

**UNITED
WINEGROWERS
for Sonoma County**

Phone: 433-7319

P.O. Box 382, Santa Rosa, CA 95402

December 7, 1994

TO: City of Santa Rosa
FROM: Bob Anderson

RE: Additional Comments on Scoping Report

These comments are a follow-up to my oral remarks at the November 17, 1994 evening session to review the Preliminary Scoping Report.

1. No Ocean Outfall: United Winegrowers supports the Regional Systems's first objective to maximize the reuse and reclamation of this resource as we believe the ocean already has enough water. We see no good reason to expand this study to include an ocean outfall alternative.

If the Corps' concern derives from the loss of wetlands at reservoir sites, an alternative would be to design a series of stair-stepped wetlands into the upper sidewalls of the reservoirs. Though these would be subject to periods of inundation, the reservoir actually ends up being less than half full a good part of the time. Placement of the release point into the reservoir along the upper sidewalls could create a series of additional wetlands.

In the alternative, has the canyon located just before the gate to Hood Mountain State Park been evaluated? It is off to the side of Santa Rosa Creek and appears to have only limited wetland habitat. Its elevation is approximately half that of the Geysers. It also offers the advantage of using reclaimed water to augment the streamflow of Santa Rosa Creek with potential for wetland enhancement along its length.

2. Be clear on the Community Separator option: The original Separator Alternative provided for both storage and wetlands creation by combining the two by creatively rethinking the concept of storage. However, the draft credits the alternative with only 500 acres of new wetlands in the Santa Rosa Plain (Appendix A, page 10).

3. Develop buffers and building blocks: A major obstacle for the System to avoid being weather-dependent is this area's wide and wild variations in annual rainfall amounts. Again I would request that a water balance and annual operation curve be provided for the public's review as soon as possible.

Given the variations in flow in the Russian River, an alternative that should be included is the concept of having buffers for those special circumstances when the System would require another increment of storage to meet irrigation demand or discharge into the Russian River above the approved one percent level. Special agreements could be arranged with those willing to having their reclaimed water discontinued under certain conditions. An additional increment of storage could also be provided by growing redwoods on flat or terraced areas designed to accept flooding only during unique or odd-ball weather patterns.

4. Include a Graph for ADWF: It would be useful to include the trendline for past and future ADWF and show appropriate milestones for the building blocks that need to be in place as the Average Dry Weather Flows increase over time to 22.5 mgd.

RRWPC**Russian River Watershed Protection Committee**

092
Post Office Box 501
Guerneville, CA 95446
(707) 869-0410

Dec. 8, 1994

Marie Meredith
Community Development Dept.
City of Santa Rosa
100 Santa Rosa Ave.
Santa Rosa, Ca. 95404

Dear Marie:

Agg
Around Nov. 1st, RRWPC sent out a mailer which included a letter to Mr. Tom Yokoi of the Santa Rosa Board of Public Utilities. We encouraged our supporters to sign and mail the letter (copy enclosed) to Mr. Yokoi if they agreed with its message.

Around Dec. 5th, I began to hear from a few people had gotten their letter back with stamped *refused*. They naturally thought that they had mailed them to the wrong address. We believe that as many as 100 people sent letters to Mr. Yokoi but only a handful contacted me. I got several them back and enclose them here.

Marie, Mr. Yokoi himself had given me the address that appears on the letter when I had asked him where I might send a correspondence so as to make sure that he personally received it. That address is also listed in the phone book under his name. Further, I know that board members of the Water Quality Control Board have personal and or business addresses listed so that you can send mail to them directly rather than to board offices. I assumed that Santa Rosa officials would allow the same opportunity.

I always send thank you letters to people who contribute to our cause. Generally those are the same people who send those letters in. When I send the *thank yous*, I will also send a duplicate copy of the letter, tell people what happened and ask them to direct the second letter to Ed Brauner. Mr. Yokoi can rest assured that we will never target him again.

Sincerely,



Brenda Adelman

CC. Tom Yokoi, Ed Brauner

Formerly River Citizens Sewer Committee

11/9/94

093

MARCI CAMACHO

(Name: Please Print)

16605 Bittner Rd.

(Street Address)

accidental 95465

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

A I support RRWPC's view that *all* wastewater discharges should be limited to 1% in the winter only. While the city produces a high quality of wastewater, there are many unknowns about chemicals and other toxic constituents that are currently either unregulated or underregulated. Further, viruses and parasites are sometimes a problem with even highly treated wastewater. I understand that a 1% discharge could represent as much as 400 million gallons in a single day and more commonly allows as much as 100 million gallons daily during wet weather months. Can you tell me what impacts these large amounts have at percentages even higher than 1% (up to 20%) in combination with all other river wastewater discharges?

BUC CLUB I support high levels of conservation and urban and agricultural reuse. I am concerned that city staff and consultants are developing a very expensive river option so it can be said that a 1% option is unaffordable. We request that you carefully scrutinize all project cost estimates to assure that projected expenses for the various alternatives are not padded in order to ensure a specific desired outcome.

DVY On a related matter, I am concerned that Santa Rosa's consultants are relying too heavily on estimated and/or inadequate data fed into computerized models as a basis for making recommendations about the safety of these discharges. *Conclusions about wastewater quality should be based on actual monitoring data that can be scientifically validated.*

Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Marcia Camacho

(Signature)

SUSAN RICHTER

(Name: Please Print)

Pc Box 969

(Street Address)

SEbastien, CA 95473

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,



(Signature)

Mrs. PAULINE S. GILBERT
(Name: Please Print)

11345 Laurel Hill
(Street Address)

GILBERTVILLE Ca 95444
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Mrs. Pauline S. Gilbert
(Signature)

TRISH WILSON

(Name: Please Print)

P.O. Box 777

(Street Address)

GUERNEVILLE, CA 95446

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Trish Wilson

(Signature)

Thomas Sharkey

(Name: Please Print)

5158 Hall Rd.

(Street Address)

Santa Rosa, Ca 95401

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Thomas E. Sharkey

(Signature)

John Chippie
(Name: Please Print)

1425 Tilia St.
(Street Address)

SAN MATEO CA 94402
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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Sincerely,

John Chippie
(Signature)

GENE DYRHAUGH

(Name: Please Print)

865 CORBETT AVE - APT 3

(Street Address)

SAN FRANCISCO, CA 94131

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

ALSO OWN
 15532 BIRCH VISTA LN
 FORESTVILLE, CA

Dear Mr. Yokoi:

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Sincerely,

Gene Dyrhaugh
 (Signature)

HOW DARE ANYBODY
 DUMP (HUMAN OR OTHER)
 SHIT INTO ANY
 RIVER?
 SHIT SANTA ROSA
 GROWTH DOWN TO ZERO

(Name Please Print)	
Richard J. Swan	
257 W. H. St.	
Bericia, CA 94510-3128	
(Street Address)	
(Town)	(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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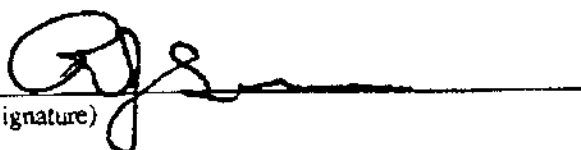
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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,


(Signature)

(Name: Please Print)

Mr. & Mrs. Charles Grech
779 Newman Drive
So. San Francisco, CA 94080

(Street Address)

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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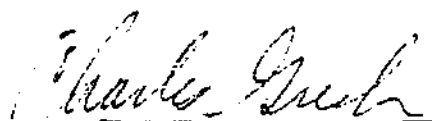
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Sincerely,



(Signature)

2241 Old Adobe Road
Petaluma, CA 94954
December 6, 1994

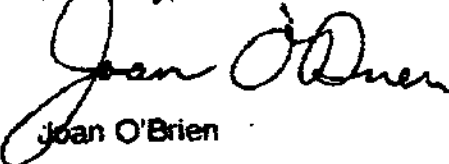
Mark Millan
Ponseti & Partners
3550 Round Barn Blvd. #202
Santa Rosa, CA 95403

Dear Mr. Millan,

Attached please find a copy of my remarks made at the Santa Rosa meeting November 17, 1994, regarding the Wastewater Disposal Program. I believe the reporter had difficulty hearing me or I spoke too quickly.

If you need any further information, please do not hesitate to contact me.

Sincerely,


Joan O'Brien

Post-It™ brand fax transmittal memo 7671		# of pages »
To Lee	From Maria	
Co. HBA	Co.	
Dept.	Phone # 543-3181	
Fax # 916 483-3364	Fax #	

Joan O'Brien
2241 Old Adobe Road
Petaluma, CA 94954
(707) 763-7574

As a property owner involved in a proposed reservoir site in the south county, I wish to address several points.

A
One of the plan's components, as presented, uses the Petaluma Hill Road/Old Adobe Road corridor and south county as a possible route and disposal site for treated wastewater. It would seem the City of Petaluma and its 47,000 people do not exist or ever have any need to dispose of local wastewater. No plan should be suggested for this area without a coordinated plan with Petaluma. While Petaluma is at a totally different planning stage, their current and future needs must be recognized. Your leapfrog approach to the south county presents major potential problems for you and Petaluma.

B
The reservoir site under consideration near me is within a mile of the Petaluma city limits on a watershed that drains directly into the city of Petaluma through park and residential development to the Petaluma River and San Francisco Bay. The site is sure to present geologic problems that will be very expensive to overcome. If the discharge and spill potential is felt by many to be unacceptable in the Russian River area, why should it be more acceptable in a larger and more dense urban area?

C
The reservoir is part of a very expensive plan to move water to the south county. I do not care to be involved in a reservoir site and there is very little support for any other reservoir sites in the area. I was present at a south county meeting when several potential users said they would not accept waste water if its use involved the condemnation of property for reservoir sites. At best the reservoirs will hold water for delivery to pasture land and vineyards that are relatively small acreages and at various locations which will increase the capital costs for the distribution system.

D
Whatever components you select for in depth study to solve current needs, two must be water conservation and growth limitation. Less water used obviously means less wastewater entering a disposal system. Under conservation there are many successful wetlands plans which could be developed in areas much closer to the source of the wastewater at the treatment plant. The program is a reactive, not a proactive procedure. While you are trying to cobble together a program to solve current needs, other forces are working for growth which exceeds these plans. There are limits to the capacity of the area to provide services for continued population growth, but they are not being confronted.

11/17/94



Subregional Long-Term Wastewater Project

SCOPING COMMENT FORM

Due December 7, 1994

Name: Kenneth C. BrownDate: December 7, 1994Address: 438 Eagle Rd. Sebastopol

CITY OF SANTA ROSA

P.O. Box 1678

Santa Rosa, CA 95402

City: _____ State: CA Zip 95472Phone: (707) 823 7233

DEC 09 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT**How to use:**

Please fill out the above information. Please provide your written comments about the Summary EIR/EIS Consultants Draft Scope of Work or the Preliminary Scoping Report on the form below. Please print or write legibly, or attach this form to your typed comments. You may add additional pages of your own if needed. When completed fold the form so the City's address is showing and tape the edge together, (Do not use staples), and drop in the mail.

A Comments: There can be no negative benefit of ocean outfall if there is
positive benefit of river discharge more than 10 miles upstream from the
Russian River estuary of heavily fertilized effluent. This heavily fertilized
wastewater harms aquatic systems, salmonids, river clarity turbidity, tourists,
retailers, swimmers, etc. There can be no measurable difference between
Llano Rd. Laguna dumping and ocean dumping if the total quantity and quality
of effluent is the same. The difference is the pristine beauty of the Russian
River. Please add ocean outfall to the alternatives studied in this present
Scoping Process for the SRWW EIR especially considering the Army Corps of
Engineers supported inclusion of Ocean Piping at the Scoping Meeting. -
P.S. Any continuous non-seasonal discharge should have priority over the
present seasonally limited inadequate system. Ocean piping is a
constant discharge alternative that along with enthusiastic Conservation
will satisfy growth and the rate-payers in future years beyond 2010.

C *D* *P.P.S.* Dual inlet piping for flushing and dual outflow piping
for graywater irrigation should be modeled for
cost/benefit and breakeven analysis for the
long-range survivability of the SRWWWS; this could
be done under the Algic of the present "no project"
alternative.

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

December 5, 1994

DEC 12 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT

ATTN: Marie Meredith
City of Santa Rosa
Department of Community Development
100 Santa Rosa Avenue, Rm. 3
Santa Rosa, CA 94501

Santa Rosa Subregional Long-Term Wastewater Project

I would like to make several comments on the proposed scope of the draft EIR for the above project. My comments are based on the Notice of Preparation issued October 21, 1994, and on the Summary of the Environmental Consultants' Proposed Scope of Work dated November 4, 1994.

A Wetlands Creation Design. On page 34 of the Consultants' Summary, they propose to make conceptual designs for wetlands creation and wetland enhancement on a site specific basis. I suggest that this level of detail is premature, especially in the Laguna de Santa Rosa. At the present time, public agencies (including the city of Santa Rosa) and private landowners are developing a Coordinated Resource Plan for the Laguna. This plan will set long-term management objectives, including habitat restoration and enhancement. The plan will be the basis for individual resource management plans subsequently developed by landowners such as the City, and the Department of Fish and Game. To design wetlands before long-term restoration goals are established seems a futile effort, and may endanger the goodwill currently developing between public and private landowners in the Laguna.

B Stream Augmentation. Augmenting summer low flows cannot automatically be assumed to enhance the natural resources of a stream or riparian zone. Before impacts can be assessed, many questions will need to be answered.

- What is the ecology of the natural low-flow regime? Intermittent pools separated by near-surface flow through alluvial material sustain diverse macro-invertebrate and microbial populations. How would continuous flows affect the aquatic food chain?

C

- Will the augmentation occur in a groundwater recharge or groundwater discharge reach of the creek? If in a recharge reach, what will be the impact on near-surface groundwater used for drinking (e.g., Americano Creek)? Will the increased recharge affect groundwater discharge downstream in terms of quantity or quality? If augmentation occurs in a discharge reach, what will the impacts be on water quality, especially temperature and nutrients?

D
E
F

- Will augmentation cause morphological changes in the low flow channel?
 - Will there be a loss of riparian vegetation due to elevated groundwater?
 - Will augmentation increase the stream's ability to transport pollutants?
- (A silage leachate spill in San Antonio Creek last summer was more easily remediated when streamflow became isolated in pools.) Will pollutants transported downstream become concentrated in sensitive habitats, especially estuaries and marshes?
- If augmentation is determined to be beneficial for in-stream resource values, will there be protection from withdrawal by riparian water users?
 - Who will responsible for monitoring long-term, cumulative impacts?

Sincerely,



M. Kim Cordell
P.O. Box 797
Sebastopol, CA 95473
874-0100

RRWPC**Russian River Watershed Protection Committee**

A-Hyd

RSSC COMMENTS ON THE DRAFT REPORT ON NON-POINT SOURCE
POLLUTANTS IN THE LAGUNA DE SANTA ROSA

RCSC is pleased that the North Coast Regional Water Quality Control Board has started to address issues related to non-point sources of pollution in the Laguna de Santa Rosa, and would like to offer our comments on the draft report.

A1 Our main concern is that discharges from Santa Rosa's Subregional Wastewater Treatment Plant, which is a point source, might have a far larger impact on the Laguna. In particular, it is unclear from the draft report what the relative importance of the point and non-point sources are. We would like this effort result in measurable improvements to water quality in the Laguna and the Russian river.

Our detailed comments are as follows:

- A2 1. The report relates to *concentrations* of pollutants, which provide only part of the impact. Overall *mass-loadings* provide a much better basis for evaluating the impact of the non-point sources on the Laguna and the Russian River. What is required is an estimate of the flowrate or volume of runoff at each monitoring point, so that the mass-loading of each pollutant can be calculated.
- A3 2. Although the report mentions that during collection of stream-bottom sediments, it was "... apparent from sight and smell that a substantial amount of these organic solids was cow manure", it is not clear whether: (a) this was true everywhere; and (b) if any attempt was made to verify that the solids were not anaerobically decomposing algae or other plant material.

We feel that this is an important issue to clarify since Figures 5, 7, 8, 9, 10, and 14 seem to indicate high nitrogen loadings from Santa Rosa's wastewater treatment plant (as implied by concentration measurements):

A4 Fig. 5 shows that total ammonia from the plant was very high during the years prior to nitrification, and that the dairy sources contribute only a relatively small load. This does not mean that the dairy sources have no impact, but rather that the cumulative impact of many years of high loadings from the plant must still be addressed.

A5 Fig. 7 and 8 show that the source of un-ionized ammonia is dairies, which is to be expected. The toxicity of the un-ionized ammonia is a concern, but its contribution to the overall nitrogen load in the Laguna is insignificant relative to other nitrogen forms.


A6 Fig. 9 and 10 show that the wastewater treatment plant might be contributing significantly more nitrate to the Laguna than any other source, especially after nitrification (as indicated by the large difference between the "no

discharge" and "pre-nitrification" or "post-nitrification" curves at monitoring-point LTR in Fig.10). There seems to be an error in Fig.9 for the "winter" curve: the nitrate contribution from the plant at monitoring-point LTR is missing. Since nitrate is immediately available for algae and plant growth, this nitrogen load might have the most impact on the Laguna, and since the load from the plant might be larger than that of the dairies, the cumulative impact of many years of high loadings from the plant must still be addressed.

A7
Fig. 14 shows that nitrification at the plant eliminated most of the organic nitrogen and the ammonia, but since total Kjeldahl nitrogen does not include nitrate (which is immediately available for algae and plant growth), this does not mean that the wastewater plant is not a major contributor of nitrogen to the Laguna. In fact, since the nitrate load from the plant was always relatively large, and has increased after nitrification, discharges from the plant must still be addressed before reaching conclusions about the relative importance of non-point source impacts on the Laguna.

- A8
3. Since effluent from the wastewater treatment plant is used for irrigation throughout the Laguna, discharges will still have an impact on the Laguna even under "no-discharge" conditions. It is not clear in the report how such loads were accounted for, although it is implied that everything that was not discharged directly from the plant was attributed to dairies, and to a lesser extent to urban runoff. Given the high nutrient concentration in the effluent, and frequently high surface runoff during irrigation, we feel that the impact of irrigation should be evaluated before reaching conclusions about other non-point sources.

Sincerely,



Brenda Adelman

June 8, 1994

**Comments on the Draft Report of the
*Laguna de Santa Rosa Water Quality Objective Attainment Plan***By John Rosenblum, Ph.D.
for the Russian River Watershed Protection Committee**GENERAL COMMENTS****Lack of Measured Data/Reliance on Computer Simulations**

A1 The primary concern with this report is the lack of measured data¹ and the over-reliance on computer simulations². At best, we feel that this report can be used only to identify where additional effort is needed to understand the complex relationships that lead to ammonia and dissolved oxygen problems in the Laguna. Without a better understanding of these relationships, the relative importance of each source is unclear, leading to miscalculations and inequitable allocations of Total Maximum Daily Load in the Attainment Plan.

Incomplete Evaluation of Nitrate in Wastewater

A2 The effect of nitrate in the wastewater discharged from the Laguna Subregional Treatment Plant in warm periods between October and May is not adequately evaluated. In addition, the effect of nitrates in irrigation drainage returns is not evaluated at all. Fig. 3-6 of the report shows that nitrate concentrations are 4 times higher than ammonia when the Subregional Plant discharges wastewater; Figures 3-3 to 3-5 show that concentrations of nitrate and ammonia in the Laguna are very similar. Since nitrate is immediately available to aquatic plants and organisms, its effect must be included in the evaluation. By ignoring nitrate, this report has essentially excluded the impact of the Subregional Plant on the Laguna.

¹ The RRWPC has presented its critique of the available data on numerous occasions; the main issues are: lack of systematic monitoring, lack of statistical validity, inadequate sampling.

² Doug Green of the RRWPC has presented very detailed critiques of the QUAL2 model on numerous occasions; the main issues are: (a) severe boundary condition discontinuities that preclude applicability to benthic-water column relationships; (b) insupportable uniformity assumptions for different reaches; and (c) incomplete relationships for nutrients and algae. The authors of this study also allude to these limitations (e.g. p.47 regarding stream flow gauging; p.50 regarding benthic processes).

Need to Address Other Impaired Objectives

A3 While this report focuses on ammonia and dissolved oxygen, the complete Attainment Plan should include other impaired Beneficial Uses. In particular, tests by the City of Santa Rosa have demonstrated chronic toxicity of both the background water in the Laguna and wastewater effluent to indicator species. Although the authors of this report maintain that loss of habitat, rather than water quality, seems to be the main impact on aquatic species (especially Steelhead) in the Laguna, the Attainment Plan is incomplete without addressing habitat restoration.

SPECIFIC COMMENTS

Dissolved Oxygen

B The discussion of yearly average dissolved oxygen concentrations in section 2.3.2 and Figs. 2-5 & 2-6 must be expanded to include seasonal and diurnal concentrations. The same applies to the dissolved oxygen results of the model (section 3.4 and Figs. 3-3 to 3-6). In particular, critical periods such as pre-dawn conditions in summer must be evaluated.

Impact of Wastewater

Impact of Discharges

C1 The regression analysis of Fig. 3-1 is inappropriate, not only because of the very low correlation factor ($R^2=0.35$), but also because discharges are independently and completely controlled by plant operators. A more appropriate evaluation would be to measure the impact at different discharge rates and stream flows (Fig. 3-6 shows a very large nitrogen contribution from the Subregional plant).

Impact of Effluent Irrigation

C2 Although it is stated on p.33 that monitoring data show that irrigation has no impact on groundwater quality, it is unclear whether this also means that irrigation has no impact on the Laguna:

1. Was the data collected near irrigation sites, during the irrigation season, and over several years?
2. How much wastewater irrigation occurred and how does the volume compare to rainfall and other sources of irrigation water?
3. Does subsurface drainage divert irrigation water before it reaches the groundwater? Were measurements taken in nearby surface water during the irrigation season?

Pollutant Load Calibrations

D The report uses estimations of pollutant loads from other reports (without discussing applicability to the Laguna), and then reduces these values by an unclear "calibration" factor to reach pollutant concentrations in the Laguna (p.31 for urban sources; p.36 for non-irrigated agriculture). Since Figs. 4-1 to 4-4 which use these calibrated results show that urban and non-irrigated agriculture sources are very significant, the immediate conclusion should be that local measurements must be obtained to validate the Attainment Plan.

Modeling Calibrations

E Section 3.4 describes many changes in input assumptions and equation parameters that were required to "fit" the output to results measured on only 2 "calibration" days and 1 "verification" day. What seems to have been lost in the details are:

1. How does the model "fit" for other days and conditions?
2. Are the changes valid³?
3. Are other processes (e.g. benthic and sediment reactions), not included in the model, more important in reality?

Lack of Nitrate Evaluation in the Modeling Results

F Section 4 of the report lacks a discussion of nitrate, which de-emphasizes of the impact of wastewater from the Subregional Treatment Plant (as direct discharges from October to May, and as irrigation returns in the irrigation season). Total nitrogen analysis by the Kjeldahl method does not include nitrate, thus the comparisons of nitrogen sources shown in Figs 4-1 to 4-4 are misleading. Additional graphs showing nitrate are required for a fair evaluation.

The addition of nitrate would probably show that the nitrogen load from wastewater is as large as that of the dairies. This would require a far more detailed evaluation of wastewater impacts, and a nitrogen control strategy that includes nitrate removal rather than only a reduction of ammonia concentration⁴.

³ On p.50, how does reallocation 50% of the incremental flow to the headwaters relate to measured volumes (if any exist) in the headwaters? On p.55, how does a sediment oxygen demand of 0.6 g/ft² relate to the original value (and to reported or measured values)?

⁴ The authors of this report acknowledge (p.77) that even though nutrients from the wastewater can contribute to aquatic plant growth, decay, and oxygen depletion, its impact was not evaluated.

Load Reduction Plan

Wastewater Quality Controls

61 Although some of the options include anaerobic processes, presumably for denitrification, the discussion centers around the removal of ammonia and organic nitrogen. Since the treated effluent is currently nitrified with 15 mg/l of nitrate (Table 3-8), the discussion should explicitly include an evaluation of nitrate reduction.

Dairy BMP's

62 Although the BMP's are covered in great detail, including costs, there is no mass-balance evaluation. This is a major concern since the source of the nitrogen is imported feed, which means that nitrogen must be somehow eliminated from the wastes in order to provide a steady-state balance. In practical terms, this requires:

1. An evaluation of waste treatment including de-nitrification.
2. An evaluation of the practicality of crop production based on the use of these dairy wastes (liquids and solids) as the primary fertilizer⁵.

Neither of these options will be affordable to local dairies under current economic conditions. The report (p.92) recommends 2 institutional/financial strategies that could help offset costs. The real test of practicality is whether the waste BMP's can be combined with reclamation of fertilizer value and changes in dairy practices, to create an affordable long-term solution.

SUMMARY

This report is a reasonable first step in evaluating where further work is required to devise an Attainment Plan. The draft reveals several issues that need to be addressed in more detail in the final report:

1. More measurements of flowrates and water quality are required, especially since the simulation model cannot reflect complex relationships occurring in the Laguna.
2. A detailed evaluation of the impact of nitrate in the wastewater from the Subregional Treatment Plant must be included.
3. Habitat impacts must be addressed.
4. An evaluation of control measures for all forms of nitrogen from the Subregional Plant wastewater, and from dairy wastes must be included.

⁵ To significantly offset feed importation, or for fruit and vegetables to be harvested and sold outside the Laguna system. Another option would be to recover nutrients for use outside the Laguna system.

December 13, 1994

A. Hyd - most of letter
B. Fiscal see pg 4**Comments on the North Coast RWQCB Draft Report
Waste Reduction Strategy for the Laguna de Santa Rosa**

This draft strategy relies on two previous reports that contain incomplete analyses and misleading conclusions that the Russian River Watershed Protection Committee has repeatedly commented on (see attached memos). The main issues are:

- A1
1. Incomplete analysis of nitrate impacts, especially on algae growth and its subsequent effect on Dissolved Oxygen. This is particularly important during warm, sunny spells in spring when algae blooms can occur, with subsequent night-time reductions in Dissolved Oxygen. Decay of such algae blooms could be contributing to accumulations of benthic nitrogen, which can be re-released to the water column in fall and/or in the following year. These interactions, which are very common, should be thoroughly investigated in the Laguna in order to develop a *direct* strategy for Dissolved Oxygen.
 2. Even without analysis of nitrate, effluent discharges from the Laguna Subregional Wastewater Treatment Plant appear to contribute more nitrogen than other sources on an annual basis¹. Nitrate is *not* included in the technical term "Total Nitrogen" that includes only ammonia and organic nitrogen². Inclusion of nitrate in the wastewater effluent³ dramatically increases the urgency of developing specific targets for wastewater reductions, rather than the vague generalizations included in this draft (which address only ammonia).
 3. As with previous studies, this draft lacks measured data (e.g. diurnal measurements of Dissolved Oxygen), ignores the questionable validity of existing data⁴, and relies heavily on an unverified computer model⁵.
- B

¹ Table 4-1 in the *Laguna de Santa Rosa Water Quality Objective Plan*.

² If the RWQCB and the City of Santa Rosa have calculated the term differently, we would appreciate an explanation.

³ Table 3-9 in the *Laguna de Santa Rosa Water Quality Objective Plan* shows that nitrate in the effluent has an average concentration 3 times higher than ammonia and organic nitrogen together.

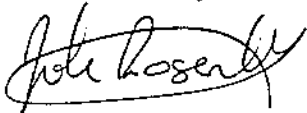
⁴ The RRWPC has presented its critique of the available data on numerous occasions; the main issues are: lack of systematic monitoring, lack of statistical validity, inadequate sampling.

- C1
4. The specific focus on ammonia loads from dairies is misleading, since it assumes that the load is the result of "over-topping" storage ponds and runoff from heavily manured areas. This is correct only for documented investigations of ammonia toxicity in creeks. Coupled with the exclusion of nitrate, this focus on ammonia "spills" creates the false impression that Best Management Practices (BMP's) will have an overwhelming impact. On the other hand, the more complex issue of evaluating and balancing all types of nitrogen inputs is missing in this draft (e.g. balancing manure and irrigation-water applications with crop uptake, sub-surface drainage, and salt accumulations in the soil).
- C2
5. Strategies for ammonia should be based on concentration as explained in the report, since fish are sensitive to very low concentrations. On the other hand strategies for Dissolved Oxygen should be based on *mass* limits, since suspended organic solids can settle and then create impacts in different seasons and years. Likewise, if nitrates can cause algal blooms and subsequent impacts in different seasons and years. Besides the practical issues of cause and effect, the Clean Water Act also specifies that the targets should be based on mass inputs rather than concentrations.

D

In summary, we feel that the draft strategy is incomplete and can be improved by: (a) developing direct measures for Dissolved Oxygen, (b) including specific measures for nitrate in the Laguna Subregional Wastewater Treatment Plant effluent, and (c) developing dairy waste BMP's to ensure balanced applications of manure and irrigation-water.

Yours sincerely,



John Rosenblum, Ph.D.

⁵ Doug Green of the RRWPC has presented very detailed critiques of the QUAL2 model on numerous occasions; the main issues are: (a) severe boundary condition discontinuities that preclude applicability to benthic-water column relationships; (b) insupportable uniformity assumptions for different reaches; and (c) incomplete relationships for nutrients and algae. The authors of Santa Rosa's study also allude to these limitations (e.g. p.47 regarding stream flow gauging; p.50 regarding benthic processes).

June 13, 1994

RRWPC Comments on:

Laguna de Santa Rosa Water Quality Objective Attainment Plan

by CH2MHill & Merritt Smith Consulting

RRWPC offers the following comments on the above named plan as supplement to John Rosenblum's enclosed remarks which we totally support.

The *Laguna de Santa Rosa Water Quality Objective Attainment Plan* (*The Plan*) was discussed at length at a meeting for the Laguna Technical Review Group on June 6, 1994. At this meeting Bob Klamt of the Regional Board mentioned that this plan would be integrated into the CRMP process. The CRMP process is supposed to come up with a management plan for the Laguna in only a seven meeting process (four meetings having already taken place) and is alleged to represent the consensus views of the group of farmers/property owners, local, federal and state agencies, and other concerned citizens on management of the Laguna area.

Yet I do not believe committee members know about this report. I still am not clear whether all of the CRMP members received copies of *The Plan*; since nothing was passed out at the meetings I attended. Even if some members did receive copies, there was nothing in the agenda or printed materials of the CRMP to call attention to the issues presented in this report. The minutes of the CRMP meeting where Bob Klamt spoke, though detailed, made no mention of a particular study being prepared. While he alluded to some issues in the report, nothing was said about the existence of the report itself. Further, I noticed nothing in the report about the CRMP process and representative committee working on a Laguna plan.

At an earlier meeting in May, there was considerable time spent in one CRMP meeting discussing boundaries of the Laguna. Requests for maps were made by committee members and a Dept. of Fish and Game map was later distributed. There was no reference made to the Laguna boundaries mapping and discussion in *The Plan*. I also have been told that Kim Cordell, coordinator of the CRMP process told John Rosenblum in a recent conversation that she knew nothing of this document. *We believe that full disclosure be made to the committee and that this document be fully discussed by that group if they are to be integrated in any way into the TMDL process.*

Formerly River Citizens Sewer Committee

For some time now Santa Rosa officials have been holding the failing septic tank issue up as a paper tiger response to river residents' complaints about the impacts of their wastewater on those who live downstream. The city has attempted to characterize some undocumented failing septic tanks as being far more damaging to Russian River water quality than their entire multi million gallons per day discharge. Our response has been to consistently point out that even with meeting a 2.2 mg/l coliform standard, the scale of Santa Rosa's contribution to the coliform count goes far beyond any amounts contributed by septic failure. In addition, city officials have never even identified any specific failures.

In determining how many septic tanks exist in the unincorporated areas of Sonoma County, the consultants relied on General Plan projections for the entire watershed (including what?) and USGS maps. We wonder why they did not look at septic permits registered at the Sonoma County Health Department which would have given a more realistic appraisal of the actual numbers in existence.

It would be appropriate to determine which of the 12,000 septic tanks actually impact the waterways, many being so far from streams that it is unlikely that they are having any influence. It is also possible that people on septic tanks use less water than urban dwellers; the assumption of 75 gallons per person per day is a fiction. As an example, Guerneville residents are generating far less wastewater than was anticipated in the project design. We wonder how the 75 gpd has been established. Are you in fact applying city standards to rural use?

This *Water Quality Containment Plan* originally attempts to give the impression that septic tank failure is a serious problem as well as an important contributor to Laguna water impairment. The *Executive Summary* on page ES-6 states, "Nutrients in ground water due to septic systems is a potentially large contributor to Laguna algal growth in summer." (This statement is repeated in Table ES-1 on p. ES-4 and Table 4-2 on p. 67.)

Then, in the same paragraph, although no problems had been identified, three alternatives for control of the imaginary problem are suggested. Before even moving on to the next paragraph, it is assessed that these suggested methods would not really work anyway because many of the septic tanks are located long distances from the receiving water.

While presenting absolutely no evidence of a problem, city consultants then recommend a *more detailed evaluation of the magnitude and importance of septic waste on the Laguna*. Yet on page 45, inside the body of the report, consultants state, "Compared with the total nitrogen load of 274,000 pounds

per year from normally operating septic systems, the nitrogen load from failing systems of 147 pounds per year was assumed to be relatively insignificant." This report also determined that loads of phosphorus (p. 46)"...from failing septic systems is also relatively insignificant, and pollutant loads from failing septic systems were not included in the watershed modeling." *Consultants here are recommending further study of a situation which, by their own admission, gives no indication of a problem.* Needless to say, such a study would be quite lucrative for the consulting firm.

We would also like to point out that the Figure ES-2 is very misleading. Make-believe nitrogen (325,000 pounds per year) and ammonia (80,000 pounds per year) loads for septic systems are shown to be near the top of each graph for Winter, Non-Storm periods. (Did the consultants assume that all 12,000 septic systems would have an equal impact when they calculated the amounts of total nitrogen and ammonia? How did they account for the varying amount of use (ie. family size) for each unit?) On page 44 of the plan it states that 274,000 pounds of total nitrogen were estimated to be produced in the watershed *each year*! Yet the graph misrepresents this number. There was no explanation for the ammonia number except to say that nitrification results in 25% ammonia. I figure this should be 75,000 pounds for the entire year and the graph shows 80,000 for winter, non-storm periods only. In fact, Figure ES-2 appears to be a wonderful example of computer modeling abuse.

RRWPC has other issues of concern. We wondered who decided, and with what rationale that dissolved oxygen (DO) and ammonia would be the constituents of concern? Why were nitrates not included? (See John Rosenblum's letter spelling this issue out in detail.) This *Plan* appears to focus more on the minimal contribution of septic systems to Laguna degradation than it does to its own contribution with massive wastewater discharges!

At the June 6th meeting, I specifically asked if the Regional Board's model had been used for this report. I was told by Dave Smith at that meeting that the Board's model was only for the Russian River and that they had their own. *I would like to formally request a copy of that model and would appreciate a direct response to this request as soon as possible.*

We have several concerns about *The Plan's* discussion of flow data. Why are most stream flows estimated and computer simulated? A discussion of available data would be appropriate here. Where have actual stream flows been monitored in the Laguna and over what periods of time? Who has been keeping the records? Table 2-2 on page 8 shows modeled and actual flows at Trenton-Healdsburg Rd. with actual flows being substantially less in most instances.

City consultants allude to discrepancies as *slightly less* for actual when in fact that is substantially understated. For instance, actual flows in November were 26; computer model flows were 180 for the same period. We consider this variation rather significant. Further, we have concerns that the numbers presented represent stream flow averages over a long period of time and the information they provide is of minimal value. It would be more useful to have the actual ranges presented on a weekly basis.

The discussion of stream flows appears to be very tentative and superficial. We wonder what specific roles does river level and dam releases play in Laguna stream flow, especially under differing natural stream flow (ie. weather) conditions? While there is mention of backflow into the Laguna from river high waters, there was no in depth discussion of the interrelationship. In fact, in 1986 flooding, it was stated that the Laguna flooded first from upstream sources. This situation was certainly exacerbated by operation of the upper Laguna and tributaries as flood control channels, where the water is purposely moved more quickly into the agricultural areas. Further, we wonder how flooding is compounded by Santa Rosa's wastewater discharges in the winter time?

B
Fiscal

A cont
Relatedly, we wonder what impact will be created by future growth in the Santa Rosa plain? I understand that the Southeast and Southwest area plans fail to address this issue. In other words, what stream flows can be anticipated in the Laguna as a result of paving over more of the upstream land area? What nutrients and toxins will be added? Further, what impacts can be anticipated from future General Plan buildout of Santa Rosa, Rohnert Park and Cotati? How does this interface with controlled stream flows of the Russian River (ie. Is there any coordination between wastewater discharges and dam releases?) and anticipated increases in wastewater discharges and irrigation amounts resulting from this growth during all seasons and all weather scenarios? For instance, I saw no mention of Santa Rosa's winter irrigation program in *The Plan*.

Furthermore, what stream flow changes can be anticipated in the Russian River resulting from growth in other areas? How will anticipated increased water diversions as evidenced by SCWA's current proposal and 84 other water rights applications affect future stream flow which in turn will affect the Laguna and Russian River. What is the entire range of dry and wet weather stream flow scenarios possible?

We are very concerned that the Russian River estuary is being excluded from analysis in this document. There has been evidence of estuary degradation (see pictures enclosed) in the lower river. It is essential that this issue be

thoroughly studied before any increased wastewater discharges are allowed to flow into the River from the Laguna.

While *The Plan* alludes to the fact that dissolved oxygen data does not show the full range of variability, nevertheless, consultants proceed with their discussion of its effects as though it does. Data for this constituent has been taken at different times and almost never at night. Because of this, it is inappropriate to use any of the sample results in drawing conclusions about the presence of this constituent (or lack of it) in the Laguna watershed. (see J. Rosenblum's letter)

This report totally ignores the fact that Laguna streams are operated as flood control channels by the Sonoma County Water Agency. They have channelized Laguna streams in the past and continue to denude riparian vegetation with Rodeo and Round-up. Their stated intent has been to speed up water flow in the urban areas. While this practice causes substantive impacts on water quality and flow, this document fails to even acknowledge the SCWA's role in this situation. Consequently naturally occurring clean water processes are not allowed to happen.

Much of the degradation in the Laguna results from past and current management decisions made by the Sonoma County Water Agency (SCWA), the City of Santa Rosa, the Dept. of Fish and Game and the farmers, ranchers, and property owners of the area. This document focuses on agricultural and septic problems without adequate attention paid to reversing some of the management decisions made by the agencies.

At the very least, the authors of this document prefer to get around the impairment issue by declaring the impairment as a *normal* state and thereby supposedly eliminating the problem. The specific suggestion is to increase the dissolved oxygen standard in the summer time with the justification that the anadromous fishery does not require protection at that time. There is virtually no analysis of what effect this would have on the habitat when the salmon and steelhead are passing through. We also wonder how the whole biological chain of life balance would be affected by such a move. For instance, how would an increased warm water habitat breed and encourage species and habitat that might be in fact a hazard to the cold water environment? In fact, conclusions drawn in this report about the status of the fishery are mostly conjecture since the consultants have not been able to fish during high flows, when the fish are most likely to pass.

RRWPC has not had time to complete review of this document in the depth we would prefer and we intend to further refine and complete our remarks in future arenas. We would like to end however, with a strong statement about

our opposition to the proposal to change the status of the Laguna from a cold water body to a warm one during summer time in order to allow for the degraded status in perpetuity. We believe that this is tantamount to eliminating need for the Clean Water Act. The mere proposal that regulators and dischargers can even contemplate ignoring the intent of the Clean Water Act by allowing degradation to become the norm is abhorrent!

Finally, without going into detail at this time (We will present detailed remarks at Santa Rosa's scoping session on the long range EIR.) we wish to allude to the lack of attention given to estrogenic effects. There is a whole range of chemicals (including chlorinated by-products) many of which are not even tested for in wastewater, that are believed to cause sexual deformities and reproductive dysfunction in humans and wildlife, and are also linked to various kinds of cancer, including that of the breast and prostate. It is believed that these chemicals, in minute trace amounts under the detectable level, bioaccumulate and cause reproductive harm in future generations.

As we bring out more information on this issue, we aim to make its consideration mandatory. We believe that this document is very myopic in its view and therefore has little value in the protection of this resource, not only for ourselves, but for future generations. Our grandchildren may never have the opportunity to taste salmon or trout and posterity will be left with only the garbage of our present civilization.

ALON HARAMATI

(Name: Please Print)

505 7th St

(Street Address)

Petaluma, CA 94952

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

A I support RRWPC's view that all wastewater discharges should be limited to 1% in the winter only. While the city produces a high quality of wastewater, there are many unknowns about chemicals and other toxic constituents that are currently either unregulated or underregulated. Further, viruses and parasites are sometimes a problem with even highly treated wastewater. I understand that a 1% discharge could represent as much as 400 million gallons in a single day and more commonly allows as much as 100 million gallons daily during wet weather months. Can you tell me what impacts these large amounts have at percentages even higher than 1% (up to 20%) in combination with all other river wastewater discharges?

B I support high levels of conservation and urban and agricultural reuse. I am concerned that city staff and consultants are developing a very expensive river option so it can be said that a 1% option is unaffordable. We request that you carefully scrutinize all project cost estimates to assure that projected expenses for the various alternatives are not padded in order to ensure a specific desired outcome.

D On a related matter, I am concerned that Santa Rosa's consultants are relying too heavily on estimated and/or inadequate data fed into computerized models as a basis for making recommendations about the safety of these discharges. Conclusions about wastewater quality should be based on actual monitoring data that can be scientifically validated.

Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Alon Haramati

(Signature)

CITY OF SANTA ROSA
 P.O. Box 112
 Santa Rosa, CA 95402
 415 633 1224

DEPARTMENT OF
 COMMUNITY DEVELOPMENT

(Name: Please Print)



Mr. Farrell Winter
P.O. Box 11
NBES Graton, CA 95444-0011

(Street Address)

(Town)

(Zip Code)

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Sincerely,

(Signature)

CITY OF SANTA ROSA
P.O. Box 1678
Santa Rosa, CA 95402
DEC 15 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT

GLORIA POTTER

(Name: Please Print)

14977 CANYON 6 RD.

(Street Address)

RIO VIDO 95471

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(Zip Code)

MAILING TO:
POB 100

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Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Gloria Potter
(Signature)

RECEIVED
CITY OF SANTA ROSA
JAN 18 1994
DEPARTMENT OF
COMMUNITY DEVELOPMENT

John DeMunn
613 Sparkes Road
Sebastopol, CA 95472

110

Wayward Gardens

613 Sparkes Road

Sebastopol, CA 95472

(707) 829-8225

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

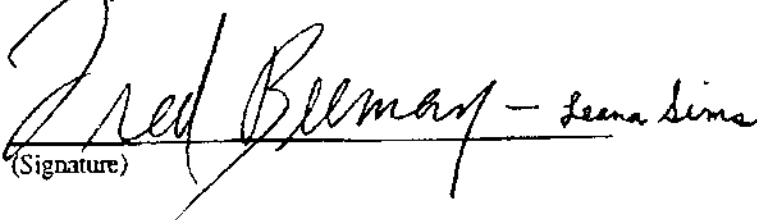
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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,


(Signature)

COMMUNITY DEVELOPMENT
P.O. Box 1671
Santa Rosa, CA 95402
408 10 1066

DEPARTMENT OF
COMMUNITY DEVELOPMENT

CHARLES P. BISHOP

(Name: Please Print)

10147 Field Lane

(Street Address)

Forestville, CA 95436 9729

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Charles Bishop
(Signature)

CITY OF SANTA ROSA

P.O. Box 1578
Santa Rosa, CA 95402

DEC 15 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT

RECEIVED

112



DEC 27 1994

HARLAND BATHOLIC
SANTA ROSA, CA

FILE:WC\44-1-1 SANTA ROSA LONG-RANGE WASTEWATER MGMT PLAN

December 21, 1994

CITY OF SANTA ROSA
P.O. Box 1670
Santa Rosa, CA 95402

Marie Meredith, Environmental Coordinator
Department of Community Development
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 94501

DEC 27 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT

SANTA ROSA SUBREGIONAL LONG-TERM WASTEWATER PROJECT

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and Preliminary Scoping Report for the above-referenced project. The Sonoma County Water Agency (Agency) will reserve specific comments on alternatives until the project alternatives are better defined. As you are probably aware, the Agency is currently preparing a Draft Environmental Impact Report (DEIR) for the Water Supply and Transmission System Project (WSTSP). There are several areas in which the Agency's studies and analyses for the WSTSP correspond or complement those being proposed for the subject DEIR. The Agency and the City of Santa Rosa's (City) consultants have initiated a cooperative effort regarding the preliminary details of these studies. The following comments address the need to continue this cooperative effort.

1. The objective of the Agency's WSTSP is to provide a safe, economical and reliable water supply that is adequate to meet the defined future needs in the Agency's service area. These future water needs are defined as the demands which correspond to the levels of growth projected by the current General Plans adopted by the general purpose governments in the Agency customers' service areas. This objective appears to be consistent with the level of growth anticipated in the first of the two overall project objectives listed on page 3 of the subject NOP. Erica Hendricks is the Project Manager and contact person for general questions regarding the WSTSP DEIR.

One of the Agency's consultants for the WSTSP DEIR, Montgomery Watson Americas, Inc. (Montgomery Watson), is currently preparing water demand projections for this level of growth in consultation with the Agency's customers in the Subregional Wastewater System (Santa Rosa, Rohnert Park, and Cotati). To the extent possible, the wastewater flow projections for the subject DEIR should either utilize or be consistent with the Montgomery Watson projections. Pamela Jeane is the contact person for questions regarding the Montgomery Watson study.

2. Montgomery Watson is also evaluating the current water conservation programs of the Agency's water contractors and analyzing several new water conservation measures and/or programs. These new measures have been grouped according to two levels of water conservation: those corresponding to the State Memorandum of Understanding on Best

Management Practices (BMPs) and those relating to a more aggressive water conservation program. It is expected that at least some of these measures will be incorporated into the Agency's final WSTSP. This work also appears to parallel studies proposed for the subject DEIR. The Agency would like to work with the City's consultants so that the analyses of water conservation measures for the subject DEIR is consistent with the analyses of water conservation measures in the Agency's WSTSP DEIR for Santa Rosa, Rohnert Park, and Cotati.

- A
3. Alternative 3 in the subject NOP includes storage of treated wastewater for later re-use. As part of the WSTSP, the Agency is studying an Aquifer Storage and Recovery (ASR) alternative. The ASR alternative would divert Russian River water to storage in groundwater aquifers during winter months for future withdrawal. The Agency would like to coordinate work with the City's consultant regarding the development and analysis of Alternative 3 (in the subject NOP) to avoid overlap in study areas and potential water quality impacts. Jim Flugum is the contact person for questions regarding the ASR alternative.
 4. The Agency has developed a computer model to simulate operation of the Russian River, Lake Mendocino, and Lake Sonoma to analyze the potential impacts on river flows from the increasing diversions of Russian River water. The Agency's analyses for the WSTSP alternatives will include projections of future flows in the Russian River. The Agency would like to make this information available to the City's consultant so that the subject DEIR can incorporate these flow projections in the analyses of Russian River discharge alternatives. Jim Flugum is the contact person for questions regarding the computer model.

The Agency has one additional comment:

- B
5. A 3836R permit will be required for any activity which would disrupt natural streamflow and an 1108 permit would be required for any activity which would block the natural flow of water in waterways. After January 1, 1995 both of these permits will be issued by the Sonoma County Permit and Resource Management Department. Ken Milam is the Director of this Department.

Thank you again for the opportunity to comment on the NOP and preliminary Scoping Report. All of the contact people named within this letter, with the exception of Ken Milam, can be reached at the Agency's administrative office, 526-5370. The phone number for the Permit and Resource Management Department is 527-1900.

Michelle A. Webber for

MICHELLE JULENE - ASSISTANT ENVIRONMENTAL SPECIALIST

RECEIVED

DEC 22 1994

RECEIVED
SANTA ROSA
MANAGEMENT

DEC 29 1994

HAB
SANTA ROSA
MANAGEMENT

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Mr. and Mrs. Richard A. Fione

(Name: Please Print)

20220 Breen Crt.

(Street Address)

Monte Rio, CA 95462

(Town)

(Zip Code)

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

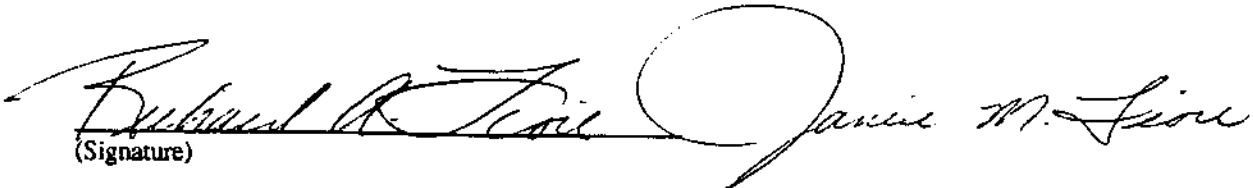
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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,


 (Signature)

cc: Mr. Ed. Brauner

RECEIVED**DEC 22 1994**CITY OF SANTA ROSA
MANAGEMENTGenevieve Malmstrom
(Name: Please Print)34905 Dutcher Creek Rd.
(Street Address)Cloverdale 95425
(Town) (Zip Code)Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

LS 217C

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Genevieve Malmstrom
(Signature)

RECEIVED**DEC 22 1994****CITY OF SANTA ROSA
MANAGEMENT**Elizabeth E Whitmore
(Name: Please Print)2257 San Antonio Ave
(Street Address)Alameda Ca 94501-4913
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Elizabeth E Whitmore
(Signature)

RECEIVED

DEC 28 1994

CITY OF SANTA ROSA
MANAGEMENTERIKA FLORIC

(Name: Please Print)

29 MISSION

(Street Address)

CAMP MEEVER, CA 95419

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman OR MR. ED BRAUNER
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Erika Floric

(Signature)

RECEIVED

117

DEC 28 1994

CITY OF SANTA ROSA
MANAGEMENT

Rosemary Benz
(Name: Please Print)

149 Escobar Ave.
(Street Address)

Las Gatos, CA 95032
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

(11057 Sunset Ave.
Forestville, CA
C Hacienda)

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Rosemary Benz
(Signature)

*My letter to Mr. Yokoi (a public official, was refused)!!!!
Please put me on the mailing list for the wastewater issue. Thank you -*

RECEIVED

DEC 29 1994

CITY OF SANTA ROSA
MANAGEMENTHONDEL, Phyllis H.
(Name: Please Print)1801 ILLINOIS ST.
(Street Address)VALLEJO CA 94590
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

Phyllis H. Honodel
 (Signature) Sonoma County property owner.

I hope Mr. Yokoi will be reprimanded
 for his rude action.

RECEIVED
JAN 04 1995
 CITY OF SANTA ROSA
 MANAGEMENT

SUZANNE CURTISS

(Name: Please Print)

10 SOTELO AVE

(Street Address)

SAN FRANCISCO CA 94116

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

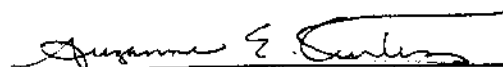
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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,


 (Signature)

RECEIVED

JAN 11 4 1995

SANTA ROSA
MANAGEMENT

William P. Murray

(Name: Please Print)

249 Seaview Avenue

(Street Address)

San Rafael 94901

(Town)

(Zip Code)

120

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

12/22/94

Dear Brenda A. Salmon -

William P. Murray

(Signature)

If this wastewater is so pure why
can't Santa Rosa dump it in the
SF Bay or the Pacific Ocean?

W. Murray

RECEIVED
JAN 04 1995
 CITY OF SANTA ROSA
 MANAGEMENT

Kenneth R. Hower
 Vivian Bens-Hower
 2540 Pleasant Hill Rd.
 Sebastopol, CA 95472
 (Street Address)

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

Nov. 5, 1994

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

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Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,


 (Signature)

ERICKSON RANCH
Valley Ford CA 94972

DEC 08 1994

Edward Brauner, Assistant City Manager
City of Santa Rosa
Santa Rosa CA 95401

November 23, 1994

Dear Mr. Brauner:

I am a coastal rancher near Valley Ford, who as you know have been very supportive of the West County irrigation alternative for disposal of water generated by the Santa Rosa Subregional Wastewater Treatment Facility. However, recent events related to the present round of EIR/EIS certification studies have raised serious concerns about this alternative with many West County ranchers. This letter is written to you by an individual, but represents an opinion held by other landowners with potential for participating in the West County alternative.

The West County irrigation alternative was sold by CH2M Hill and City staff on the specific basis that no operating ranches would be condemned for reservoir creation purposes. The new slate of consultants have no institutional memory and little sympathy with this gentleman's agreement. Current draft EIR/EIS documents indicate that all reservoir options are now on the table, and that condemnation would be used on an as-needed basis to acquire desirable or needed reservoir locations. Field crews associated with recent detailed reservoir soil/geologic studies on the Ielmorini ranch near Valley Ford have supported this notion. I assume that similar efforts have been undertaken for proposed reservoir sites on the Stump ranch as well.

It is my belief that most West County ranchers interested in the water have multi-generational community roots that are much more important to them than working with the City and its urban clientele to solve a water disposal problem. The City has been perceived by some to be an untrustworthy entity to deal with because of variable and capricious policies, as evidenced by past policy shifts and the change in direction noted above. Most of the 40 landowners representing 7,000 irrigable acres in the West County have publicly stated that they would not accept water if it results in condemnation of a local ranch or ranches. The previously-discussed University-owned Button Ranch alternatives, while not universally supported, are acceptable to most West County ranchers having an interest in using the water.

Please enter this variable into the record in an appropriate manner for study in the EIR/EIS process. To summarize, I believe that the actual West County irrigation acreage would drop to zero to 20 percent of the stated available acreage, should a local ranch be condemned for use as a reservoir site.

Very truly yours,



Lee Erickson, Erickson Ranch
Valley Ford CA 94972-0446
707/795-2498

cc: George McClelland, WATER group
Leo Ielmorini
Colleen Stump Briggs

DEC 09 1994

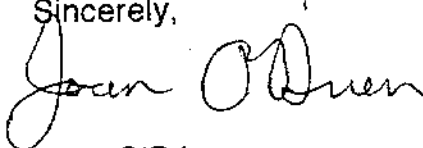
2241 Old Adobe Road
Petaluma, CA 94954
December 6, 1994

Edwin H. Brauner
Assistant City Manager
Office of the City Manager
P. O. Box 1678
Santa Rosa, CA 95402-1678

Dear Mr. Brauner,

Enclosed please find a copy of the remarks I made at the Santa Rosa meeting November, 17, 1994, regarding the Wastewater Disposal Program. Mr. Millan of Ponseti & Partners asked that I send a copy to them as the reporter was unable to hear me or I spoke too quickly. If for some reason the remarks did not get into the record, I am also sending a copy to your office.

Sincerely,

A handwritten signature in cursive script that reads "Joan O'Brien". The signature is fluid and stylized, with the first and last names being clearly legible.

Joan O'Brien

Joan O'Brien
2241 Old Adobe Road
Petaluma, CA 94954
(707) 763-7574

As a property owner involved in a proposed reservoir site in the south county, I wish to address several points.

A

One of the plan's components, as presented, uses the Petaluma Hill Road/Old Adobe Road corridor and south county as a possible route and disposal site for treated wastewater. It would seem the City of Petaluma and its 47,000 people do not exist or ever have any need to dispose of local wastewater. No plan should be suggested for this area without a coordinated plan with Petaluma. While Petaluma is at a totally different planning stage, their current and future needs must be recognized. Your leapfrog approach to the south county presents major potential problems for you and Petaluma.

B1

The reservoir site under consideration near me is within a mile of the Petaluma city limits on a watershed that drains directly into the city of Petaluma through park and residential development to the Petaluma River and San Francisco Bay. The site is sure to present geologic problems that will be very expensive to overcome. If the discharge and spill potential is felt by many to be unacceptable in the Russian River area, why should it be more acceptable in a larger and more dense urban area?

B2

The reservoir is part of a very expensive plan to move water to the south county. I do not care to be involved in a reservoir site and there is very little support for any other reservoir sites in the area. I was present at a south county meeting when several potential users said they would not accept waste water if its use involved the condemnation of property for reservoir sites. At best the reservoirs will hold water for delivery to pasture land and vineyards that are relatively small acreages and at various locations which will increase the capital costs for the distribution system.

C

Whatever components you select for in depth study to solve current needs, two must be water conservation and growth limitation. Less water used obviously means less wastewater entering a disposal system. Under conservation there are many successful wetlands plans which could be developed in areas much closer to the source of the wastewater at the treatment plant. The program is a reactive, not a proactive procedure. While you are trying to cobble together a program to solve current needs, other forces are working for growth which exceeds these plans. There are limits to the capacity of the area to provide services for continued population growth, but they are not being confronted.

11/17/94



Romberg Tiburon Centers

Center for Environmental Studies
San Francisco State University

3150 Paradise Drive • P.O. Box 855 • Tiburon, CA 94920-0855

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

DEC 27 1994

DEPARTMENT OF
COMMUNITY DEVELOPMENT

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

Dear Ms. Meredith

RE: Summary of Environmental Consultants' Proposed Scope of Work

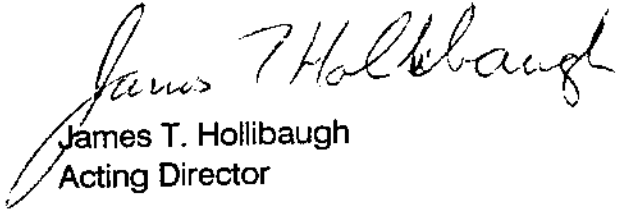
I have looked this document over and have the following comments, focusing primarily on the water quality aspects of the proposed studies.

- A 1) I found the descriptions of the proposed work generally to be so sketchy that it was difficult to really evaluate the suitability of the proposed studies. ANDY
- B 2) The sampling frequency appears to be generally lower than is desirable to obtain an adequate description of baseline conditions. It is especially important to sample the first runoff early in the winter and, if loadings are to be calculated, to sample more frequently during storm events than during low flow conditions. D. Smith
- C 3) The consultants should use the high sensitivity analytical techniques available for nutrients (nitrate/nitrite, ammonium, phosphorus) rather than the standard EPA protocols which do not have the sensitivity required for analysis of natural waters where concentrations are often <1uM. They should also determine total dissolved and particulate N and P in their samples. DAVE SMITH
G. DEART
- D 4) Potential water losses by evapotranspiration from the Sonoma Baylands marshes should be analyzed. I suspect that evapotranspiration will result in elevated salinities in these marshes during the summer, possibly to undesirable levels. This impact could be offset by reclaimed water. Evapotranspiration should be taken into account in any scenario that involves the creation of tidal marsh. D. Smith
- E 5) The numerical model used to analyze the effects of discharge into the Petaluma River on the river's salinity and nutrient distributions should also take into account the effects of the discharge on residual circulation, flushing and particle distributions. D. Smith
- F 6) Cost/benefit analysis of irrigating agricultural land or assessment of the environmental impacts of irrigation must take into account the impacts of other CHUCK NELSON

practices related to the shift of land use from primarily grazing to irrigated pasture or cropland. This includes, but is not limited to, pesticide application, increased herd sizes, increased mechanization, increased labor requirements, etc. It should also consider the implications of creating a new, long-term demand for water in a water-limited area.

Please keep me apprised of the progress of these investigations.

Sincerely

A handwritten signature in cursive script that reads "James T. Hollibaugh". The signature is written in black ink and is positioned above the printed name and title.

James T. Hollibaugh
Acting Director

AT THE TAP

TAP WATER TIGHTROPE

EPA inched another few steps down the tap water treatment tightrope this year in an effort to negotiate some kind of balance between two different health risks — those from disease-causing microbes and those from carcinogenic by-products of the disinfection process used to kill them. Three new draft drinking water rules have been added to the books since last year. The first, called the *Information Collection Rule*, requires larger water utilities to test source waters before, during and after treatment for both microbes and disinfection by-products. The second, the *Disinfectant By-Products Rule*, sets interim numerical standards for a variety of disinfection chemicals and their by-products. The third, the *Enhanced Surface Water Treatment Rule*, "makes sure no one backs off microbe treatment to comply with the new disinfection by-product standards," says EPA's Bruce MacIer. Data rolling in as a result of the first rule will help in the development, review and implementation of the other two, says MacIer.

EPA has also been tackling arsenic — a drinking water contaminant that occurs in so many places naturally that its regulation might require treatment of almost every groundwater source in the country. Intense discussion on the arsenic issue is now centering on whether the 50 ppb EPA currently allows should be reduced to somewhere in the range of 2-20 ppb. If the new standard falls at the 2 ppb end, it could present problems for water suppliers drawing on the Delta, where ambient arsenic levels have been measured at 5 ppb. Contact: Bruce MacIer (415)744-1884 ARO

BURREC PUSHES PLANNING

Twenty out of the more than one hundred water districts served by BurRec's Central Valley Water Project have water conservation plans that meet the agency's strict new evaluation criteria. BurRec published the new criteria in April last year, as required by the 1992 CVPIA — also known as the Miller-Bradley bill. By April

TECHNO FIXES

FROM TOILET TO TAP?

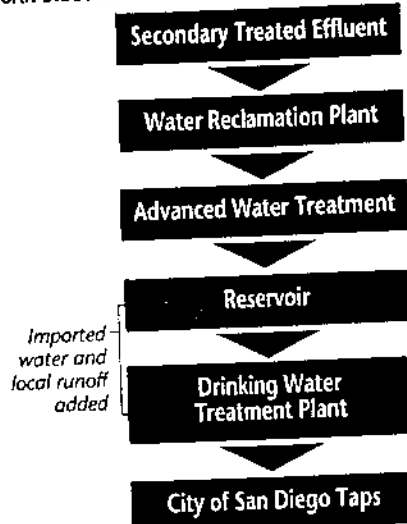
We'd all like to think our drinking water bubbles up from a pristine mountain spring before pouring out pure and clear from our faucets. Yet in reality, water is used, treated, then used again — a fact the San Diego County Water Authority hopes it can teach its customers so an innovative water reuse project can get underway. The Water Authority's Patricia Tennyson says the agency wants to treat reclaimed water to create a new potable water supply. The plan is to send effluent through a water reclamation plant for tertiary treatment, then to an advanced water

treatment facility for repurification using microfiltration, reverse osmosis, nitrate removal and other treatment processes. This water would be conveyed to a reservoir to mix with local runoff and imported water supplies. The blended water would then undergo conventional drinking water treatment before being piped to consumers.

Tennyson says the repurified water can meet or exceed the quality of the raw water supply now in the city's reservoirs. "We've gone to great lengths to ensure the safety of this potential water source," she says. "Our biggest hurdle is overcoming the public's perception that the water is unsafe."

Although San Diego relies on imported water for 90% of its supply, surveys showed that only 20% of its residents understood their water had been used before. "Once people realize how the water supply process works and understand this new technology, they agree that we can make the water clean," Tennyson says. One other hurdle may be treated water's cost — an estimated \$924 an acre-foot. But Tennyson says this amount is comparable to or cheaper than the cost of developing other water supplies such as a desalination plant. The state's Department of Health Services has given its conditional approval to the project, vastly increasing the potential uses for reclaimed water statewide. "Regardless of whether we end up doing this project, it shows us that any city in California could use repurified water for drinking," says Tennyson. Contact: Patricia Tennyson (619)692-9356 KA

SAN DIEGO'S WATER REPURIFICATION SCHEME



1994, BurRec had used the criteria to evaluate around 120 district water conservation plans, 95 of which had been updated to meet the new criteria, but only 22 of which met them. The other 73 are still being evaluated or revised.

BurRec's Debra Goodman says districts must show what conservation BMPs they plan to employ, and how and when they will be implemented. Without adequate plans, their CVP water contracts may not be renewed. To help districts improve their plans, BurRec is offering technical assistance through the state Department of Water Resources and will have two new water conservation specialists in the field by early next year.

Goodman couldn't say how much water has been saved yet as a result of the planning effort. But the new criteria do require districts to measure water inputs and outputs, something many will be doing for the first time, and then to provide BurRec with an annual progress report. Some figures may be forthcoming soon; some are already being plugged into a new conservation data base.

Goodman says the two next big steps are a 1996 update of the CVP users criteria and the early 1995 release of the BurRec's new "WestWide" conservation criteria for all 17 western states. Both will be available for public comment. Contact: Debra Goodman (916)978-5313 ARO

(Name: Please Print)



KEN G. WILSON
388 Ferguson Rd., Sebastopol, CA 95472

(Town)

(Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

Dear Mr. Yokoi:

I am a supporter of Russian River Watershed Protection Committee (RRWPC) and am concerned about wastewater discharges into the Russian River. I have heard that you are soon going to review the range of studies to be undertaken by the city for Santa Rosa's long range wastewater environmental impact report. I am taking this opportunity to express my concerns to you.

A I support RRWPC's view that *all* wastewater discharges should be limited to 1% in the winter only. While the city produces a high quality of wastewater, there are many unknowns about chemicals and other toxic constituents that are currently either unregulated or underregulated. Further, viruses and parasites are sometimes a problem with even highly treated wastewater. I understand that a 1% discharge could represent as much as 400 million gallons in a single day and more commonly allows as much as 100 million gallons daily during wet weather months. Can you tell me what impacts these large amounts have at percentages even higher than 1% (up to 20%) in combination with all other river wastewater discharges?

B C I support high levels of conservation and urban and agricultural reuse. I am concerned that city staff and consultants are developing a very expensive river option so it can be said that a 1% option is unaffordable. We request that you carefully scrutinize all project cost estimates to assure that projected expenses for the various alternatives are not padded in order to ensure a specific desired outcome.

D On a related matter, I am concerned that Santa Rosa's consultants are relying too heavily on estimated and/or inadequate data fed into computerized models as a basis for making recommendations about the safety of these discharges. *Conclusions about wastewater quality should be based on actual monitoring data that can be scientifically validated.*

Please put me on your mailing list and keep me informed about your long range plan.

Sincerely,

(Signature)

Art McNulty
(Name: Please Print)

493 Wilbur Dr.
(Street Address)

Pleasant Hill, Ca. 94523
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
Santa Rosa Board of Public Utilities
3501 Deer Park Dr.
Santa Rosa, Ca. 95404

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Sincerely,

Art McNulty
(Signature)

*Correspondence***RECEIVED**ED Cooper Jr

(Name: Please Print)

JAN 05 1995

CITY OF SANTA ROSA
MANAGEMENT1838 38th AVE

(Street Address)

San Francisco, CA

(Town)

(Zip Code)

F No 218

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 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

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Sincerely,

Edward J. Cooper Jr
 (Signature)

RECEIVED

MAR 13 1995

HARVEY M. YOKOI
SANTA ROSA, CAMARY L. DONATELLI
(Name: Please Print)226 20th AV.
(Street Address)SANTA CRUZ CA 95062
(Town) (Zip Code)

Mr. Tom Yokoi: Vice Chairman
 Santa Rosa Board of Public Utilities
 3501 Deer Park Dr.
 Santa Rosa, Ca. 95404

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(Signature)

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

MAR 06 1995

DEPARTMENT OF
 COMMUNITY DEVELOPMENT

