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**CITY OF SANTA ROSA
CITY MANAGER'S OFFICE**

September 25, 1996

Santa Rosa Mayor and City Council
P.O. Box 1658
Santa Rosa, CA 95402

RE: The July 1996 EIR/EIS Long Term Waste Water Project

Dear Mayor and City Council:

We attended both hearings yesterday, September 24th, but did not speak in order to save time.

We have read Vols. I, II and X and have the following comments on the EIR/EIS:

I-34: "Biostimulation - nitrogen can stimulate plant production." No study was done to show the effect that nitrogen would have on the algae and hyacinth-like water plants mushrooming in the Russian River. [We have noticed a significant increase in both forms of that plant growth in the river. We fear that Alternate 5B would increase that plant growth to such an extent that county resources could not control it. We would have a condition similar to algae in Clear Lake, California and in Klamath Lake, Oregon.] 001 002

I-34: "Any change to the water quality (in the Esteros) is considered significant." This Alternative should be discarded on this basis alone. 003

I-34: "A 20% design discharge to either the Laguna or the Russian River will have both adverse and beneficial impacts ... however, adverse impacts will be more frequent." This is unacceptable. 004

I-35: "The only potentially significant impact is exposure to increased nitrate concentration ... to local water wells in the west and south county." To say that mitigation by finding another water supply begs the question. Alternatives that damage wells used by other cities are unethical and unacceptable. 005

I-59: "This Alternate (5B) causes the least change on the environment when compared to other alternatives." This is similar to saying that alcohol is less harmful than drugs and tobacco. The massive Army Corps of Engineers alternative proposals are so over-sized that they generate fear on all sides, including rate-payers, farmers and all stakeholders. 006

I-59: "The No-Action Alternative is similar to 5B," We agree, but not for the same reasons as the Corps. In both alternatives, if a spill were to occur again, Santa Rosa would have to find another solution to its waste water problems. Santa Rosa would be back to square one after years of inaction and millions of dollars spent to no avail. If both 007

of the preceeding alternatives are discarded, we are left with 2, 3 and 4, all VASTLY OVERBUILT and economically unfeasible. | 007 (cont.)

I-62: "Increased river discharge ... combined with mitigation would avoid significant impacts." Again, if a future spill were to occur, what would the state water agency do? | 008

The last spill of 875,000,000 gallons is almost twice the 20% discharge rate in Table I-15 on page I-62. Surely that would present a significant impact. Santa Rosa would be back to square one again. | 009

2-9: "Swimmers and waders are likely to have minimal exposure because the discharge season ... runs from October 1 through May 14 whereas the recreational facilities ... are generally operated during the summer months." There is only one sentence devoted to residents on or near the river who habitually swim or wade in the river. | As tourism was not considered in the EIR/EIS, likewise residents who use the river were not taken into account properly. | 010
011

3-15: "All exceedances (of coliform levels) were below the concentration detected in the Russian River upstream of the Laguna de Santa Rosa discharge." Again, the Corps is choosing the least acceptable of two unacceptable choices. We concur with Brenda Adelman's assessment of the coliforms and pathogens in the water and their danger to humans, and refer to her comments. | 012

3-16: "The risk of disease from ingestion of enteric bacteria in final effluent is low." We would prefer no-risk to low-risk. | 013

3-16: "Cryptosporidiosis" Again, please refer to Brenda Adelman's comments. | 014

3-16: "Considering the uncertainty in estimating minimum infectious doses for some pathogens, it is not possible to accurately assess the risk from direct ingestion of treated effluent, let alone the risk through pathways other than ingestion." As two people who swim in the river daily, April through October, we are not comfortable with the above assessment, yet Santa Rosa can foul the Russian River with its waste water and not be concerned about its effect upon us. We are absolutely astounded, considering the Corps has no means of measuring these ill effects. | 015

3-17: "The limited number of samples adds uncertainty to the absence of these organisms in the effluent ..." Please refer to Brenda Adelman's comments. Can Santa Rosa make decisions based on "uncertainty?" | 016

4.7-61: "Exposure to the chemicals and microorganisms in reclaimed water via recreational contact ... was evaluated qualitatively but not quantified." Again, residents who live on or near the water and who swim or wade in it in addition to the summer months are not considered. Also, the Corps admits that it has no quantitative studies on effects on recreational users. | 017

4.7-62: "Only historic concentrations of nitrate and nitrite in the Laguna Plant effluent exceed California and Federal drinking water standards." The Corps has mitigation for this, but again, what effect will that have on the algae and hyacinth growth in the Russian River? Indeed, if it worsens, as it is certainly doing, can Santa Rosa or Sonoma County afford to clear the algae in the river from the outfall of Jenner?

4.7-62: "...discharge would occur during the time of year...when the potential exposure (i.e. swimming and wading) will be least likely to occur." Please refer to our response to 4.7-61.

4.7-62: "Thus the discharge does not present any additional risk than already exists in the river, based on the presence of coliform bacteria." In other words, its all right to add coliforms to the water because it already has a high level. This argument does not appear logical to us and again we refer you to Brenda Adeiman's comments regarding coliforms.

THE MOST GLARING INADEQUACY IN THE EIR/EIS IS THAT THE STUDY OF MANY SMALLER DAMS FOR AGRICULTURAL REUSE IS NOT CONSIDERED. The Corps' idea of havine one larger dam is economically unfeasible and alarming to everyone.

The admonition by the Public Hearing Moderator that speakers not repeat points made earlier does not take into account the differing reasons for holding those opinions. Federal law mandates that all citizens have the right to express their opinions on the EIR/EIS. It may take more time, but that is the democratic process. It was obvious to everyone at the hearing that there was an overwhelming cry for phased small dam alternatives. The Corps will no doubt spend precious time defending its alternatives rather than respond to widely accepted common sense phased proposals.

Sincerely,



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