SIERRA CLUB MARIN GROUP

110 San Mateo Way, Novato, CA 94947

October 6, 1996

Sonoma County Water Agency
Att: Erica Hendricks
P.O. Box 11628
Santa Rosa, CA 94506

RE: DRAFT SANTA ROSA SUBREGIONAL LONG-TERM WASTEWATER PROJECT EIR/EIS

Dear Sirs/Madams:

The Sierra Club Marin Group has reviewed the Santa Rosa Wastewater EIR/EIS to the best of our ability. The main focus of our comments is on the South County Alternative because the Sonoma Group is more knowledgeable about other alternatives, and because of limitations on the availability of the EIR in Marin County. We also address several issues of concern to the Sierra Club regarding the alternatives. 001

1. The policies attributed to the Sierra Club are in error. The approved Sierra Club position on the Santa Rosa Wastewater project is attached.

2. While we understand that planning and approval of growth potential is the responsibility of each jurisdictional entity, it is appropriate for this incredibly expensive and possibly environmentally damaging joint project, that the jurisdictions get together and agree on a possible reduced growth alternative. This could be developed by reducing the growth potential proportionately for each jurisdiction. By reducing growth potential sufficiently, the capacity of the system could be reduced and consequently costs and environmental impacts could be reduced. 002

3. While the EIR/EIS states there would be no environmental risk from discharging into the Russian River, the community has little confidence in this claim, perhaps because of the history of discharges into the river. The discharge of clean water would be a benefit to the river system, so it appears to us that it is in the interest of the aquatic resources and the public to at least study options that would assure the water would be safe. We again request that the use of reverse osmosis, which would remove everything including heavy metals and salt, be evaluated. The fact that a brine is left after reverse osmosis should not be a problem. The District should be accustomed to treating sludge from their existing treatment system. Why couldn't the sludge 003

003 (cont.)

from reverse osmosis be treated in the same way?

004 4. A map showing the existing locations where water is taken from the Russian River and where effluent would be discharged to the River should be provided. What would be the potential impact of locating discharge pipes upstream of water supply intake pipes?

005 5. A map showing the location of discharge(s) to the Petaluma River from South County irrigation should be provided.

006 6. Provide a more complete discussion of the South County Alternative with regard to the baylands irrigation component and interface with the Petaluma River and related habitats. Of the approximately 2,100 bayland acreage proposed for irrigation, how much of that is seasonal wetlands? 007 What is the location of seasonal wetlands that existing on these baylands? Show the existing seasonal wetlands on a map. 008 How would runoff from the bayland irrigation sites be prevented from entering the River and Bay? 009 How would runoff from irrigation sites upstream be prevented from flowing to the Petaluma River and Bay?

010 7. How would the South County bayland irrigation lands be managed? Would the management be similar to the Novato Sanitary District irrigation lands? These have no ponding and reduced wetland habitat value from other baylands in the vicinity because they are tilled and grazed. How similarly or differently would the Santa Rosa project baylands be managed?

011 8. The potential for conversion of tidal marsh to fresh water marsh is unclear? The EIR/EIS seems to dismiss significance of marsh conversion in South County. What is the potential for tidal marsh conversion to less saline marsh in the South County?

012 9. Reference is made to a blockage between the Tolay reservoir site and Tolay Creek? What is the nature of this blockage? Is it permanent? Could it be removed?

013 10. Table 2.3-1, page 2-78 of the Mitigation and Monitoring Program states that the creation, restoration or preservation is being considered as mitigation for biological resource losses. Preservation of existing habitats while approving habitat destruction would result in a net loss of the resource. Therefore, we urge that preservation not be considered acceptable mitigation. 014 In addition, a mitigation ratio of 1:1 for wetlands, riparian and oak woodland habitats is far below most projects we have reviewed. We recommend that the acreage required be increased.

015 11. The aquatic resources appendix states that migratory fish were only found in one stream. The question should be what native and anadromous fish were found in the streams. It seems highly improbable that no anadromous or other native fish were found in any but the Carroll Rd. site among the many streams

considered for use by this project. 015 (cont.)

12. What would the potential impacts of a dam for the Tolay Reservoir be on aquatic resources? 016 What sites could serve as mitigation for loss of the seasonal and other wetlands on the Tolay Reservoir site and irrigation of the Baylands? 017

13. The various wetland types appear to be defined differently in various documents. We suggest that a classification system be used that would ensure the ponded seasonal wetlands that develop on diked baylands would be included. These seasonal wetlands provide important habitat for migratory species that winter in San Pablo Bay. 018

14. There is no discussion of migratory birds of the Pacific Flyway and the importance of San Pablo Bay, tidal marshes along the Petaluma River and diked baylands along the Petaluma River to species that use this flyway. How the baylands, associated uplands and seasonal wetlands on the baylands provide for migratory birds of the Pacific Flyway should be discussed. The current discussion is too fragmented and incomplete. 019

15. Were any bird censuses done on the baylands? If so, how many surveys and at what time of year were they done and what species were observed? If they were not done, they should be this winter and presented. 020

16. The percentages of special native habitats that could be removed by the project before reaching a level of significant impact to be far to high? The EIR/EIS should explain why it was decided that up to a 25% loss of sensitive terrestrial wildlife habitat, this means oak woodlands and riparian habitats, and 15% of CNPS plant lists 2, 3 or 4 and 20% of aquatic habitats could be lost before the impact would be considered significant? This would mean the loss of thousands of native trees, hundreds perhaps thousands of acres of existing wildlife habitat, hundreds of acres riparian habitats, would be okey. Even if these percentages were lower, a determination of significance cannot be based simply on percentages. It must also consider actual acreage and the location impacts of the loss. Justification for the choice of percentages should be provided and the numbers should be reduced. 021

17. What are the potential sites on which the resources lost with the West and South County alternatives can be mitigated? Knowing that the potential mitigation sites exist is important to ensure the proposed mitigation can be accomplishes, that the same habitat types that would be lost can indeed be replaced. It could be that lands with suitable soil, water and other characteristics cannot be found and so replacement mitigation will be impossible. 022

18. A technical report on Irrigation of Baylands states that even after 25 years, accumulation of metals in the reclaimed 023

water in the soils would not affect productivity. An analysis of 25 years is not sufficient for a project that will have a functional life of much more than that. What would soil conditions be in 50 years? When would there be evidence of bioaccumulation in invertebrates and other creatures in the soils that would in turn be consumed by higher order species,. 023 (cont.) 024

19. A buffer or setback of 30 feet around wetlands is not enough to ensure protection of wetland resources. We use 100 feet as a rule-of-thumb. 025

20. The Questa report HYDROLOGIC/WATER QUALITY EVALUATION OF IRRIGATION OF BAYLANDS WITH RECLAIMED WATER reveals high levels of certain contaminants in runoff in drainage ditches. Tests were done on runoff from the NSD and Vallejo systems indicate a potential increase with some metals as copper and zink. No tests appear to have been performed on soils, just on runoff quality. Tests of soils irrigated with reclaimed water should be devised, conducted and reported in the responses to comments. It is possible that there are also high levels of metals in the soils of baylands that are now being irrigated with reclaimed water. 026

21. Also, how would the proposed high efficiency irrigation management in the South County reduce or eliminate high levels of heavy metals in the soils and in drainage ditch waters which would eventually be discharged to the River and/or Bay? Is high efficiency irrigation management the same as the higher irrigation application rate mentioned in Volume 1? 027

In conclusion, we would like to request that the Marin Group receive a copy of the responses to comments and final EIR/EIRs. Providing one hard copy and a CD ROM that could only be utilized by a person with a CD ROM did not allow the Sierra Club or three other interested organizations sufficient ability to read and analyze the documents and review them internally. 028

Sincerely,

Susan Stompe
For the Marin Group

RESOLUTION APPROVED BY NORTHERN CALIFORNIA/NEVADA REGIONAL CONSERVATION COMMITTEE OF THE SIERRA CLUB AT ITS MEETING ON MAY 15, 1994 029

The NC/RCC of the Sierra Club supports a long-term wastewater project for the City of Santa Rosa that:

1. maximizes water conservation;
2. maximizes reclamation and reuse, including reuse to benefit natural resources and agriculture;
3. select the most environmentally beneficial option;
4. protects the historic salt-brackish characteristics of San Pablo Bay and coastal estuaries, and the historic characteristics of the Russian River and other environmentally sensitive areas;
5. is based on a meaningful reduction in the growth potential of the service area of the Santa Rosa Subregional Water Reclamation System.