

OCT-07-96 MON 15:53

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FAX NO. 4158274953

P. 02/04



MARIN MUNICIPAL WATER DISTRICT

220 Nellen Avenue
Corte Madera, CA 94025-1149
415-924-4600
FAX 415-927-4953

October 7, 1996

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

OCT 07 1996

Marie Meredith
City of Santa Rosa
Community Development Department
PO Box 1678
Santa Rosa CA 95402-1678

DEPARTMENT OF
COMMUNITY DEVELOPMENT

Re: Comments to Subregional Long-Term Wastewater Project Draft EIR/EIS

Dear Ms. Meredith:

The Marin Municipal Water District (MMWD) appreciates the opportunity to comment on the draft EIR/EIS for the Subregional Long-Term Wastewater Project. 001

As a preface to our comments, we wish to note that MMWD also operates a wastewater reclamation system. This has provided us with an extensive knowledge about water recycling and the regulatory and public health concerns involved with this practice. We have been extremely impressed by the innovations practiced by the Santa Rosa Utilities Department in marketing recycled water to a wide variety of urban and agricultural customers. In our opinion, the Santa Rosa Utilities Department deserves statewide recognition for their water recycling accomplishments and we wish them continued success.

General Comments on Section 4.7 - Public Health 002

The MMWD is a contractor of the Sonoma County Water Agency (SCWA) which serves as a domestic water supply to some 500,000 people. We have comments and concerns regarding this project's impact to drinking water quality from the SCWA system. All comments are generally directed at Project Alternatives 1, (No Action), 5A (Discharge to Russian River) and 5B (Discharge to Laguna). We have no comments to other project alternatives.

One of SCWA's collector wells, Ranney Collector Well No. 5, is characterized as being under the direct influence of surface water for the purposes of the Surface Water Treatment Rule. The treatment of the collector is equivalent to a well-designed and operated conventional water treatment plant and requires watershed protection in a similar fashion as other drinking water plants. Since it is the responsibility of public water systems to use the best quality water source available, any project that provides flow to the Russian River that degrades SCWA's source water quality impacts the SCWA and the people it serves.

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Marie Meradith
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The discharge upstream under Alternative 5A certainly will affect the SCWA source water. 002
Without detailed stream flow analysis and modeling through the discharge season and (cont.)
under a variety of runoff patterns any effect of Alternatives 1 and 5B on water supply can
not be determined from the material presented. |

The parallel to source water protection for the wastewater industry is the practice of waste 003
minimization and industrial pretreatment. The objective of both of these is to make steady
improvements to reduce contaminant loading and improve water or effluent quality. From
the material presented it was not possible to determine if these goals are a part of the
project and, if they are, in what way they are to be achieved. |

Giardia and Cryptosporidium

004

Both *Giardia* and *Cryptosporidium* are fecal in origin and have been regularly found in the
vast majority of wastewater effluents. Table 4.7-4 lists only four samples which also seem
to be taken in the dry season when plant flow rates are not high. This extremely limited
sample is inadequate to evaluate the impact to the drinking water supply.

The detection method used is not stated in the report. Assuming that the EPA standard 005
test was used, it is known to drastically over or under estimate the concentration of these
pathogens. Because of this, and the fact that a collector is under the direct influence of the
Russian River, we suggest that weekly testing be performed throughout the rainy (and 006
proposed discharge) season. | Consideration should also be given to using alternate testing 007
techniques, such as animal testing, which can better distinguish viability of these
pathogens. |

Based on the limited samples taken and the conclusion drawn, the report's discussion of 008
Alternative 5A did not cover the effectiveness of the treatment process for *Cryptosporidium*,
which are far more difficult to inactivate than *Giardia*. |

Inorganic and Organic Chemicals

009

There are a variety of regulated chemicals that are not completely removed by the
treatment process. The evaluation criteria listed in Section 4.7 and risk assessment
methodology uses regulated maximum contaminant levels (MCLs) to establish whether an
impact is significant. While Impact No. 7.9.1 (page 4.7-61) concludes that the impacts are
not significant, it begs the question of working to a goal of reduced contaminant loading.
Based on the goal, there at least needs to be mitigation to assure that sufficient testing and
monitoring is done so that changes in concentrations can be determined. |

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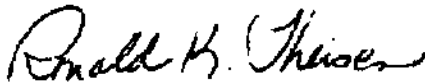
Marie Meredith
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Conclusion

010

We look forward to working with the City to address our comments. As can be seen from our comments, we oppose any project that will increase the contaminant loading and increase the health risks to SCWA's water supply source which serves 500,000 people. We are supportive of the project alternatives that reduce these risks and encourage you to act in the best long-term interest of the region and select recycling over discharge.

Very truly yours,



Ronald K. Thiesen, P.E.
Assistant General Manager / Manager of Engineering

cc: SCWA
NMWD
DOHS

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The parallel to source water protection for the wastewater industry is the practice of waste *minimization* and *industrial pretreatment*. The objective of both of these is to make steady improvements to reduce contaminant loading and improve water or effluent quality. From the material presented it was not possible to determine if these goals are a part of the project and, if they are, in what way they are to be achieved.

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Inorganic and Organic Chemicals

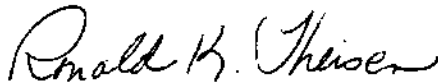
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