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CITY OF SANTA ROSA
CITY MANAGER'S OFFICE

October 1, 1996

***Comments on Draft EIR - Santa Rosa Wastewater
Submitted by Marta Williams***

The following issues - inherent in the Draft EIR West County Option - are of special concern to residents in the Graton area. 001

1. Noise

The project noise levels posed by the pumping stations that would be installed in the Graton area have been inadequately studied. We who lived with the noise of the Graton Beverage 24 hour bottling plant operation in our valley, know the acoustics of this valley and we know that sound is magnified due to the acoustics of our terrain. The noise study conducted for the DEIR only estimated sound at a point adjacent to the pumping stations. Even at that, the decibels projected are twice acceptable levels for the County. The pumping stations will operate at all hours of the day and night, permanently changing our quality of life for the worse and possibly damaging our hearing. Anecdotaly, these pumping stations have been compared to locomotive engines. Excessive industrial noise in the past in Graton was the subject of legal action and community discontent.

2. Effects of Irrigation

002

a. Human Health

The DEIR indicates that over a period of 4 years 4 samples of water were collected from the treatment plant and analyzed for giardia, legionella, cryptosporidium and salmonella. Sampling and analysis for E coli bacteria was apparently more frequent but erratic. This minimal level of sampling and analysis is surprising and cannot withstand statistical scrutiny. Too few samples were collected to adequately predict water quality. This is even more true for the sampling done at Delta Pond, in which only 1 sample was collected and analyzed for cryptosporidium, giardia and Ecoli bacteria. That being said, the results for E coli bacteria in the Delta Pond single sample were alarming and would warrant further sampling; the levels were greater than 100 times the allowable maximum and out of compliance with Title 23 water quality regulations. This is of particular significance to residents of Graton, in that the DEIR map showing proposed pipelines appears to show wastewater being transported directly from Delta Pond to Graton for irrigation.

003

The concern stems from the fact that, again according to your maps, Graton is entirely surrounded by parcels earmarked for irrigation of Santa Rosa's wastewater. Aside from an unpleasant prospect of being the wastewater leach field for Santa Rosa's toilets and industries, there are some very serious threats to our health from your proposed practices. You have included no studies, but there is the very real prospect, of significant exposure of Graton residents and food gardens to wastewater in aerosol form. This could be an almost continual exposure, based on your current irrigation practices.

004

Residents in Graton are served entirely by well-water for their drinking water supplies. The potential impacts on our drinking water aquifers from the extensive irrigation you propose is not addressed. There is no acceptable mitigation for contamination of our drinking water source. With the level of irrigation you propose, such contamination is a likely possibility. 005

b. *Subsidizing Landowners Who Use Wastewater for Irrigation* 006

The practice of subsidizing landowners who use wastewater for irrigation can only lead to over-irrigation with wastewater. This is probably why excessive salts are **not** appearing in current irrigation fields - because the salts are washed into surface and ground waters due to excessive irrigation.]

c. *Atascadero Creek* 007

Excessive application of irrigation wastewater will result in runoff to and contamination of the Atascadero Creek ecosystem, which currently supports several endangered species as well as a thriving community of riparian species. While it is true that the Graton sewer currently discharges to the creek, we do not have any significant industrial effluent and our system, of solar and algae treatment and long retention times, has proven effective in achieving high levels of treatment for biological and heavy metal contaminants. The rapid process of advanced treatment in use at Santa Rosa does not. We still have shrimp in our creek and would like to keep them alive. 008

d. *Competition for Irrigation Sites* 009

As has been highly publicized, Graton sewer district ratepayers are working to form their own district and operate their sewer. Both Graton and Forestville are looking to achieve zero discharge and discontinue discharge into the tributaries of the Russian River. To achieve this, both communities will need to contract with agricultural users to irrigate wastewater. Neither community is in the position to offer subsidies for these contracts and we do not wish to be placed in a competitive situation with Santa Rosa with regard to contracting for wastewater irrigation sites. It is far more preferable to irrigate locally, rather than piping wastewater great distances.

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