



*Trout Unlimited
of California*

October 7, 1996

Ms. Marie Meredith
Environmental Coordinator
City of Santa Rosa
100 Santa Rosa Ave.
P.O. Box 1678
Santa Rosa, Cal. 95402-1678

Subject: Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS.

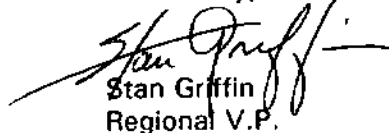
Dear Ms. Meredith

Trout Unlimited, North America's leading coldwater fisheries conservation organization still has concerns for the potential impacts of Santa Rosa's wastewater on Salmon and Steelhead trout in the Laguna de Santa Rosa and the Russian River. Our concerns have not been resolved by the Draft EIR/EIS OF July 1996. 001

Due to the paucity of scientific information and the fragile nature of the Russian River anadromous fishery, ie., Coho Salmon and Steelhead we are opposed to the proposed Alternate 5 A&B. We believe Alternate 5 will cause significant long term adverse impacts to these public trust resources. As one of the trustee's of this resources you are charged with insuring the project will not harm the public trust resources.

Until you have such scientific information, that will stand up in Court, that clearly demonstrates that there is no accumulative adverse impacts on the public resources, we have no option them to oppose Alternative 5.

Yours truly,


Stan Griffin
Regional V.P.

CITY OF SANTA ROSA
P.O. Box 1678
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**DEPARTMENT OF
COMMUNITY DEVELOPMENT**

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COPY

February 29, 1996

Stan Griffin
Natural Resource Director
Trout Unlimited of California
27 Dorest Lane
Mill Valley, CA 94941

Dear Mr. Griffin:

The purpose of this letter is to respond to comments and questions in your letter of December 2, 1994. Our records show that the City first received the December 2, 1994, letter attached to your transmittal dated January 16, 1996, on January 18, 1996. I apologize for any part the City might have had in this miscommunication.

Your letter raised several points, and each are addressed below. Your comment or question is shown in bold, and the response of the City's consulting team follows:

- **Status of studies.** The study program in the 1994-95 and 1995-96 seasons included evaluation of upmigrating and downmigrating steelhead, and assessment of juvenile density in nursery areas. No field studies of steelhead migration are currently being conducted by the City.
- **Relationship of juvenile steelhead in Santa Rosa and Mark West Creek watersheds to effect of reclaimed water on upmigrating adult steelhead.** The data that have been collected as part of this program show the following:
 1. Five years of fyke net trapping of upmigrating fish with concurrent monitoring of reclaimed water concentration in the Laguna have shown that adult steelhead upmigrate without any apparent regard for reclaimed water concentration. Providing a seven- and ten-day no discharge "window" during the prime migration period (late January - early February) during two years did not result in increased catches.

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2. The density of juveniles generally correlates with environmental conditions (primarily flow) in the nursery areas.
3. Juvenile and post-spawned adult steelhead successfully downmigrate from nursery areas through the Laguna.

From this, the team of consultants has concluded that reclaimed water is not an important factor affecting the number of steelhead produced in the Santa Rosa and Mark West Creek watersheds.

- **Count of upmigrating and downmigrating steelhead.** The study program was undertaken to evaluate the effect of reclaimed water on steelhead migration and has clearly shown that adults successfully migrate in both directions through the Laguna. The data permit an indirect estimate of total population size, but no attempt has been made to count steelhead migrating through the Laguna during flood flows. Facilities necessary to count all of the fish under the full range of Laguna flows would cost millions of dollars and would not provide information that would be of greater support to the City in the selection of a long-term reclaimed water management project.
- **Do steelhead from Santa Rosa and Mark West Creek return to spawn or does reclaimed water confuse their olfactory capability to identify their stream of origin?** The results of the study program do not answer whether individual steelhead from Santa Rosa and Mark West Creek return to spawn. However, wild adult steelhead return each year to spawn in the same reaches of these streams. The field biologists have observed no introgression of hatchery fish in either Santa Rosa or Mark West Creek. The likelihood that all of these adults are strays that were spawned in other watersheds is extremely remote. In fact, the timing of upmigrating steelhead in Mark West Creek and Santa Rosa Creek is very distinct, suggesting that the populations are not of the same immediate stock (contrary to what would be expected if the streams were populated solely by strays). Our consultants have thus concluded that most of the steelhead that spawn in Mark West Creek and Santa Rosa Creek originated therein.

- **Impairment of water quality in Laguna needs to be addressed, particularly dissolved oxygen problems.** The Laguna de Santa Rosa was found to be impaired by the Regional Water Quality Control Board in the *1990 Water Quality Assessment* report as a result of organic loads (which depress dissolved oxygen), nitrogen loads (which stimulate algae that depletes dissolved oxygen) and ammonia loads (which causes toxicity). The RWQCB established pollutant load reduction goals for all sources of these compounds, including the Subregional System. Each of the long-term reclaimed water management alternatives is being evaluated in the EIR/S to determine if the load reduction goals would be met by the alternative.
- **What are the cumulative impacts of reclaimed water with other projects on fish in the Russian River estuary?** The effect of reclaimed water discharges in combination with other discharges is currently being evaluated, and the results will be reported in the long-term wastewater EIR/S.

Please respond if this letter does not address your comments. Thank you very much for your interest in our program.

Sincerely,

Marie Meredith

Marie Meredith
Environmental Coordinator

*Regret
info - furnished
not conclusive*



*Trout Unlimited
of California*

December 2, 1994

Ms. Marie Mededith
Environmental Coordinator
City of Santa Rosa
P.O. Box 1678
Santa Rosa, Cal. 95402

Re: Santa Rosa Subregional Long Term Wastewater Project:

Dear Ms Meredith:

Trout Unlimited, America's leading coldwater fisheries Conservation, has serious concerns for the potential impacts of Santa Rosa's wastewater on Salmon and Steelhead trout in the Laguna de Santa Rosa and the Russian River.

As of this writing we have not been convinced that the Migratory Fish Study, has answered our concerns for the health and behavior of the migrating fish in the watershed. Appreciate the fact that fish studies are ongoing and hopefully we can continue to meet and resolve these issues.

The present fish migrating study results appear to be based on assumptions. The fact fish have been found in the upper reaches of Mark West and Santa Rosa Creeks is not in our opinion conclusive that there is no effect from wastewater releases. Did those fish migrate through the Laguna during a window of no wastewater releases or flood flows when the concentration of wastewater was practically zero. Believe we should have a count of fish entering the Laguna for upstream and the count returning. We have no information on returning spawners

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three or four years after smolting. Do they have the ability to locate Mark West and Santa Rosa Creeks waters and return to their original nursery area. Does the wastewater confuse their so-called "homing" instincts.

The dissolved oxygen problem has not been solved. The problem in the Laguna is in our opinion a serious one and has to be addressed. It is mentioned under Task 22.2, however, have not to date seen those studies being related to the so-called "Fish Study". What were the results of the 1994 surveys? As you are familiar certain levels of dissolved oxygen are lethal to fish. Their has been a tendency to blame agriculture for the problem and not addressing the additional impact wastewater nutrients will have on the problem. In any event the whole problem of the Laguna being an impaired water body has to be addressed and cleaned up.

Another important factor is the cumulative impacts the wastewater discharges have on the Russian River estuary.

As previously mentioned our chief concern is the health of the anadromous fishery and a serious effort to turn around the declining fishery which will in turn improve the Sonoma County's environment and economy..

Appreciate being kept informed of any addition fish study information as it becomes available as we definitely wish to cooperate to solve our fishery problems.

Yours truly,

Stan Griffin
President Northern California
Trout Unlimited of California

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