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**CITY OF SANTA ROSA**  
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DEPARTMENT OF  
COMMUNITY DEVELOPMENT

City of Santa Rosa:  
*SANTA ROSA SUBREGIONAL L.T. WW EIR/EIS*  
Sonoma County Water Agency

The City of Santa Rosa proposes spending over \$600,000. on a CH2MHILL contract that will inject wastewater into my drinking water system, the Aquifer. 001

I oppose this contract with CH2MHILL, who are the project consultants as well as project engineers. This project is the continuation of the ASR alternative dropped from *Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS* by Harland Bartholomew and Associates. HBA.

Third Street Project is the ASR Pilot Project for ASR. Monies from the *Santa Rosa Subregional Long-Term Wastewater Project* were used to study the Third Street site, "A Place to Play." This is a continuation of ASR component.

Harland Bartholomew and Associates state that:

**"Finally, a pilot Project for injection of reclaimed water will need to be conducted before a full-scale ASR Project could be approved."** *Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS*. HBA July 31, 1996 p. 3.1-36.

CH2MHILL would have you believe that this is merely a wastewater storage tank issue. It is not. The issue is not about the need for water.

The taxpayers paid for Warm Spring Dam and we have that water.

This Contract is about long-term wastewater disposal.

This Contract is about taking the risk of contaminating peoples water wells and the Aquifer, the groundwater our drinking water.

This contract is about replacing existing wells.

The City of Santa Rosa spent \$11 million of the people's tax monies on an EIR/EIS. By voting for this contract you are ignoring the data in your consultant's reports. The reports state that:

**"Wastewater injection into a potable aquifer and recovery from that aquifer is thus clearly not yet proven technology."** *Documentation in Support of the Elimination of Alternatives*. Parsons April 1996 p. 22.

That means ASR has never been done before! That means they are not sure what is going to happen to the injected wastewater.

**"To ensure reliability of the system it is critical that the technology be well proven and readily manageable."** *Documentation in Support of the Elimination of Alternatives*. Parsons: April 1996 p. 10.

**"A detailed evaluation of relevant water quality parameters and possible interactions with groundwater would need to be conducted in subsequent phases of the ASR program should this option be further pursued."** *Aquifer Storage and Recovery Feasibility Report Santa Rosa Long Term Wastewater Project. Parsons Jan.95 p. 2-4.* 001(cont.)

That means the Aquifer has not been mapped and chemical surprises could occur with the mixing of the waters.

**"Aquifer storage and recovery of reclaimed water is not practical due to technology constraints."** *Documentation in Support of the Elimination of Alternatives Parsons April 1996 p. 23.*  
That means that those modeling efforts have shown that the Santa Rosa aquifer characteristics are only marginally suitable for ASR.

**"The Agency (The Sonoma County Water) expressed concerns about the possibility of the City of Santa Rosa implementing an ASR project using reclaimed water in the vicinity of their water supply wells."** *Aquifer Storage and Recovery Feasibility Report Santa Rosa Long Term Wastewater Project. Parsons: Jan. 1995 p. 4-5.*

The Sonoma County Water Agency is worried about wastewater filtrating into their water and contaminating their customers drinking water supply.

The Environmental Report states:

**"Some disadvantages of injection wells include:**

- 1. ...the subsurface.... is homogeneous, moderately permeable and has a low groundwater gradient;
- 2. Require relatively high construction and operation costs;
- 3. Potential problems with clogging of the well screen and/or aquifer require maintenance;
- 4 Do not allow for filtration of reclaimed water through the unsaturated zone."

*"Aquifer Storage and Recovery Feasibility Report Santa Rosa Long Term Wastewater Project"*  
Parsons Jan.95 p. 5-2

This means that this project costs are high. The project might contaminate the groundwater and the groundwater filtration system. The Aquifer and wells may need to be cleaned or maintained which is a costly operation.

**"Clogging of portions of the aquifer could also be aggravated by changes in the native clay minerals in the well strata . . . native clay minerals to swell and locally reduce aquifer transmissivity."** *"Aquifer Storage and Recovery Feasibility Report Santa Rosa Long Term Wastewater Project."*  
Parsons Jan.95 p.7-2

That means that the flow of the aquifer could be damaged by the reaction of native clay areas and the injected wastewater.

**"Additional treatment for reclaimed water may be required by USEPA before injection**

**wells would be permitted."** *"Aquifer Storage and Recovery Feasibility Report Santa Rosa Long Term Wastewater Project"* Parsons Jan.95 p. 6-1

001(cont.)

This means more monies will be need to process the water.

**"The regulatory framework for ASR is uncertain."** *Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS*. HBA July 31, 1996 p. 3.1-36

The means process is so new that the regulatory framework for ASR is uncertain. The California Department of Health Services has not set guidelines for groundwater recharge or guidelines for issuing permits for ASR projects. When studying the Todd Road area the consultants found that:

**" This( ASR project) would require that at least 70 existing wells in the Llano Road area be taken out of service and provided an alternative water supply."** *Documentation in Support of the Elimination of Alternatives* Parsons April 1996 p. 22

This means that wells are not safe in the ASR areas! Are the wells near the Third Street ARS site to be taken out of service? What is the cost of the new water supply?

The North Coast Regional Water Quality Control Board must resolve questions about issuing permits. Who will be pumping groundwater from the aquifer? What amounts of water are to be used? How is the quality of the water monitored and controlled? Many questions that must be answered now before legal suits make the policies.

We are asking you to reconsider the CH2MHILL's ASR Project. **CANCEL THE PROJECT!** Give yourselves and the voters time to read and reach conclusions by using the data from the \$11 million dollar EIR/EIS Report. You were lead to believe that this was not a part of the ARS project for *Santa Rosa Subregional Long-Term Wastewater Project*. Now is the time to stop spending Santa Rosa's tax dollars on a special project desired by CH2MHILL.

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