity is stated as 95 cfs. Is this discharge capacity (95 cfs) available under all flow conditions? [For Alternative 5A, what maximum discharges are proposed and under what conditions will those occur in the Laguna?] 027

Costs:

In determining the costs of pipelines, the number of \$5/linear foot per inch of diameter is cited as a rule of thumb for the purpose of checking a design estimate. Is that a constructed cost number or just meant to cover the cost of pipe without the various add-ons? [Also how does the \$5 per linear foot/inch number compare to the total cost of the 16" pipeline presently being installed as part of the City's Interim Project?] 030

The early Cost Estimates prepared by Parsons Engineering included an add-on to cover profit and overhead. Is this still part of the calculation of cost estimates presented in the DEIR? [What add-ons remain?] [In the Chapter "Geotechnical Assessment of Alternative 032

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Reservoir Sites" by Rust Environment (January, 1996) Figure 8-2 identifies six reservoirs, each sized around 1500 MG, with an estimated construction costs (before add-ons) of \$17 million or less. Another five sites each up to 3,000 MG in storage capacity are shown at less than \$28 million in construction costs. How much of their total project costs are due to add-ons?] 034 (cont.)

Truck Trips: In a technical memorandum N-6 dated October 27, 1995 from Rich Mauer at Parsons Engineering to Ivy Demand, an estimate is provided concerning the number of truck trips necessary to import filter and rock materials from local quarries to the reservoir sites. A footnote explains that the number of trips is based on 15 cubic yards for filter/drain materials and 12 cubic yards for rock material. Checking with a local supplier, I was told a typical transfer truck could haul a net load of 48,000 lbs. of filter materials (3/4 inch to 1-1/2 inch sizes) typically weighing 2,600 pounds/cubic yard (18.5 cubic yards/ truck) and 46,000 lbs. of ripper material typically weighing 3,200 lbs./cubic yard (14.4 cubic yards/truck). The numbers used by Parsons Engineering were 15 and 12 respectively, each 20% below the normal range. What would explain these difference?] 035

What is the volume of water expected to be released over the reservoirs' spillway which necessitates the addition of rough surface rocks for the purpose of increasing oxygen in the released waters in comparison to the volume of water projected to be released at the Delta and Meadowlane discharge points without the any such additions being required at those existing facilities?] 036

Monitoring

What was the size of the 1985 discharge?] 037

The Chapter "Russian River Water Quality Model" prepared by Donald Smith/Resource Management Associates (June, 1996) uses a yearly increase of 0.427 MGD for the annual increase in ADWF. The starting point is defined as January 1, 1985. In the City's NPDES Renewal Application prepared by CH2MHill (February 15, 1995), the 1985 number for "Actual ADWF" in their Table 2 is 13.8 mgd. The increase in ADWF for 1993 is shown as 0.13 mgd; for 1994 as 0.11 mgd with the "Most Likely" estimate for 1995 shown as 0.16 mgd; for 1996 as 0.19 and for 1997 as 0.23 mgd.] How does the Water Quality Model calculate future ADWFs?] Also Section 4.3.1 (page 32) describes how the Water Quality Model incorporates an increment to ADWF based on plant operation data and corresponding SCWA estimates of incremental inflow (page 32). The statement is made noting the "approach assumes that the relationship between wet weather flow (WWF) and ADWF will remain the same at build-out." Would not wet weather flows be expected to decline due to City efforts and anticipated encouragement from various regulatory bodies?] 038 039 040

Finally: Would it be possible to have a master list of all the reports completed as part of this DEIR by title, by subject and by date?] 041

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