

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
**NORTH COAST REGION**  
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October 1, 1996

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

**OCT 03 1996**

**DEPARTMENT OF  
 COMMUNITY DEVELOPMENT**

Ms. Marie Meredith  
 City of Santa Rosa  
 P.O. Box 1678  
 Santa Rosa, CA 95402-1678

Dear Ms. Meredith:

Subject: Draft Environmental Impact Report/Environmental Impact Statement,  
 (EIR/EIS) Santa Rosa Subregional Long-Term Wastewater Project  
 SCH # 94103069

The North Coast Regional Water Quality Control Board hereby submits the following comments on the draft EIR/EIS for the Santa Rosa Subregional Long-Term Wastewater Project. At a future date, this EIR/EIS will provide the basis on which the Regional Water Board may amend the Action Plan for the Santa Rosa Area which is contained in the Water Quality Control Plan for the North Coast Region (Basin Plan) and subsequently reissue or modify the current NPDES Permit for the City of Santa Rosa, Laguna Subregional Wastewater Treatment, Reuse and Disposal Facilities.

#### **CHAPTER 4.4, SURFACE WATER HYDROLOGY**

Page 4.4-29, Impact 4.7.5 & 6 001

The discussion states that the maximum flow of incidental agricultural runoff would be 0.1 cfs. This flow rate should be substantiated as there have been documented incidents of incidental agricultural runoff exceeding this flow rate. In addition, the final EIR/EIS should recognize that the discharge of reclaimed water as agricultural runoff is prohibited at all times in Stemple and Americano Creeks and is prohibited from May 15 through September 30 in the Russian River and its tributaries by the Basin Plan. 002

#### **CHAPTER 4.5, GROUNDWATER**

Page 4.5-32, Impact 5.5.1A 003

The draft EIR states that reclaimed water from the storage reservoirs in Alternatives 2 and 3 could increase the level of nitrate in local groundwaters and adversely affect water supply wells. The mitigation

Ms. Marie Meredith  
 October 1, 1996  
 Page 2

proposed is to provide a replacement water supply for the affected wells. Contamination of the water supply wells would be inconsistent with State Water Resources Control Board Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Waters in California. As presented, the proposed mitigation would not alter this inconsistency. The EIR/EIS should include a discussion of other possible mitigation measures (preventing seepage from the reservoirs, additional treatment of the water prior to its being discharged to the reservoirs, etc.) that could be implemented to ensure consistency with Resolution No. 68-16. 003 (cont.)

Page 4.5-32, Impact 5.5.1B,C,D 004

Please see comments on Impact 5.5.1A.

Page 4.5-47, Impact 5.5.2 005

Please see comments on Impact 5.5.1A.

#### CHAPTER 4.6, SURFACE WATER QUALITY

##### General Comments

It was difficult to determine the basis for the estimates presented in the many tables set forth in Chapter 4.6. Some of the water quality relationships discussed are complex and they were not clearly explained in the discussion. The chapter would benefit from additional explanation and/or graphics. The discussions of dissolved oxygen seemed to minimize the importance of the Basir Plan minimum objective of 7.0 mg/l in the Laguna de Santa Rosa. It would be helpful to present the historical dissolved oxygen values with simulated values for each alternative. 006  
 007  
 008

The presentation of biostimulatory effects was unclear and the rationale for the 10% criterion for significance was not well substantiated. While the rationale for selecting dry, normal, and wet years for analyses of flow conditions was well explained, the discussion would benefit from an estimate of the return frequency. The cumulative impacts assessment was not well explained, and did not clearly set forth if the cumulative impacts of discharges upstream of the alternative discharge locations had been factored in. A plot of conductance vs. river mile for existing conditions and model simulations for each alternative may provide substantiation and clarification of the cumulative impacts assessed. 009  
 010  
 011  
 012

Ms. Marie Meredith  
October 1, 1996  
Page 3

### Specific Comments

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Page 4.6-3, Inland Water Regulation 013

The draft EIR/EIS references a Waste Reduction Policy (1995) that was established by the Regional Water Board. This was actually a Waste Reduction Strategy, not a policy. This should be clarified in the final EIR/EIS.]

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Page 4.6-4 014

The draft EIR/EIS states that the study plan and resulting technical reports produced the technical information that is needed for the Regional Water Board to conduct an antidegradation analysis should the selected alternative require such an analysis. The draft EIR/EIS further states that the "non-technical" component of the antidegradation analysis is not within the scope of this EIR/EIS. The State's Administrative Procedure with respect to implementation of the antidegradation policy requires that the Regional Water Board shall request that the information needed to conduct an antidegradation analysis be included in an EIR. This request was included in the Regional Water Board's comments on the NOP for this EIR/EIS. The lead agency is responsible to include the necessary antidegradation information in the EIR. Thus, the "technical" and "non-technical" components that the Regional Water Board will need to conduct an antidegradation analysis should be clearly described in the final EIR/EIS. A copy of the State's Policy with regards to the antidegradation analysis is attached to these comments for your information.]

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Page 4.6-6, Table 4.6-1 015

For clarification purposes, the table should include values for specific conductance and total dissolved solids as these constituents are discussed in subsequent sections of the Chapter.]

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Page 4.6-10, Russian River 016

The discussion of Russian River functions would be enhanced by stating the designated beneficial uses from the Basin Plan.]

Ms. Marie Meredith  
October 1, 1996  
Page 4

Page 4.6-21, Table 4.6-9

017

The table indicates that the City of Ukiah treats wastewater to a secondary level. The City of Ukiah treats wastewater to a tertiary level. |

Page 4.6-49, Table 4.6-25

018

For station BIS-16.1 in Big Sulphur Creek, the listed value for the average concentration of iron exceeds the reported range. This should be corrected. |

Page 4.6-61, Table 4.6-27

019

The rationale for expressing planktonic algal biomass in terms of turbidity is not well explained. This should be clarified as the Basin Plan objective for turbidity of 20% over background applies to any source of turbidity, not just planktonic algal biomass. |

Page 4.6-71

020

The statement that exposure from pipeline ruptures would be of short duration needs to be substantiated. Short duration may not always be the case. |

Page 4.6-71, Dissolved Oxygen

021

The discussion states that the monthly average dissolved oxygen concentration was used in the three years simulated in the model runs. The minimum dissolved oxygen concentration is more critical to aquatic life. A discussion of how the various alternatives impact the minimum concentration of dissolved oxygen in the affected stream reaches should be included in the final EIR/EIS. These minimum values should be compared against the Basin Plan objectives. A graphical presentation could help clarify this comparison. |

Page 4.6-76, Impact 6.3.1-4, Urban Irrigation

022

The discussion indicates that urban irrigation with reclaimed water does not result in incidental runoff to area streams. Incidental runoff from urban irrigation has entered area streams. | In addition, the final

023

Ms. Marie Meredith  
October 1, 1996  
Page 5

EIR/EIS should recognize that the discharge of reclaimed water as urban irrigation runoff is prohibited at all times in Stemple and Americano Creeks and is prohibited from May 15 through September 30 in the Russian River and its tributaries by the Basin Plan. ] 023 (cont.)

Page 4.6-85, Agricultural Irrigation 024

Please see comment on Impact 4.7.5 & 6. ]

Page 4.6-88, Impact 6.7.1 025

In the "after mitigation" discussion regarding the dissolved copper levels in reclaimed water, a concentration of 0.08 mg/l of dissolved copper is given as the concentration of samples collected since September 1995 and indicated a potential long-term reduction in dissolved copper. It appears that this figure is in error since the concentration of dissolved copper in reclaimed water from 1991 through January 1995 is listed as being 0.01 mg/l. ]

Page 4.6-91 026

In the discussion of discharge operations, a statement is made that the restriction of discharges beginning before the flow of the Russian River initially reaches 1000 cfs is not used in the simulated operation of the project alternatives. While Regional Water Board staff have indicated support for the removal of this restriction, the removal of the restriction cannot occur without the approval of the Regional Water Board. ]

Page 4.6-106, Impact 6.9.1, Conductivity 027

The discussion indicates that there is a lack of conductivity data in the Russian River upstream of the confluence with the Laguna de Santa Rosa. The Regional Water Board has a substantial amount of conductivity data in this reach of the Russian River and will provide copies of these data to the consultants so that a more detailed analysis can be included in the final EIR/EIS. ]

Page 4.6-107, Impact 6.9.1, Conductivity 028

The analysis indicates that for Alternative 5A, a significant increase in conductivity in a reach of the Russian River upstream of the Laguna

Ms. Marie Meredith  
October 1, 1996  
Page 6

de Santa Rosa will occur and there is no feasible mitigation identified. 028 (cont.)  
The discussion goes on to state that the simulations were run using conductivity data for the lower river due to a lack of conductivity data from the upper river. The model simulations should be run again using conductivity data from the upper river. Please refer to the comments on conductivity, Page 4.6-106, Impact 6.9.1. ]

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Page 4.6-109, Impact 6.9.1, Cyanide

029

The discussion states that cyanide in the discharge could cause a significant adverse impact in the Laguna and/or Santa Rosa Creek and no mitigation is proposed. Should the No Project alternative be selected and if monitoring shows that cyanide is having a significant adverse impact on the beneficial uses of Laguna and/or Santa Rosa Creek, the Regional Water Board will require that the impact be mitigated. ]

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Page 4.6-109, Impact 6.9.1, Dissolved Oxygen

030

The discussion indicates that there will be a significant adverse impact (a reduction in dissolved oxygen concentration of 0.5 mg/l or greater) in dissolved oxygen concentration with no mitigation identified. The final EIR/EIS should include a discussion of the minimum concentration of dissolved oxygen predicted and compare these minimum values to the Basin Plan water quality objective (please see comment on discussion on Page 4.6-71 above). In addition, a more complete discussion of the actual months when these impacts are predicted to occur for each of the hydrologic years for which the simulations were run should be included in the final EIR/EIS. ]

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Page 4.6-115, Impact 6.9.2, Biostimulatory Substances

031

The discussion indicates that after mitigation there will still be significant adverse impacts in Alternatives 2 and 5. Table 4.6.-41 on Page 4.6-116 depicts the number of months of significant adverse impact as a percentage of the analyses. A more complete discussion of the actual months when these impacts are predicted to occur for each of the hydrologic years for which the simulations were run should be included in the final EIR/EIS. ]

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Page 4.6-121, Impact 6.9.2, Turbidity

032

The discussion indicates that a significant adverse impact on turbidity after mitigation will occur with Alternative 5. A more complete discussion of the actual months when these impacts are predicted to

Ms. Marie Meredith  
October 1, 1996  
Page 7

occur for each of the hydrologic years for which the simulations were run should be included in the final EIR/EIS. ] 032 (cont.)

Page 4.6-139, Conductivity Evaluation above the Laguna 033

The statement "For the purposes of this analysis, the incremental (cumulative Project) discharge from other communities was assumed not to lower the baseline conductivity in the Russian River above the Laguna, and will probably cause conductivity to increase." should be substantiated. The final EIR/EIS should clarify if the statement was based on a review of actual data or on model simulations. ]

Page 4.6-142 034

The discussion indicates that there will be significant adverse impacts from cumulative projects. The analysis in the draft EIR/EIS was based upon model simulations run for a normal year. The cumulative impacts analysis should include a discussion of the results of simulations of dry and wet years also. In addition, a more complete discussion of the actual months when the impacts are predicted to occur for each of the hydrologic years for which the simulations are run should be included in the final EIR/EIS. ]

CHAPTER 4.7, PUBLIC HEALTH AND SAFETY 035

Page 4.7-47, Impact 7.5.1

Please see comments on Impact 5.5.1A. ]

Page 4.7-63, Impact 7.1C 036

With respect to nitrate contamination of groundwater, please see comments on Impact 5.51A. ]

CHAPTER 4.9, AQUATIC BIOLOGICAL RESOURCES

Page 4.9-56, Impact 9.5.1 037

The draft EIR/EIS states that the proposed storage reservoirs in alternatives 2, 3A, 3B, 3D, and 3E will result in the loss of habitat used by sensitive, threatened or rare species. The proposed mitigation

Ms. Marie Meredith  
 October 1, 1996  
 Page 8

is to relocate any affected organisms to newly created habitat at another location. This proposed mitigation may not be adequate. In order to approve a Basin Plan amendment, the Regional Water Board will need to obtain a finding of non jeopardy from the California Department of Fish and Game, U.S. Fish and Wildlife Service and U.S. Army, Corps of Engineers, with respect to the existence of any endangered or threatened species or the destruction or adverse modification of habitat essential to the continued existence of the species. The final EIR/EIS should address this concern. 037 (cont.)

Page 4.9-58, Impact 9.5.2 038

Please see comments on Impact 9.5.1.

Page 4.9-59, Impact 9.5.3. 039

Please see comments on Impact 9.5.1 |

Page 4.9-62, Impact 9.5.4 040

Please see comments on Impact 9.5.1 |

Page 4.9-86, Impact 9.1C 041

Please see comments on Impact 9.5.1 |

Page 4.9-86, Impact 9.2C 042

Please see comments on Impact 9.5.1 |

Page 4.9-87, Impact 9.3C 043

Please see comments on Impact 9.5.1 |

Page 4.9-87, Impact 9.4C 044

Please see comments on Impact 9.5.1 |



Ms. Marie Meredith  
October 1, 1996  
Page 9

If you have any questions regarding these comments, please contact Bob Tancreto at (707) 576-2695 or Tuck Vath at (707) 576-2699.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ben Kor".

Benjamin D. Kor  
Executive Officer

CTV:lmf/eir96com

cc: Nadell Gayou, Department of Water Resources, 1416 Ninth Street, P.O. Box  
942836, Sacramento, CA 94236-0001  
State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814

