

CITY OF SANTA ROSA
P.O. Box 1678
Santa Rosa, CA 95402

Oct. 7, 1996

OCT 07 1996

DEPARTMENT OF
COMMUNITY DEVELOPMENT

Marie Meredith
City of Santa Rosa
Community Development Department
P.O. Box 1678
Santa Rosa, CA 95402-1678

Dear Marie Meredith,

The Environmental Forum of Marin appreciates the opportunity to comment on the Santa Rosa /Subregional Long Term Wastewater Projects's Draft EIR/EIS. 001
Our comments include environmental concerns as well as the accessibility of the documents. |

The high cost and the limited availability of the documents created difficulties in responding to this public document within the city's requested time. Making these documents more easily available in the future would be a benefit to those commenting and those receiving comments. The greatest benefit would be to future projects which would receive full attention and consideration from those who would be involved in and affected by them. | 002

Since human activities and development are the ultimate cause of adverse environmental impacts, we recommend that city plans include limits on growth. | 003

Control of growth and maximum conservation measures are very important in helping decrease environmental impacts. | 004

Wastewater treatment needs to be addressed clearly and in detail since it will directly affect any and all of the proposed alternatives. These alternatives inform us of what will be done with this water and we need to know how the same water has been treated. | 005

All recommended monitoring programs need to address future conditions and effects of the project and be conducted for a minimum of 5 to 10 years. | 006

We have categorized our concerns into the areas which follow: | 007

Aquatic Biological Resources: (reference pages are from section 4.9 - Cumulative Impacts) 008

* change in aquatic habitat in the Farallones |

* the risk to aquatic and other wildlife from toxicity and bioaccumulation | 009

* (P. 91) A monitoring program will be needed to respond to species' exposures to chemical constituents in reclaimed water-directly through sediment, soil, and water and indirectly through diet. | Buildup of toxins in species' systems need to be recognized and responded to with any changes necessary. | 010
011

* (P. 51) Areas with sensitive aquatic wildlife and plant species and their habitats need to be avoided or fully protected. How can or would exclusionary buffers be able to successfully do this?]	012
*(P.55) Because of the ecological risk, monitoring of species needs to be done after short term exposures to undiluted reclaimed water as a result of pipeline ruptures.]	013
*(P. 67) What are the past successes of the Sensitive Resource Conservation Program and are there State monitoring plans to measure future results of this program when implemented?]	014
*(P. 59) How was it determined that "Loss of 15% or less of range of Lobb's aquatic buttercup will not cause range contraction or extinction " ?]	015
*In stream mitigation, the restoration and preservation of an existing degraded habitat with similar functions is considered for the loss of habitat in another. The stream that is lost may serve as home for an entirely different group of aquatic life and we question whether streams are interchangeable regardless of their location and distance from one another.]	016
* (P.51,77, 80) It is claimed that no individuals or populations or occupied habitat will be lost due to agricultural irrigation because of the establishment of exclusionary buffers and Measures 2.2.2. and 2.2.5. These exclusionary buffers intended to prevent irrigation water seepage will also prevent natural biological processes from occurring.] The serious mobility problems caused to all species, especially burrowing animals, and the effectiveness of this action in preventing irrigation and runoff waters from getting into the groundwater and waterways must be addressed.] How will potential impacts from pipe ruptures be less than significant with the use of these measures?]	017 018 019
*(P.77) How are major corridors being defined?] The loss of less than major corridors will result in great losses over time. These corridors need protection and must be considered for their value to species dependent upon them.]	020 021
*(P.90) Has the risk of toxicity and bioaccumulation been adequately measured over an extended length of time?] Has monitoring for this been planned for beyond 2 years?]	022 023
*(P.84) Is 5 years long enough to study the impact on steelhead and coho salmon from discharge into their migration corridors?] Is it correct to assume that exposure to discharge during dry winters for a maximum of 4 days will result in no bioaccumulation?]	024 025
Isn't it possible that exposure could go on for longer periods of time in dry winters?]	026
*(P.91) How has it been determined that although cumulative projects may increase species' exposure to chemical concentrations, the EQ value will not increase to 10?] Has this been evaluated over an extended period?]	027 028
*(P.91) Have studies been done on the effects that ferric chloride would have on aquatic species and other species?]	029

- *Have there been any studies concerning the arrival of introduced species in disturbed native species' habitats caused by the alternatives? The potential loss of special status species and sensitive aquatic habitat is a great concern. 030
- The Baylands around San Pablo Bay are being restored to wetland habitat. Although this is south of Highway 37, it serves as an essential habitat for birds on the Pacific Flyway. A considerable portion of this land is under Fish and Game protection. This area includes the Petaluma Marsh which is the largest undiked tidal marsh left in the bay area and will experience similar problems that will be faced by West Marin. We recommend that this area receive protection measures similar to those being considered for West Marin. 031
- Surface Water Hydrology and Groundwater(reference pages are from section 4.4 and 4.5) 032
- *(P.4.4-24) If a large storm event occurs coincidentally with an earthquake causing geyser pipeline rupture, what are the plans to contain reclaimed water? This is a serious concern especially for the Maacama fault area.
- *(P.4.4-25) Only some reservoirs (Tolay, Sears Point, Adobe Road), have diversion structures which are considered to adequately divert water around them. What is planned for those reservoirs that do not have this feature? 033
- *(P.4.4-31) For Alt. 5B, what will the impacts on water quality be from discharging only during very low flows and at velocities of less than 3ft/sec.? 034
- *(P.4.4-34) Mitigation for Alt. 5B is to prohibit discharge during flood stage, however where will this water then go? 035
- *(P.4.5-15) Most of the 21 monitoring wells in the Project area may not be representative of the reservoir subbasin. Will the monitoring well system be made more representative of conditions in the area? Since no new data was obtained from Tolay Creek and Two Rock, are there plans for future testing of them? 036 037
- *(P.4.5-15) What will be done about the condition of the many wells which lack sanitary seals and degrade groundwater? Are there plans for improving and monitoring wells showing water quality problems from metals and contaminants? 038 039
- *(P.4.5-18, P.4.5-28) Reclaimed water with nitrate levels exceeding MCLs, will increase the already high nitrate levels of groundwater. These levels will need to be lowered by treatment plants or other means. 040
- *(P.4.5-25) Will the system to be used to locate wells be effective in locating those no longer being used or undocumented? Are there plans to enhance this system? 041 042

*(P.4.4-32 and 4.5-49) Replacement water supply would be used in mitigating for wells affected by high nitrate levels. Where would the "replacement water supply" come from and what would be the quality of this water?	043
Surface Water Quality: (reference pages are from section 4.6)	044
*(P.35) Are the Atascadero and Green Valley Creeks which generally have poor water quality, being regularly tested and monitored? Are there plans to control summer irrigation waters from impacting these creeks?	045
*(P.67, 77) How will pipeline ruptures be detected and responded to? It is assumed that exposures from ruptures will be of short duration but what about those ruptures undetected or responded to later than expected? Are there plans in place to respond to the resulting longer exposures? Pipeline ruptures may exceed water quality values by introducing reclaimed water into streams. Water quality testing and monitoring should be done for short term as well as long term exposures.	046 047 048 049 050
*(P.68) Although the Bay Flats are not considered a special site by this Draft EIR/EIS, we recommend that high standards be used for this area because of its important habitat value for a great number of species.	051
*(P.76-7, 79) Are there plans to have a qualified person on site during construction who will make sure that erosion control practices and other practices are used to prevent adverse impacts?	052
*(P.80) Will water quality testing be done in the event of a discharge from a spillway? We recommend testing due to the water quality of the reclaimed water and the possible public health and environmental risks.	053
*(P.93) The 20% design discharge scenarios show more adverse than beneficial impacts. Does the proposed mitigation include a monitoring program of more than 2 years? Frequent monitoring of adverse and beneficial impacts is recommended in order to control adverse impacts effectively.	054
*(P.107) The high cyanide concentrations in reclaimed water which will exist before storage with significant impacts on the Laguna and Santa Rosa Creek if a direct discharge occurred. Is there a plan to respond to such a scenario?	055
*(P.94) This chart shows that impacts from operation and maintenance and Contingency Plan will cause significant impacts before and after under Alt. 5A. If an alternative is chosen leaving such impacts, is further investigation being planned to lower these impacts?	056
*(P.109) Does the Cyanide Monitoring and Control Program include a long term plan with frequent sample collecting? Do all other programs, (Toxicity Control Program, Source Control Program, etc.) include this?	057 058

|(P.71) Is information regularly being gathered from the sites to add to the information 059
from the watershed models which are limited in the information they provide? The
unpredictability of certain natural events will not be noted on a model. |

|Less than significant impacts may have greater impacts later on. A much greater impact 060
may be created by many small impacts. Significant impacts which remain so before and
after mitigation, need to be investigated further. |We emphasize the use of a long term 061
extensive monitoring program for the serious impacts which all the alternatives will have
on water quality. |

|**Geology:** 062

*The 42 inch pipelines to the Geysers will be under 600 lbs. of pressure and cross two
fault lines and unstable terrain of different types of rocks. If there was a rupture, 1.7
million gallons or more of water would be released. The risk of environmental damage
from this is too high. |

|*We are concerned about low water quality of the pipeline water and how any ruptures as 063
in the above scenario could possibly be mitigated. |

|*The Tolay Creek Dam is located near an active fault which could cause 2 to 4 feet 064
displacement. |It also crosses over the inactive Tolay Creek Fault which connects with the 065
active fault. This area concerns us because of the significant impact which could occur. |

|*Unstable slope conditions in Bennet Valley and the proximity of the Healdsburg Rodgers 066
Fault, could cause an 8 feet ground displacement with a 7.0 earthquake. This significant
impact is a concern. |

|*Significant damage to steel pipes and concrete structures could occur in the Lakeville 067
area of San Pablo Bay. We believe the corrosive soils and damages related to liquification
make the South County a very risky area. |

|The Marin Countywide Plan (P.4.3.53), states that "water quality should be maintained or 068
enhanced to promote the continued environmental health of natural waterway habitats".
This an excellent standard to strive for. |

We thank you for considering our many concerns.

Sincerely,
Julie Grantz, President
Environmental Forum of Marin
P.O. Box 74
Larkspur, CA 94977

