



COUNTY OF SONOMA

PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 527-1900 FAX (707) 527-1103

Field Operations • Code Enforcement • Permits • Environmental & Comprehensive Planning

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

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

October 7, 1996

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DEPARTMENT OF
COMMUNITY DEVELOPMENT

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT (EIR/EIS) FOR THE SANTA ROSA SUBREGIONAL LONG-TERM WASTEWATER PROJECT

Dear Ms. Meredith:

Thank you for the opportunity to review and comment on this important EIR/EIS, which analyzes five options for future disposal of treated wastewater from the Subregional Treatment Plant. Due to the significance of this project to both the City and surrounding unincorporated areas, the County has instituted a new procedure for review of this EIR/EIS. Rather than the past practice of submitting independent comments from various County departments, the Permit and Resource Management Department is serving as a clearinghouse for comments from departments, agencies and/or districts for which the Board of Supervisors also serves as Board of Directors, including the following:

- Permit and Resource Management Department (PRMD).
- Sonoma County Water Agency (SCWA); see attached.
- Department of Transportation and Public Works (DTPW).
- Agriculture and Open Space District (APOS).
- Department of Health Service (DHS).

A list of persons who acted as EIR/EIS reviewers for these agencies, and their telephone numbers, is also provided as an attachment.

Overview of County Comments. The County's main concerns regarding the disposal alternatives addressed in this EIR/EIS, and the environmental impacts associated with those alternatives, can be summarized as follows:

1. Comments by the DTPW express great concern for the impacts of construction activity on County roads, and the ability of the City to detect and restore damage to roadbeds. The DTPW requests that the final Mitigation Program include a phase for consultation with DTPW staff regarding site-specific details of the alternative selected for implementation.

2. Comments by the APOS express concern regarding the impact of Alternative 4: Geysers Recharge on scenic resources in the areas affected by the proposed pipeline and pump station.

3. Comments by PRMD express concern regarding the consistency of various alternatives with relevant portions of the Sonoma County General Plan. Areas where these concerns exist include the Land Use Element and Map, the Resource Conservation Element, the Open Space Element, and the Noise Element.	004 005 006 007
4. Comments by PRMD also note that groundwater impacts accompany the alternatives which employ reservoirs. Significant numbers of existing wells are proposed for abandonment under these alternatives, which entails the provision of a substitute water supply by the City. In the future, significant areas would have groundwater that would be composed of 20% or more tertiary-treated reclaimed water, and even larger areas would experience concentrations of reclaimed water that are less than 20%. Widespread infiltration of groundwater with reclaimed water could have long-term adverse effects on water quality and the agricultural economy.	008 009 010
5. Comments by the SCWA suggest that additional analysis of the constituents of reclaimed water may be necessary for Alternative 5A: Discharge to Russian River.	011
6. Many adverse impacts identified in the EIR/EIS are associated with the large scale of the reclamation facilities. These impacts include groundwater infiltration and mounding, pump station noise, the possibility of excess runoff to rivers, creeks and estuaries, and the disruption of aquatic and terrestrial habitat. More numerous, but smaller reservoirs may be employed in a manner that could achieve disposal and reclamation objectives with a lesser degree of environmental impact.	012 013 014 015 016 017
Interpretation of Mitigation Measures. The County notes that numerous actions which mitigate environmental impacts have been incorporated into the Project Description, while mitigation measures listed in Section 4 of the EIR/EIS are consultant proposals which have not yet been incorporated into the Project Description. These comments assume that all mitigation measures proposed by the consultant which form the basis of an impact rating of "less than significant after mitigation" will be accepted and implemented by the City. The degree to which adverse environmental impacts are mitigated will play a significant role in assessing consistency of the alternative selected for implementation with the County General Plan.	018

If you have any questions or concerns regarding these comments, please call me at 527-1949, or call the persons on the attached list of reviewers at the telephone numbers indicated.

Cordially,



Richard C. Rogers, AICP
Planner III

COMMENTS ON DRAFT EIR/EIS

Page	Comment	
2-30 (DTPW & PRMD)	<u>Location of Pipelines in Rights-of Way Adjoining Wetlands.</u> The fourth paragraph of Mitigation Measure 2.2.5 should be rewritten for clarification. It may be interpreted to require that pipelines be within 10 feet of roadway centerline when wetlands parallel the road. This would avoid the wetland impact, but could cause an unnecessary traffic impact. In discussing this with Mr. Hauge of HBA, the intention of the mitigation was to avoid wetland impacts by placing the pipelines within the pavement or disturbed area of the road.	019
	The mitigation measure should be re-written as follows: "Where potential jurisdictional wetlands and waters of the United States or riparian areas parallel existing roadways and no bridge or culvert structure is crossed, pipeline construction activities shall be confined to the <u>disturbed areas within the right-of-way (i.e., the pavement, shoulder, or ditch)</u> or nearby suitable upland location, and shall not be located within wetlands or other sensitive biological resource areas. Further, all reasonable efforts shall be made to locate the pipeline so as to minimize the impact on traffic flow and pavement."	
3.3-37 (PRMD)	<u>Diameter of Geysers Pipeline.</u> In the "Transmission Pipelines" section, the diameter of pipelines to the Geysers is described as 48 inches. But in the Geologic Section, the transmission pipeline is described as being 42 inches in diameter. Is this an error, or does it reflect changes in pipeline size over different portions of the route?	020
3.4-1 (PRMD)	<u>Value of Reclaimed Water.</u> In the third paragraph, failure of the EIR/EIS to include reasonable estimates of the value of reclaimed water to farmers or steam plant operators at the Geysers may result in an overstatement of the costs of these alternatives relative to others. While it may not be possible to set a firm value for the reclaimed water, the EIR/EIS could provide an estimate - or range of estimates - so the potential impact of reclaimed water sales on the total cost of various alternatives could be roughly approximated. Possible overstatement of the costs of the irrigation alternatives may discourage selection of either of these alternatives. In addition, if user costs are ever proposed for implementation, they would change the analysis of the agricultural impacts of project alternatives.	021
4.1-21 (PRMD)	<u>Status of Geothermal Resources Management Plan (GRMP).</u> Under the land use section on page 4.1-21, the Sonoma County Geothermal Resource Management Plan (GRMP) is discussed. This document has never gone beyond a preliminary draft format, and should be deleted from this discussion, and elsewhere in the EIR/EIS.	022
4.1-23 to 4.1-39 (PRMD)	<u>Land Use Significance Criteria.</u> The discussion of significance criteria used in addressing land use impacts begins with the statement "Potential land use impacts may occur if the Project results in a change in land use..." However, the actual significance criteria used to evaluate this Project do not mention changes in land use, but only whether Project components are consistent with the land use map of the relevant General Plan. It seems clear that various Project options, particularly the reservoirs (up to 1,100 surface acres) and pump stations, represent significant changes in existing land uses, and that those changes may have significant effects. The following criterion should be added to all Impact Tables in Section 4.1: "Will the Project result in a change in existing land use?" Where such land use changes will occur, potential impacts and mitigation measures need to be identified.	023

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- 4.1-27 to 4.1-29 (PRMD) Consistency with County General Plan. The EIR/EIS notes that numerous "agricultural reservoirs and ponds" have been approved in agricultural areas, although they are "considerably smaller" than those proposed by this Project, which range in size from 250 (Lakeville) to 1,100 (Tolay Extended) surface acres. The typical agricultural ponds approved by the County in the past involve only a few acres, are generally contained to one privately-owned parcel, and generally provide water to agricultural activities on the parcel. In contrast, the storage reservoirs proposed in the EIR/EIS are much larger, would be publicly owned, would generally inundate all or portions of more than one parcel, and are primarily for the purpose of storing reclaimed water prior to distribution for irrigation of large areas encompassing many parcels. In general, the Sonoma County General Plan designates very large government-owned public facilities as "Public/Quasi-Public."

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A determination of consistency with the General Plan for the proposed storage reservoirs requires the balancing of several General Plan policies. For example, Policy AR-4a states: "The primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services and visitor-serving uses," while Policy RC-3D states: "Continue to encourage the construction of wastewater disposal systems designed to reclaim and reuse treated wastewater on agricultural crops, and for other irrigation and wildlife enhancement projects."

The EIR/EIS should address consistency with these and related policies. However, a General Plan amendment may be necessary to enable the selected project.

- 4.1-36 to 4.1-37 (APOSD) Open Space Impact of Alternative 4: Geysers Recharge. This alternative would construct a series of four pump stations, two 1,000,000 gallon storage tanks and distribution pipelines generally within the Pine Flat Road right-of-way, northeast of Healdsburg. The EIR/EIS correctly states that the construction of Pump Station G-3 along Pine Flat Road is located on property for which the District holds a conservation easement. The District holds a conservation easement over the 3,052-acre McCord Ranch. The McCord Ranch contains scenic agricultural resources visible from the Alexander and Knight's Valleys and a rich diversity of plant communities and wildlife habitat. Little Sulphur Creek and Mayacamas Creek, designated riparian corridors in the County Open Space Element, extend through the property along Pine Flat Road.

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Construction activities associated with the Geysers Recharge Alternative would result in a permanent loss of open space. The EIR/EIS proposes to mitigate this significant impact by providing funding to the APOSD for the "replacement on a one-for-one basis of existing acreage in the McCord conservation easement...to allow purchase of easements in comparable areas." The APOSD has not recommended this mitigation measure or the specific open space replacement ratio utilized in the EIR/EIS. This mitigation measure assumes that lands protected by conservation easement are uniform in their open space character and natural resource value. Please provide a basis for the conclusion that a "one-for-one" replacement of open space acreage is an appropriate mitigation in this case. If "one-for-one" replacement remains as the sole mitigation for this impact without appropriate documentation, then the loss of open space should be rated as "significant before and after mitigation."

- 4.2.15 (PRMD) Cancellation of Williamson Act Contracts. The EIR/EIS cites the six criteria used in assessing requests for cancellation of Williamson Act contracts. However, it presents no documentation that studies which fulfill Criterion 6 have been conducted. This criterion states that there should be "no nearby, uncontracted land available and suitable for the

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proposed use." Such documentation will be required prior to cancellation of Williamson Act contracts, and should include:

1. Identification of other sites considered for reservoirs that are not under Williamson Act contract.
2. Site specific reasons why other, alternative sites are not feasible.
3. Alternative sites for smaller reservoirs (such as the Gallo project outside Cotati), which could be sized to meet on-site water needs only.

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| 4.2-25
(PRMD) | <u>Metals Loading.</u> Table 4.2-12 shows that buildup of metals in soils irrigated by treated wastewater would not exceed levels specified in State or EPA Rules for at least 800 years, with Cadmium as the first metal to exceed the Rules. (Note: Chromium would exceed the Rules in 80,400 years). However, a 1993 EIR prepared for the Forestville-Graton Wastewater Facilities Improvement Project states: "Using typical metals concentrations for municipal wastewater and a maximum irrigation rate of 4 acre-feet per year, the soil loading limit for a site irrigated with treated wastewater would be reached in a minimum of 208 years with chromium as the limiting factor." Given that the Forestville-Graton proposal was for tertiary treatment of wastewater from a much smaller and less industrialized area, how can the 208-year estimate be reconciled with the 80,400-year estimate? | 027 |
| 4.5-22
(PRMD) | <u>Use of Draft Regulations.</u> The significance criterion for groundwater impacts involving local wells references draft regulations, in which up to 20% dilution of local well water with reclaimed wastewater is apparently allowed. However, the EIR/EIS does not analyze this issue in sufficient detail. The EIR/EIS indicates that in 84 wells near proposed reservoirs, over time periods ranging from 5 to 166 years, 20% or more of the water will consist of treated wastewater. The graphics supplied in the EIR/EIS depict only the "20% Contribution Line." Clearly, other lines could be drawn which would show areas with 0-19% "contribution." The EIR/EIS should show these areas, explain the current regulations regarding acceptable levels of dilution of well water by reclaimed water and document its basis for using the 20% factor as the basis for a significance criterion. The EIR/EIS should also explain how the presence of reclaimed water will affect drilling of wells in the future, and indicate whether there are any feasible means of avoiding this impact. | 028 |
| 4.5-25
(PRMD) | <u>Quality of Groundwater Near Reservoirs.</u> In the first paragraph, the EIR/EIS states that nitrate in reservoir water "can be converted to ammonia," and that "the groundwater impacts evaluation assumed that nitrate levels would not be reduced by conversion to ammonia, because drinking water standards for nitrate are the primary concern for groundwater." This may be true, but we are interested in changes in the level of ammonia that can be expected to occur in wells near reservoirs. Your quoted assumption makes it appear that the EIR/EIS does not evaluate this issue. Can you describe the changes in nitrate and ammonia levels and assess potential effects on human health resulting from ingestion of reclaimed water which contains increased levels of both nitrates and ammonia? | 029 |
| 4.5-32
(PRMD) | <u>Inundation of Existing Wells.</u> Any wells that will be inundated by reservoirs must be properly abandoned under permits from the Well and Septic Section of PRMD, in order to prevent water channeling down the abandoned well shaft into underground aquifers. We request that the Final EIR/EIS incorporate this action as a mitigation measure. | 030 |

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4.5-32 to 4.5-33 (PRMD)	<u>Replacement Sources of Water Within the "20% Contribution Zone."</u> Wells within or near this zone are proposed for abandonment due to high nitrate levels coming from reclaimed water stored in reservoirs. An alternative to complete abandonment would be conversion to agricultural or irrigation use only. All abandonments must have permits from the Well and Septic Section of PRMD. Proper separation distances must be observed during construction of trenches for the potable water lines and the reclaimed water lines as indicated in the 1995 California Plumbing Code, Title 24, Part 5, Sections 609.2 and 720.0. In lieu of a piped-in water supply, the City may wish to consider construction and operation of Small Community Water Systems. Permits would be required from the California Department of Health Services or the County Department of Health Services, depending on the number of connections.	031
4.6-53 (PRMD)	<u>County General Plan Policy Regarding Wastewater Reuse.</u> The summary of Sonoma County General Plan policies in Table 4.6-26, which reads: "Encourage the construction of wastewater disposal systems designed to reclaim and reuse treated wastewater on agricultural crops, and which minimizes discharges into natural waterways to protect water quality," is incomplete. The full text of Policy RC-3e reads: "Encourage wastewater disposal methods which minimize reliance on discharges into natural waterways. If discharge is proposed, review and comment on projects and environmental documents and request that projects maximize reclamation, conservation and reuse programs to minimize discharges and protect water quality and aquifer recharge areas." The EIR/EIS should address the consistency of project alternatives with this policy, Plan consistency should be added as a "Point of Significance" on page 4.6-54, and assessed in the impact tables beginning with Table 4.6-30 on page 4.6-77.	032
4.6-67 & 4.6-89 (PRMD)	<u>Runoff of Reclaimed Water to Creeks and Estuaries.</u> On page 4.6-85, the EIR/EIS states that the maximum rate of expected surface runoff is 0.1 cubic feet per second (cfs) for 12 hours, and states: "because of the small amount of flow and the short duration...the impact on creek water quality will be less than significant." But in the discussion of the impacts of Alternative 3: West County Reclamation on page 4.6-89, the EIR/EIS states "[In the] Americano Creek and Stemple Creek Agricultural Irrigation Areas...salinity, ammonia, dissolved oxygen, planktonic algae, benthic algae and metals will be affected. Other constituents such as algal growth nutrients, individual inorganic metals (eg. chloride) and organic compounds (eg. naturally occurring organic acids) will also be affected in the esteros." This discussion concludes with the statement that "no feasible mitigation has been identified."	033
	The EIR/EIS should include a complete discussion of the rates, amounts, timing and manner in which reclaimed water will find its way into existing creeks and estuaries.	034
	The discussion should include a resolution of the apparent conflict between the statements regarding water quality impacts of agricultural irrigation.	035
4.7-12 (PRMD)	<u>Viruses in Treated Wastewater.</u> The introduction to this Section on Page 4.7-3 identifies viruses as a constituent of treated wastewater. However, the description of "Biological Constituents" on this page does not mention viruses. Is this because viruses are tracked solely through use of fecal coliform levels as an indicator, and that the actual types and amounts of possible viruses are only inferred? Please expand this discussion to:	036
	1. Clarify the manner in which monitoring for viruses occurs,	037

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	2. Provide documentation of results regarding actual types and amounts of viruses found.	038
	3. Recommend feasible mitigation measures for any environmental effects identified.	039
4.7-23 (PRMD)	<u>County General Plan Goal on Water Supply.</u> The summary of General Plan Goal RC-3, which reads: "Provide an adequate long-term supply of water for domestic use," is incomplete. The full text of RC-3 reads: "Conserve, enhance, and manage water resources, protect their quality, and assure an adequate long-term supply of water for domestic, fishing, industrial and agricultural use." Plan consistency should be added as a "Point of Significance" on page 4.7-25 and subsequent impact tables should evaluate the consistency of Project options with the General Plan goal.	040
4.7-42 (DHS)	<u>Pipelines and Hazardous Waste Sites.</u> In Table 4.7-13 and the subsequent discussion, the EIR/EIS establishes a 500-foot separation as the standard for determining whether workers could potentially be exposed to hazardous materials from a known hazardous waste site. Five hundred feet may not be adequate in a case where a contamination plume is moving or has moved down gradient. In such a case, the City should employ pipe construction techniques to ensure that the piping does not create a conduit for further dispersion of the contaminant. In addition, there is a slight possibility that an unknown hazardous waste site will be discovered during pipeline construction. If this happens, the EIR/EIS should outline protocols for dealing with the situation. The Final EIR/EIS incorporate mitigation measures that address these issues.	041
4.7-47 (PRMD)	<u>Mitigation of Groundwater Nitrate Contamination.</u> Please address the possible growth-inducing effects of providing an alternate water supply to uses subject to contamination in the vicinity of wastewater reservoirs. What will be the criteria for eligibility for the alternate water supply? Will the alternate supply accommodate possible second dwelling units or farm worker/farm family units? Will the availability of City water at remote locations induce growth in these areas? The extension of water service outside Urban Service Boundaries is addressed by County General Plan Policy PF-1d, which states: "PF-1d: Avoid extension of sewer or water service outside of a sphere of influence or urban service area. Consider exceptions to this policy only: 1) where necessary to resolve a public health hazard resulting from existing development, or 2) where a substantial overriding public benefit authorized by policy OS-1c or OS-2c on pages 178 and 181 would result, unless LAFCO has adopted a "no annexation" policy. 3) Water service only may be approved for a property which is located within a water district boundary in existence as of March 1989."	042
4.8-72 (PRMD)	<u>Roadside Trees.</u> The significance criteria appear to be too narrowly focused to assess all pipeline impacts to roadside trees. Under criteria 4 and 5 it would be a significant impact to remove sensitive wildlife habitat and plant communities, including trees protected by County Zoning Ordinance. However, there may be instances where trees or shrubs do not fall under these criteria, and yet constitute a significant local resource whose removal would	043

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result in a significant effect. The County requests addition of a new significance criterion reading as follows: "Will the project cause loss of trees or groups of trees and shrubs that have local significance, based on type, location, condition or age?" 043 (cont.)

In addition, we recommend incorporation of the following mitigation measures into the mitigation program for all pipelines and pump stations: 044

1. Pipeline alignments will be designed to minimize damage to roadside trees by placing pipes within the disturbed area of the road (i.e., pavement, shoulder, or ditch) when practical. 045

2. Construction plans will identify trees that are to be removed by the project. Construction contracts will prohibit removal of other trees and shrubs within the right-of-way. 046

3. Construction specifications will prohibit stockpiling materials or parking equipment on undisturbed ground within driplines of trees within the right-of-way. 047

4. When it is necessary to prune branches or roots of trees within the right-of-way, the pruning shall be done in accordance with accepted arboricultural practices, including the pruning standards published by the California Department of Forestry (Coast Region). 048

5. When it is necessary to remove or seriously damage roadside trees to install a pipeline, the project proponent shall plant replacement trees at suitable places within or adjacent to the right-of-way. The requirement for planting will be determined when the construction plans are submitted to the County as part of the encroachment permit application process. Species, sizes, planting locations and maintenance will be determined by the County. 049

4.8-84 (PRMD) Sensitive Wildlife Habitats in Pipeline Corridors. Table 4.8-9 indicates that the first eight alternative corridors all impact exactly the same acreage of coastal oak woodland and montane hardwood. Please explain why all alternatives have the same impact. 050

4.8-87 (PRMD & APOSD) Baseline Acreage and "Points of Significance." We note that all project options have facilities that are primarily located in Sonoma County, with Marin County affected to a much lesser degree. Using the combined acreage of plant communities in both counties to assess project impacts can mislead the reader by suggesting that impacts resulting from construction of reservoirs and other facilities are evenly distributed across both counties. Therefore, we recommend that all "points of significance" based on combined acreage be revised to indicate the degree of each impact on the resources of each county. 051

4.8-88 to 4.8-89 (APOSD) Open Space and Biotic Resource Impacts of Alternative 3A: Two Rock Storage Reservoir. The Two Rock storage reservoir proposes to dam a natural drainage (Stemple Creek) with an earth-filled embankment dam to hold approximately 14,100 acre feet of water. The Final EIR/EIS should acknowledge that the area proposed for construction of the Two Rock Reservoir - the Button Ranch Watershed - was formerly owned by the University of California. This unique watershed has been identified by University of California researchers as containing a broad diversity of terrestrial and aquatic species and biotic communities. Over 400 plant species are found in the area, including 53 native grass species, 25 of which are native perennials. The site includes the headwaters of Stemple Creek, which provides

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	habitat for the California Freshwater Shrimp and drains into the Esteros de San Antonio and Americano.]	051 (cont.)
	The discussion under Impact 8.5.1 of the EIR/EIS concludes that various storage reservoirs require no mitigation of impacts on CNPS Class 2, 3 or 4 terrestrial plant species because affected plant communities comprise "less than 15% of known occurrences in populations in Sonoma and Marin Counties." The Two Rock storage reservoir would result in a 10% loss of known populations of the <i>Bristly linanthus</i> , a CNPS category 4 species. The threshold of significance in this case, which allows a 15% loss of all habitat in both counties without a finding of significant impact, seems questionable. Please explain the rating in light of CEQA Guidelines Section 15065 (a).]	052
	In the absence of mitigation, the impact of the Two Rock storage reservoir should be rated as "significant and unmitigated."]	053
4.8-117 (APOSD)	<u>Cumulative Impacts on Plant Communities.</u> In the discussion of Impact 8.4C, the EIR/EIS states that the project would result in a cumulative loss of 3,400 acres of sensitive plant communities, primarily from the construction of storage reservoirs (Table 4.8-13). We question the conclusion drawn (Pg. 4.8-117) that a cumulative loss of up to 25 percent of existing habitat in Sonoma and Marin Counties should not be considered a significant impact. We recommend that the impact be rated as "significant before and after mitigation," unless new mitigation measures are developed and included in the Final EIR/EIS.]	054
4.8-117 to 4.8-118 (APOSD)	<u>Sensitive Plant Relocation Program.</u> We question the feasibility and effectiveness of the Sensitive Plant Relocation Program as mitigation for plant species with such limited distribution. Please comment on the effectiveness of similar programs known to the City or the consultant, and revise Mitigation Measure 2.4.15 to add: "Mitigation sites shall be chosen based on their ability to sustain displaced species over the long term."]	055
4.9-69 (PRMD)	<u>Steelhead Trout at Carroll Road Reservoir.</u> In the analysis of Impact 9.5.7 the EIR/EIS states that one steelhead trout was found in the Carroll Road storage reservoir site, and that its origin was "unknown." Although this is not known as a "major corridor" for steelhead trout, aren't additional sampling and studies warranted to determine the significance of this stream as steelhead habitat?]	056
4.10-37 to 4.10-38 (PRMD)	<u>Sensitive Resource Conservation Program.</u> The Program should be incorporated into the Final EIR/EIS and implemented. However, are concerned that the cumulative impacts of several alternatives on small-area ecosystems cannot be effectively mitigated with proposals for replacement habitat and vegetation. We recommend that the "Conservation Program" include preparation of a adopted plan for each ecosystem affected, if the selected alternative adversely affects wetlands.]	057
4.11-1 (DTPW)	<u>General Comment on Pipeline Routes and Roads.</u> Four of the five disposal alternatives addressed in the EIR/EIS involve extensive heavy construction activity of County roads. For a more typical project, the DTPW would review proposed construction routes in site-specific detail in order to ensure that the project is approved with appropriate mitigation measures. However, in this case it is not feasible to undertake a detailed review of all possible routes, since only one option will be selected for construction. For this reason, it is essential that the mitigation program for roads include a phase for specific and detailed consultation with DTPW staff regarding site-specific details of the selected route. This consultation must	058

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	occur prior to the preliminary design stage, and prior to investment of significant funds in detailed construction drawings.]	058 (cont.)
	The County also notes that all mitigation measures proposed by the City and the Consultant in the DEIR are appropriate and necessary. We request that the City include all these programs in the Final EIR/EIS, but recognize that site-specific details of the Mitigation Program for the selected route remain to be determined, and may exceed the mitigation noted by the City and the Consultant, including in some cases road reconstruction, overlays and mitigation of deterioration of off-pipeline route roads by heavy equipment.]	059
4.11-1 (DTPW)	<u>Ownership of Rights-of-Way.</u> The right-of-way of some public roads is not owned in fee title. The prescriptive rights are for roads, and may not allow use of a road as a pipeline route without acquisition of an easement.]	060
4.11-8 (DTPW)	<u>Status of Roadway Bridges in Transportation Analysis.</u> The routing employed for the various alternatives includes roads with bridges. Will all bridge crossing situations be addressed with "jack and bore" methods, or will some bridges carry pipeline? If bridges are affected, either by pipeline or by carrying heavy construction vehicles, the EIR/EIS should identify them and mitigate any adverse impacts.]	061
4.11.10 (DTPW)	<u>Public Transit Impacts.</u> Sonoma County Transit has identified eight road segments on which construction of Alternatives 2, 3, 4 or 5 could affect public transit services. There are 21 affected routes, which are listed in Table 4.11-2 on page 4.11-15. While Sonoma County Transit anticipates that significant time delays could result from construction along these routes, we cannot identify any feasible mitigation measures which would eliminate such delays. Where possible, we will implement minor route deviations and/or timetable adjustments to reduce any time delays due to construction. We request adequate notification of construction time schedules for all affected roadway segments in order to prepare for possible route deviations or schedule adjustments. We also request that such notification be included as a mitigation measure in the Final EIR/EIS.]	062
4.11-10 to 4.11-13 (DTPW)	<u>Correlation between Table 4.11.1 and Maps.</u> On page 4.11.11, Old Redwood Highway north of Railroad Avenue is indicated as being affected, but the map (4.11.1c) shows that the actual affected segment is south of Railroad Avenue. On the same page of the table, Petaluma Hill road north of Railroad Avenue is indicated as being affected, while the map shows the actual affected segment is north of Adobe Road. The table also identifies Highway 116 east of Stony Point Road as an affected segment, while the map shows the affected area to be west of Highway 116. Finally, the map identifies Frates Road as being affected, but it is not listed anywhere on Table 4.11.1. We are assuming that Maps 4.11.1a through 4.11.1c are correct, and that the roadway segment descriptions in Table 4.11.1 are incorrect. If this is not the case, we request another opportunity to review potential impacts on the roadway segments actually affected by the project.]	063
4.11-21 (DTPW)	<u>Traffic Volumes on Roads Affected by Construction.</u> In the first paragraph, the EIR/EIS states that "The affected regional roadway network (and) existing traffic volumes were used as the basis for evaluation of impacts in the Project area..." Given the long time horizon for construction of the Project, this approach does not allow for growth in traffic volumes or for construction of roadway improvements. The best way to handle this issue is to determine whether projected increases in traffic volumes, or projected road improvements, will substantially affect significance ratings of Project options.]	064

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4.11-22 (DTPW)	<p><u>Significance Point for Traffic Congestion.</u> Project alternatives involving pipeline construction would affect from 16 miles (Laguna Discharge) to 84.5 miles (Bloomfield Reservoir) of public roadway. Affected roads could include State Highways 37, 116, 121 and 128, as well as Stony Point, Lakeville and Pine Flat Roads. Periods of lane closure could last from 31 to 53 days on this routes, depending on the disposal alternative selected. The EIR/EIS states that temporary lane closures on roads are not rated as significant if the closures "comply with Standard Transportation Procedures" or last "more than one month over a one mile segment."</p>	065
	<p>The County does not agree with this standard in all cases, particularly when the road involved carries more than 10,000 average daily trips, or when there are no practical alternative routes, or where the detour route would significantly increase traffic on another road. We recommend that the Final EIR/EIS include a mitigation program for affected roadways which addresses these situations. The program should consist of a plan to minimize lane closures, ensure safe conditions, identify feasible alternative routes, and minimize secondary congestion or hazards on roads on the alternate routes. The measures contained in Mitigation and Monitoring Programs 2.2.15 (Standard Traffic Control Procedures), 2.2.17 (Maintain Maximum Number of Open Lanes on Roadways) and related measures address some, but not all of these concerns. Sonoma County requests further discussion of these issues prior to finalization of the <u>Mitigation Program.</u></p>	
4.11-27 (DTPW)	<p><u>Lane and Road Closures.</u> The County will wish to specify the length of road that may be closed at any one time, the times of the closure, and details regarding the timing and manner of excavation and restoration. This may include limiting the length of trench opened on any given day to that which may be backfilled on that same day. Conditions of approval of encroachment and construction permits will be site-specific. Please incorporate these County policies into all relevant mitigation measures.</p>	066
4.11-34 (DTPW)	<p><u>City Agreement to Restore Roads.</u> Under Impact 11.7.2-6, the EIR/EIS states: "The City has agreed to restore all roadways, public and private, to existing conditions or better..." According to page 2.53 of the Mitigation and Monitoring Program, the City is committed to the following: "within one year completion of construction, roads damaged by construction traffic or pipeline construction will be repaired to a condition equal to or better than that which existed prior to the construction activity." The City plans to identify the initial condition of roads by "survey and videotape." Our concerns include:</p>	067
	<p>1. Some of the roads shown as being affected by construction, or by construction vehicle traffic, may not in the best condition. These roads may be susceptible to damage by heavy equipment, even when not directly affected by construction trenching.</p>	
	<p>2. Heavy equipment will cause accelerated deterioration of the road surface. For example, one trip by a heavy vehicle can cause pavement deterioration equivalent to 10,000 automobile trips. In hillside areas, heavy equipment traffic can destabilize the roadbed. These effects may not be detectable by survey or video.</p>	068
	<p>3. Trenching in hilly areas can lead to destabilization of the roadway embankment if water is allowed to pass through the trench, or if the trench is not located properly.</p>	069
	<p>4. Roads damaged by construction or heavy equipment traffic, even if not on the pipeline route, may require reconstruction and/or overlay of affected road segments.</p>	070

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Please have the Consultant and the City considered these issues in formulating the mitigation program. Sonoma County requests that these issues be addressed in design of a final Mitigation Program, as requested in the comment on Page 14.11-1 above. 070 (cont.)

4.11.34 (DTPW) County Policy Regarding Recently Paved Roads. Portions of Stony Point Road that have been recently repaved have been identified as pipeline routes. The County has a policy of not allowing trenching in new pavement for a period of five years. Please note this policy in the Final EIR/EIS and develop an appropriate mitigation measure. 071

4.11.38 (DTPW) Effects of Increases in Traffic Due to Construction. Tables 4.11-10 and -11 show that some County roads will experience traffic increases ranging from 11% to 600% due to reservoir construction and hauling traffic. Much of this increased traffic will consist of large and heavy vehicles, which will greatly accelerate the deterioration of pavement along the haul routes, and which will increase traffic hazards rural County roads. In addition to the road restoration program cited above, we request that the City consider an additional mitigation program for safety and maintenance of haul routes during the time of construction. 072

Also, the EIR/EIS establishes a 10% increase in existing traffic volumes as the "Point of Significance" at which a congestion impact is created. However, heavy equipment traffic can cause road damage even when total traffic volume increase by less than 10%. Moreover, all details of the manner in which site-specific effects are mitigated cannot be determined without study of individual site circumstances prior to the preliminary design phase and prior to investment of significant funds in detailed construction drawings. The final Mitigation Program should incorporate mitigation measures that address these issues, pursuant to our comment on Page 4.11-1, above. 073

4.11.54 (DTPW) Cumulative Impact on Roadbeds. The first sentence in the analysis of Impact 11.4.C. reads: "The Project impact is significant or less than significant only in the case of a pipeline rupture." The meaning of this sentence is not clear. Moreover, cumulative roadbed damage may occur under circumstances other than pipeline rupture, and is not necessarily mitigated by the measures proposed in the EIR/EIS. For roadbeds, cumulative impact is related to the cumulative deterioration of pavement on roads used by heavy equipment. Pavement life has a fixed number of heavy vehicle trips in it. Each trip by a heavy vehicle reduces that amount of life remaining in the pavement. Some of the roads proposed for use under the various alternatives will have all, or a significant portion, of their pavement life used up as a result of construction activity. The Mitigation Program needs to make explicit provision for this type of impact, particularly given that the County has insufficient funding to maintain roads in their current condition. The final Mitigation Program should incorporate mitigation measures that address these issues. 074

4.13-10 (PRMD) County General Plan Policy Regarding Noise. The full text of the County General Plan Policy NE-1C - the key Plan policy on noise issues - should be cited in the EIR/EIS: Policy NE-1C reads as follows: 075

"NE-1c: Control non-transportation related noise from new projects. The total noise level resulting from new sources and ambient noise shall not exceed the standards in Table NE-2 as measured at the exterior property line of any affected residential land use. Limit exceptions to the following:

- 1) If the ambient noise level exceeds the standard in Table NE-2, adjust the standard to equal the ambient level.

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2) Reduce the applicable standards in Table NE-2 by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. 075 (cont.)

3) Reduce the applicable standards in Table NE-2 by 5 decibels if they exceed the ambient level by 10 or more decibels."

Subsection (3) above appears to be applicable to most rural pump station locations. Therefore the nighttime limit on noise is 40 dBA, rather than the 45 dBA shown in Table 4.13-4. See comment on Pages 4.14-40 to -41, below.

4.13-13 to 4.14-14 (PRMD)	<u>Construction Noise Measurement.</u> Under the sections dealing with construction noise and airblast, we request an explanation of where and how such noise will be monitored. What action will be taken if noise levels are found to exceed those anticipated in the EIR/EIS?	076
4.13-18 (PRMD)	<u>Noise Evaluation Criteria.</u> In Table 4.13-8, the measurement method in the first line of column one refers to either the "property line" or the "yard line." The text does not describe the meaning of these terms, or explain the circumstances under which each will be used. Please provide additional detail.	077
4.13-21 (PRMD)	<u>Location of Sensitive Noise Receptors.</u> The EIR/EIS text states that "...the pump noise at future sensitive receptors was calculated for a distance of 10 feet from the pump stations. This is the minimum required distance from the future building structure to the property line, per County zoning code." This standard appears to understate likely setbacks for new structures, including pump stations, and may have led to some degree of overstatement of pump station noise impacts. It is true that the minimum County zoning setback for new structures in most rural zoning districts is 10 feet (for side yards). However, the same setback would be applied to pump stations, if located in a rural zoning district, leading to a minimum separation of 20 feet between new residences and proposed pump stations. Misinterpretation of this minimum setback may also have affected the EIR/EIS's discussion of construction noise impacts.	078
4.13-27 to 4.13.40 (PRMD & DHS)	<u>Construction Noise Mitigation.</u> We recommend the following additional measures to reduce construction noise impacts, and request their incorporation into the Final EIR/EIS: 1. Sensitive noise receptors should be specifically identified and notified to keep windows and doors closed during peak construction activity.	079
	2. Sensitive receptors should be notified when blasting will be conducted and instructed as to actions necessary to reduce noise impacts.	080
	3. Other methods may provide better noise attenuation on temporary construction sites than vinyl sheet lining, which would probably be less than effective for noise reduction.	081
	4. A noise consultant/engineer should design and monitor the temporary construction noise barriers used, otherwise any gaps or inadequate materials may increase noise impact by channeling, or fail to result in any noise mitigation. These additional measures could be added to the Construction Noise Control Measures listed in Section 2.4.9.	082

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4.13-40 to 4.13-41 (PRMD & DHS)	<u>Mitigation of Noise From Pump Station Operation.</u> The SCWA currently operates pumps that range up to 1,250 horsepower, and has not detected noise levels nearly as high as those projected for the pump stations in the EIR/EIS (see attached table). Can you explain the apparent discrepancy in noise impacts between SCWA pumps and those assessed by the EIR/EIS?	083
	In addition, we recommend the following additional measures to reduce noise associated with pump station operation, and request that they be included in the Final EIR/EIS:	084
	1. A noise engineer should develop noise mitigation measures to meet the nighttime maximum exterior noise level of 40 dBA. This standard considers the rural ambient noise level throughout Sonoma County and reflects a 5 dBA reduction in the normally acceptable maximum County standard of 45 dBA, as specified by Policy NE-1C (3) of the Sonoma County General Plan.	
	2. Locations of the pump stations should be carefully considered, and placed as far away from any sensitive receptors as is feasible, especially in rural areas.	085
4.14-36 (PRMD & APOSD)	<u>Open Space Impacts of Reservoirs.</u> Table 4.14-6 summarizes visual impacts of reservoir options. It appears that the Sears Point, Tolay Extended, Tolay Confined, Adobe Road, Sears Point, Two Rock, Valley Ford, Bloomfield and Carroll Road Reservoirs will have significant, unmitigated, long-term effects on Scenic Landscape Units and/or Scenic Corridors designated in the Sonoma County General Plan. These impacts raise the issue of whether these facilities can be found consistent with the General Plan. However, we question why the EIR/EIS does not mention long-term open space preservation as a potential mitigation measure. Permanent preservation of designated open space in the vicinity of reservoir sites would be a significant factor in assessing the overall General Plan consistency of any reservoir component selected for implementation, particularly in view of General Plan Policy PF-1d.	086
4.14-83 (PRMD & APOSD)	<u>Open Space Impacts of Pump Stations.</u> Pump station impacts are of two types: impacts associated with power lines needed to serve the stations, and impacts associated with the pump station buildings. The building impacts would be mitigated to the point of insignificance by undergrounding of the station structures, which is a recommended mitigation measure for noise impacts. This section of the EIR/EIS should address the use of undergrounding as a mitigation measure for open space impacts.	087
4.14-87 (PRMD)	<u>Light and Glare Impacts of Pump Stations.</u> Light and glare impacts are dismissed after stating that shielded low intensity lights would be used, and that the lights would only be used "as needed" and not operated continuously. We request that these measures become mitigation measures for the project, and included in the lists and descriptions of mitigation measures in Chapter 2.	088
4.14-92 (PRMD)	<u>Visual Impact of Highway 128/Pine Flat Road Pump Station.</u> Another location, perhaps up Pine Flat Road and away from the middle of the Alexander Valley Scenic Landscape unit and the Highway 128 Scenic Corridor should have been considered to mitigate the visual impact described in the EIR/EIS. In the absence of suitable mitigation, placement of a pump station at this site may not be consistent with the Open Space Element of the County General Plan.	089

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4.14-92 to 4.14-93 (PRMD & APOSD)	<u>Open Space Effects of Pump Station Fuel Tanks.</u> Several pump stations require large fuel tanks which would result in open space impacts due to height (up to 50 feet). Could these impacts be avoided or mitigated by fully or partially burying the tanks, or by using tanks of the same capacity which are not as high? The tanks should be located and designed to reduce the impacts identified in the EIR/EIS by using either or both of these measures. These measures would also help ensure consistency with the Open Space Element of the County General Plan.	090
4.14-102 (APOSD)	<u>Cumulative Open Space Impacts of Alternative 4: Geysers Recharge.</u> The discussion of Alternative 4 should address the cumulative open space impacts on the total area encumbered by the Geysers Recharge project. The EIR/EIS discusses only the potential impacts of the pump station construction on open space and not the impacts on open space from construction and future use of all Geysers Recharge-related facilities (storage tanks, pipelines, and pump stations, etc.) (Pages 1-25 and 3.3-41). In addition, the District requests that the EIR/EIS state whether Alternative 4 would impact the District's Santa Angelina conservation easement, which is contiguous to the eastern boundary of the McCord conservation easement.	091 092
4.15-16 to 4.15.18 (PRMD)	<u>Lack of Cultural Resources Field Studies.</u> Cultural resources field studies were not conducted for pipeline routes and irrigation areas. The EIR/EIS states that detailed studies will be conducted after selection of the preferred alternative. This approach to mitigation may not be adequate under CEQA unless this EIR/EIS includes performance standards.	093
4.18-24 (PRMD)	<u>Pipeline Routing for Alternative 4: Geysers Recharge.</u> Please explain the reasoning behind the high costs of the Geysers reinjection alternative. Although it is understood that the pipeline route analysis was limited to existing public rights-of-way, this limitation may have skewed the cost and affected conclusions regarding impacts of the Geysers Recharge alternative by adding miles to the length of the pipeline. In the case of this alternative, a more direct route could be much less expensive, both in terms of capital costs and pumping costs. Please explain why a more direct route was not considered for this project option, and estimate the scale of any cost savings that might result from use of a more direct route.	094

Noise Levels For Some Existing Agency Facilities

SITE	TODD RD. WELL	SEBASTOPOL RD. WELL	SONOMA BOOSTER	FORESTVILLE BOOSTER #2	ELY RD. BOOSTER	COL. WELL #1&2	COL. WELL #3	COL. WELL #5
AMBIENT LEVEL	35 dBA	42 dBA	52 dBA	44-52 dBA	54 dBA	approx 50 dBA	approx 30 dBA	approx 25- 30 dBA
READING 1 (DISTANCE)	77 dBA (2-3 feet)	77 dBA (2-3 feet)	85 dBA (inside building)	54-55 dBA (2-3 feet)	73 dBA (2-3 feet)	72-74 dBA (2-3 feet)	74 dBA (inside housing)	64 dBA (inside housing)
READING 2 (DISTANCE)	60 dBA (25 feet)	65 dBA (25 feet)	66 dBA (10 feet)	48 dBA (10 feet)	63 dBA (25 feet)	56-58 dBA (300 feet)	62 dBA (10 feet)	56 dBA (2-3 feet)
READING 3 (DISTANCE)	52 dBA (100 feet)	54 dBA (100 feet)	57 dBA (50 feet)	33-37 dBA (at property lines)	58 dBA (100 feet)	50-55 dBA (600 feet)	46 dBA (45 feet)	53 dBA (10 feet)
READING 4 (DISTANCE)	37 dBA (300 feet)	44 dBA (220 feet)			52 dBA (200 feet)		37 dBA (100 feet)	33 dBA (45 feet)
READING 5 (DISTANCE)							33 dBA (200 feet)	25 dBA (100 feet)
SIZE OF PUMPS	200 hp	450 hp	285 hp	two 30 hp	500 hp	two 1,000 hp	two 1,250 hp	two 1,250 hp
TIME OF READINGS (DATE)	8:45-9 a.m.	9:30-9:45 a.m.	1:30 p.m.	9:30-10 a.m.	7:45-8 a.m.	(5/73 and 7/73)	9-10 a.m. 5/10/95	8:30-9 a.m. (5/30/95)
WEATHER	foggy	foggy		cloudy	foggy		overcast	clear/calm

I N T E R

O F F I C E

MEMO

To: City of Santa Rosa and HBA
From: Richard C. Rogers, Sonoma County PRMD
Subject: Contact Persons, Sonoma County Comments on Draft EIR/EIS
Date: October 4, 1996

Following is the list of persons to call if you questions regarding County comments on the Draft EIR/EIS for the Santa Rosa Subregional Long-Term Wastewater Project:

Permit and Resource Management Department: Richard Rogers, 527-1949.

Department of Transportation and Public Works:

Roads: John Kottage, 527-2231

Transit: Steve Schmitz, 585-7516

Agricultural Preservation and Open Space District: Andrea Mackenzie, 524-7360

Department of Health Services: Donald L. Smith, 525-6565

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**Sonoma County Water Agency Comments on the Santa Rosa Subregional
Long-term Wastewater Project Draft EIR/EIS
October 3, 1996**

Public Health and Safety Impacts

The occurrence of pathogens in the Russian River and potential sources of pathogens are of primary concern to the Sonoma County Water Agency (Agency) because of their potential affect on water produced by the Agency's Ranney Collector wells and how the Agency's water is regulated in the future. The Agency's has specific concerns regarding the public health impacts of Discharge Alternative 5A (Russian River discharge), which would move the existing point of discharge at the Laguna de Santa Rosa to a point on the Russian River just upstream of the Agency's existing collector wells. The distance and travel time from the existing Laguna discharge point to the Agency's collector wells mitigates many of the potential public health impacts of treated wastewater discharges, and Discharge Alternative 5A would largely eliminate this effect.

In addition, the Agency offers the following specific comments on the discussion of Alternative 5A in the Public Health and Safety chapter and the corresponding appendix in the Draft EIR/EIS:

Sub-appendix F to Appendix J-3 (Human Health Risks from Chemical and Biological Components of Reclaimed Water) discusses the ability of the city's chlorine disinfection process to inactivate *Giardia*, apparently based on the detention time achieved in the chlorine contact chamber at the Laguna Treatment Plant. The inactivation analysis is based on criteria contained in the existing Surface Water Treatment Rule. The estimated occurrence of *Giardia* and *Cryptosporidium* in Appendix J-3 is based on four sampling events over a three month period in 1994. This sampling detected no *Cryptosporidium* and a maximum *Giardia* concentration of 13.8 cysts/100 L. However, subsequent sampling conducted from May to September of 1996 at the Laguna Treatment Plant has detected both *Giardia* and *Cryptosporidium* in plant effluent. We feel that additional sampling should be collected which represent the full range of seasonal operating conditions before drawing conclusions about the occurrence of these pathogens in treated wastewater.

Of greater concern to the Agency is the fact that the analysis for Discharge Alternative 5A does not discuss the effectiveness of the treatment process for *Cryptosporidium*, which are far

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

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more difficult to inactivate than *Giardia*. Although no *Cryptosporidium* were identified in the four samples above, they were detected in the samples collected in 1996. We believe that the analysis for Discharge Alternative 5A should also address the ability of the treatment process to remove or inactivate *Cryptosporidium*. In addition, we also understand that the disinfection process at the Laguna Treatment Plant may be changed from chlorine to ultraviolet disinfection (UV) in the near future. The analysis should also discuss the effectiveness of UV disinfection for *Giardia* and *Cryptosporidium* inactivation.

As discussed in Appendix J-3, one of the Sonoma County Water Agency's five Ranney collector wells, Collector Well No. 5, is characterized as being under the direct influence of surface water for the purposes of the Surface Water Treatment Rule. Collector Well Nos. 1 to 4 are not considered to be under the direct influence of surface water. The Agency is currently preparing to begin sampling under the EPA's Information Collection Rule (ICR), which will provide data on the occurrence of *Giardia* and *Cryptosporidium* nationwide. Data collected under the ICR will be used to develop the proposed Enhanced Surface Water Treatment Rule (ESWTR), which is expected to be released by the EPA within 2 to 3 years. Treatment requirements under the ESWTR will be targeted at inactivation of *Cryptosporidium* because conventional chlorine disinfection has been shown to be relatively ineffective for inactivation of *Cryptosporidium*.

The Agency has serious concerns about a potential source of *Cryptosporidium* and other pathogens under Alternative 5A at a point just upstream of the Agency's collector wells. Without the mitigating effects of distance and time from the point of discharge that occur with the existing Laguna discharge, Discharge Alternative 5A has the potential to trigger requirements for greater pathogen removal rates at Collector Well No. 5, or jeopardize the "not under the direct influence of surface water" status of Collector Well Nos. 1 to 4. This risk will be even greater under the pending ESWTR. The Agency could only achieve greater removal efficiencies through additional filtration or alternative disinfection methods, either of which would be extremely costly for the Agency to implement.

In addition to the ESWTR, the EPA is presently considering the proposed Groundwater Disinfection Rule (GDR), which will apply to all of the Agency's Ranney Collector wells which are not

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considered to be under the direct influence of surface water. When issued, the rule will contain criteria for natural groundwater disinfection resulting from filtration in the aquifer, which will depend on the distance from potential contamination sources. The Agency is concerned that a discharge point directly above its collector wells, as proposed under Discharge Alternative 5A, could result in a treatment requirement which could only be accomplished by costly alternative disinfection methods.

The evaluation criteria discussed on page 4.7-28 of the Draft EIR/EIS (Evaluation Criteria with Points of Significance for Pathogenic Viruses, Bacteria and Other Disease Organisms), consider impacts to be significant if Project alternatives would cause the water quality at a domestic water intake to exceed Maximum Contaminant Levels (MCLs) for fecal coliform or *E. coli*. In light of the points discussed above, we believe this criterion is too limited to identify and fully address all potential Public Health and Safety impacts of Discharge Alternative 5A. While the treatment requirements under the ESWTR have not yet been adopted, the rule has been issued in draft form and is certain to result in additional treatment-based standards in the near future. We suggest that the criteria be expanded to also define impacts as significant if they could result in regulatory requirements for greater treatment at any downstream domestic water intake. Mitigation measures for any resulting impacts should consider the potential cost of any additional treatment.

In summary, the Agency is committed to providing its customers with the highest quality water possible and has serious concerns with Discharge Alternative 5A, which would increase the exposure of its customers to treated wastewater discharges and eliminate the mitigating effects of the existing discharge configuration. Alternative 5A would move the existing discharge to a point just upstream of all of the Agency's collector wells, which serve a population of approximately 500,000 people, and would benefit no one in terms of public health and safety.