Appendix I

Stakeholder Comments and Responses for the November 2025 Draft Feasibility Study Report

This appendix includes copies of the stakeholder comments received based on review of the November 2025 version of the Draft Feasibility Study Report. Also included is a summary table indicating a response to the comment and/or change made to the report as a result of the comment. Bold text in the response column indicates where report changes have been made.

RESPONSES TO STAKEHOLDER COMMENTS ON NOVEMBER 2025 DRAFT REPORT

Client: Russian River County Sanitation District

Project: Water Quality and Recycled Water Supply Feasibility Study

ID	REVIEWER	REPORT SECTION/ PAGE	STAKEHOLDER COMMENT	RESPONSE TO COMMENT
Rich Holmer Comments (undated)				
1	RH	*not specified*	As such the recommendation of “preferred alternatives” is shallow and misleading because these other issues may become obstacles to decisions regarding selection of projects and consideration of project alternatives.	The initial stated goal of the study was to define "preferred alternatives" related to regionalization and there were three approaches that were identified as the most feasible in terms of cost and qualitative ranking (Alternative 1a, Alternative 1c and a modified Alternative 1a). The report indicates that all three of these feasible alternatives should be carried forward for further assessment. It is also noted that the use of the language "preferred alternative" was not intended to imply these are the preferred alternatives related to addressing unsewered communities in the entire West County Area. **These are only the most feasible options with respect to regionalization. The report has been updated to use more qualified language to demonstrate that these are the most feasible/lowest cost regionalization approaches and that identifying a preferred approach will need to include additional engineering analysis and well as an assessment of governance and financing feasibility.**
2	RH	*not specified*	The report also glossed over significant deficiencies in the RRCSD collection system which have led to repeated discharges of untreated and partially treated wastewater to the Russian River.	As noted on page 3-1 (footnote 2), the alternatives evaluation was limited to consolidation of treatment and recycled water facilities only. Collection system infrastructure improvements were specifically excluded from the scope of this technical feasibility study and would be an issue whether the RRCSD plant continued to exist or RRCSD connected to another regional facility. I&I reductions are known issues, and RRCSD is addressing I&I reduction and collection system planning through a separate, Master Planning effort. This separate effort also identified what facilities are needed at the RRCSD plant to address elevated flows. Information from this separate effort was used to inform the regionalization analysis. **The Report has been updated to note that costs and analysis related to improvements needed at the RRCSD to accommodate additional flows and loads are based on the separate Master Planning work and may need to be revisited based on information gained from the recent spill. The Report also has been updated to clarify that an investment in I&I improvements will need to occur before an acceptance of flows from outside of the service area.**
3	RH	*not specified*	Sonoma Water estimated the recent illegal discharge at 5,507,000 gallons of untreated wastewater. This raises the question of why RRCSD is considered to be a preferred alternative when these serious violations have occurred and can be expected to occur in the future?	*Response to Comment 2 addresses the evaluation of I&I.*
4	RH	*not specified*	There are several alternatives reviewed which would cause increased treated wastewater discharges to the Russian River during the allowed discharge periods...There are no limits set for phosphorous and nitrogen even though the river has experienced repeated incidents of toxic algae blooms...These lax discharge requirements should be considered when determining preferred alternatives.	Discharge requirements are established by the Regional Water Quality Control Board and are put in place to address water quality issues. All of the discharge alternatives include the facilities required to meet the standards established, which include requirements to remove nitrogen. If more stringent requirements for phosphorus removal were adopted in the future, the plants would also have to meet these limits without exception. No change to the report is proposed.
5	RH	*not specified*	Consideration [for effluent limits] should also be given to the Monte Rio water wells being less than a mile downstream of the RRCSD discharge point.	See response to Comment 4. This is a topic that must be addressed by the RWQCB and not the subject of this report.
6	RH	2.2.4	“The RRCSD Treatment Plant Master Plan included an assessment of the WWTP capacity-related improvements needed to process the anticipated 2035 flows and loads. However, that analysis also acknowledged the need to collect additional information to confirm the recommendations.” Therefore, this issue [of RRCSD capacity-related improvements] has not been thoroughly studied and could result in significant costs. Again why is RRCSD the preferred alternative?	The Master Plan is a separate study being completed by RRCSD to understand and define the capacity and condition related improvements needed at the RRCSD WWTP. It is not uncommon for routine monitoring data to not provide a complete picture of varying influent organic and solids loads to a WWTP. The Master Plan identifies that data collected during peak flows events shows very elevated loads entering the WWTP, which is not typical for inflow and infiltration events. Therefore, the Master Plan acknowledges that additional influent data collected during peak flow events will be helpful to confirm the findings of the Master Plan. This additional work and study will also inform continued evaluation of the potential West County regionalization strategies. Specifically, because **there is not space at the RRCSD WWTP site for a major facility expansion, the facility can only accommodate flows and loads from outside of the RRCSD service area to the extent these flows and loads don't require a footprint expansion. Chapters 2, 3, 8 and 9 of the Final Report have been updated to clarify this point.**
7	RH	3.3.1.1.2	Section 3.1.1.2 [apparently referring to 3.3.1.1.2] states that existing storage and disposal capacities are adequate at RRCSD. Really? Then why the 5.5 million gallon overflow?	The feasibility study relied on the best available information at the time from the concurrent Master Plan study, but additional study may be needed in light of the recent spill event. **Clarification has been added to the Report to indicate that additional study of facility improvements needed to process peak flows may be necessary in light of the recent spill event.**
8	RH	Chapter 4	Chapter 4 talks about “preferred alternatives”. These should not be called preferred alternatives when the issues of governance and financing have not been addressed. Perhaps use “most feasible based on limited engineering analysis”.	*See response to Comment 1.*

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Rich Holmer Comments (undated) [continued]				
9	RH	9.2	Again, this [reference to RRCSD WWTP having surplus capacity] is inaccurate given the deteriorated collection system which causes inundation of the treatment plant as demonstrated by the recent overflow and past overflows.	
10	RH	9.2	It only takes a modest investment to correct the deficiencies in this system? Why hasn't it already been done? How many sewage overflows does it take to get the improvements done?	
11	RH	9.2	The ability to use the 400 acres [near RRCSD WWTP for irrigation] is limited by a conservation easement and steep slopes. The above statement is misleading because it does not address how much, if any, of the 400 acres is usable for wastewater irrigation.	The referenced bullet acknowledges that "an additional *modest* expansion of the existing reuse system [on the 400 acres] could *potentially* occur." (emphasis added). The referenced bullet already qualifies the statement on using the 400 acres. In addition, Section 9.2 provides a brief summary of findings detailed elsewhere in the study report. The first discussion of the forested property in Section 2.2.5 acknowledges "potential challenges for installing new irrigation infrastructure." Similarly, Section 2.2.6 states "this site has restrictions for onsite uses and challenging topography that could preclude the ability to contract [sic, should be "construct"] new infrastructure within this area." **Clarification is provided stating that additional assessment of use of this area is a critical next step to confirming whether RRCSD could accept additional flows from unsewered communities.** It is also noted that the estimated 55 acre expansion area is based on agronomic application rates (no percolation). If percolation rates similar to historical levels on the upper Burch property were achieved, the acreage would be much less (closer to 17 acres). **This potential for there to be a much smaller expansion of the land application required has been noted throughout the report (wherever the 55-acre expansion is discussed).**
Brenda Adelman Comments (Letter dated January 19, 2026)				
12	BA	*not specified*	We don't think this analysis will rectify or even address the recent Guerneville illegal discharge of 50.5 MG on January 6 through 9, 2026, since few details are known at this time. Therefore, circumstances may have made this study obsolete before one hearing has been held and long before any final decision has been made as to a preferred project. This should be acknowledged and addressed	*Responses to Comments 2 and 7 address further evaluation of the RRCSD WWTP.*
13	BA	*not specified*	...the costs of 1a, though the lowest of all five, will certainly exceed the $55 to $84 million estimate mentioned and would end up much higher because the addition of septic system properties are not included in analysis along with the need for additional storage.	It is correct that this cost does not include the addition of unsewered communities. Evaluation of costs associated with adding in unsewered communities is presented in later chapters of the report. Chapters 5 and 8 specifically discuss costs and infrastructure needed to connect the unsewered communities evaluated, including Monte Rio and Villa Grande.
14	BA	*not specified*	I don't recall if Regional Study mentions need for more storage [for RRCSD], but it does enumerate the other major needs. Regionalization Study mentions some needs, and this one should certainly be on the list. The need for more storage should be a priority, if new flow levels are adopted.	*Responses to Comments 2 and 7 addresses further evaluation of the RRCSD WWTP.*
15	BA	Pages 2-4 and 2-40 (Table 2-17)	On page 2-4 claims 3213 ESD's (sic) and 2503 connections for RRCSD and 3621 ESD's (sic) on Table 2-17 (Page 2-40) Please explain discrepancy on ESD's (sic).	The discussion on page 2-4 is describing the existing RRCSD service area with mention of currently serving 3,213 ESDs. The next couple sentences explain that projected growth is estimated to add 408 new ESDs. Table 2-17 (titled "Projected West County ESDs") is presenting estimated projected ESDs and thus shows the combined total of 3,621 ESDs (3,213 + 408). No changes are needed to the report.
16	BA	Pages 2-4 and 2-40 (Table 2-17)	Your website should include a very clear definitions of what is covered by each [ESD] within individual Districts. For instance: how many ESDs for restaurants in District, how many ESDs for hotels, motels, guest houses, apartments, etc.	Each District has a different strategy for defining an ESD. This is not unusual. Providing this detail in the Report would not impact the findings or analysis and is therefore not necessary. **Sonoma Water will consider providing information related to assignment of ESDs on its website.**
17	BA	Pages 2-4 and 2-40 (Table 2-17)	Also how many properties entitled to ESDs that are not being used currently exist? This would also apply to as yet unbuilt motels, etc. In other words, we would like assessment of urbanization potential.	Each District provided information about the likely number of additional ESDs over the next 10 year period. This information was incorporated into the report. For instance, the fourth paragraph on Page 2-4 discusses a potential 408 new ESDs within the RRSCD service area. Section 2.3.1 and Table 2-6 discuss potential new ESDs for the Graton CSD, Section 2.4.1 and Table 2-11 provide similar for the Forestville Water District. No growth is assumed for the Occidental CSD.
18	BA	*not specified*	One of the goals of the project is to assess potential for the addition of unsewered areas in relative proximity to the treatment plant being studied. Yet the costs and challenges of hooking up specific septic areas are not considered in feasibility analysis. For instance, Monte Rio and Villa Grande potential loadings and costs are not considered in their likely hook up to RRCSD. ...the situation seems to invalidate fiscal estimates since a critical element is being left out. How much should be added to the estimates in order to address these concerns?	*See Response to Comment 13.*

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Brenda Adelman Comments (Letter dated January 19, 2026) [continued]				
19	BA	*not specified*	Capacity appears to be reserved for growth projections (another issue of concern). Then the reliability of the growth projections also come into question because of this limitation, or will the two issues [serving unsewered or growth within the RRCSD] be competing for capacity?	See response to Comment 17. The capacity assessments included both projected District expansion and unsewered communities.
20	BA	*not specified*	The number of ESD's (sic) does not correspond to the number of properties, and the breakdown is not explained. How many District ESDs are not hooked up to sewer in which they reside for which capacity if reserved?	*See responses to Comments 16 and 17.*
21	BA	*not specified*	Related to that, people keep asking how a 108 room proposed hotel for Guerneville can have capacity when a little ways downstream, the pipeline and Main Pump Station are often failing? What will hooking up this hotel do to the collection system if inadequate funding is available? By the way, this hotel will be open 24/7. Will their ESD's (sic) be determined at the same rate as a facility with much shorter hours?	The study relied on information from RRCSD regarding anticipated new connections and flows. Additional questions related to this topic are outside the scope of this effort.
22	BA	*not specified*	What type of benefit in terms of lowered costs (as promised)) can current ratepayers expect when new hookups are realized. In fairness to current ratepayers, and since they are being told their rates will go down if more people hook up, shouldn't there be some kind of estimate under various scenarios that inform them of how much savings can be expected?	An assessment of reduced costs as they relate to ongoing operations is provided in Chapter 8 (see Table 8-10, for instance). However, rates also include debt service payments that account for loans taken to pay for capital projects (see Footnote 12 on page 8-29). Financing and rate assessment is beyond the scope of this technical feasibility study. This study provides high-level regionalization costs for a fair comparison across alternatives. Detailed rate assessments would be needed for alternatives that move forward. **Additional clarification is provided in Chapter 8 related to when (and how) future rates may be determined.**
23	BA	*not specified*	...does this study address the problem of unanticipated change orders for any system selected? RRCSD had about 30 change orders and the supposed $13 million dollar system turned out to be $30 million. Thankfully, most of the funding was provided by the State and Federal governments. What would the governing entity do if that happens?	An assessment of financing and funding strategies are beyond the scope of this technical feasibility effort. Capital costs for this study were not prepared at a level of detail that would specifically account for change orders. Additional cost refinement would be needed for alternatives that move forward.
24	BA	*not specified*	Addressing environmental impacts and the costs of addressing them with EIRs and other environmental studies (especially on the fishery) appear to play no part in the analysis, and impacts of system failures affecting recreation and/or other uses, were not addressed. (we may have missed it.)	The project cost estimates do include environmental studies as a percentage of the construction costs. Alternatives that may have a higher level of effort for environmental studies (i.e. a new surface discharge outfall) have a higher factor applied for defining these environmental costs.
25	BA	*not specified*	Also, prior stakeholders paid large amounts to maintain and improve system. If another community reaps the benefits, what do they contribute to the facility that was partly paid for by original ratepayers?	Buying into existing systems is often managed through connection or capacity fees, similar to what has been discussed with Santa Rosa and Windsor. Each West County agency has current connection fees that new users within the existing service area would be subject to that are intended to cover the cost of their use of existing infrastructures. Connection fees that unsewered communities would pay are also estimated in Chapter 8 with relevant project costs. It is also recommended in Chapter 9 that each District review and better define what costs would be incurred by unsewered communities if they were to connect.
26	BA	*not specified*	Is [elevating all electrical components above the 100-year floodplain] included in Regionalization Study?	The feasibility study does not address collection system improvements. As noted in the response to Comment 2, the Report has been updated to clarify that an investment in I&I improvements will need to occur before acceptance of flows from outside of the service area.
27	BA	Chapter 2 (Page 2-4)	How is it that you are confident that [up to 5 million gallons of storage] will serve all flows especially during flood periods? Both ponds hold 4.5 million gallons. How is this adequate to allow for 5.0 capacity? How does the recent spill fit into this assumption?	*Responses to Comments 2 and 7 address further evaluation of the RRCSD WWTP.*
28	BA	Page 2-7	Assuming [equalizing peak day flows to 4.2 mgd] will address growth factor, what will address growth to system if area septic systems are also hooked up to system.	*Response to Comment 17 addresses questions about growth and who could be served.*
29	BA	*not specified*	For all these reasons [stated above the sentence], we would question the growth rate projections.	*Response to Comment 17 addresses questions about growth and who could be served.*
30	BA	Page 2-8	Yet somewhere we also saw that downplayed by a statement that claimed most of the spill was diluted with rainwater. Was this true? How can it be measured?	This comment is not specific to the report. Information related to the recent spill can be found in the Sonoma Water press release: https://www.sonomawater.org/rrcsd-spill.
31	BA	*not specified*	Yet, what does it tell us if elevated BOD/TSS is in the influent and the [January 2026] spill appears to be from the Treatment facility even when there is no flood? Can massive I&I occur when the river is below flood stage?	This comment is not specific to the report. Information related to the recent spill can be found in the Sonoma Water press release: https://www.sonomawater.org/rrcsd-spill.

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Brenda Adelman Comments (Letter dated January 19, 2026) [continued]				
32	BA	Page 2-11	And this storage [at RRCSD WWTP] remains constant and the flows don't go higher? Then there is the third unused aeration basin provides 0.4 of emergency storage. IS THIS REALLY ADEQUATE DURING HIGH FLOODS?	*Responses to Comments 2 and 7 address further evaluation of the RRCSD WWTP.*
33	BA	Page 2-13	There needs to be a lot more study of this situation [for the 400-acre RRCSD site] before relying on the "Burch" property for future irrigation expansion.	*Response to Comment 11 addresses further evaluation of the 400-acre site.*
34	BA	Page 2-13	Also there had been (and still are) concerns about allowing irrigation water to seep into the groundwater, especially at lower irrigation site, and somewhat at all irrigation areas. This limits the amount they can irrigate in any one area and with additional hookups, overirrigation could occur. This needs to be carefully analyzed and a range of options provided. It may be helpful to provide a map of the irrigation areas that shows elevations of the various hillsides on the property.	*The Study relied on best available information regarding disposal capacity. Additional assessment would need to be performed if needed under a separate effort.*
35	BA	Page 2-15	[Referring to use of EQ storage at RRCSD...] So unless more accurate predictions of global warming storms could occur, how reliable would this management policy be? This spill two weeks ago was a total surprise. Was the system being run at the peak of its capacity when the spill occurred? Is it wise to run a system at its peak during unpredictable weather periods?	*RRCSD will need to assess what factors led to the recent spill and develop a mitigation plan. Both operational and physical improvements may be required. This effort is beyond the scope of this study. Responses to Comments 2 and 7 address further evaluation of the RRCSD WWTP.*
36	BA	Page 2-15	This constraint [*apparently referring to available RRCSD WWTP hydraulic capacity and growth*] is mentioned on this page and claims some MINOR hydraulic conveyance improvements are needed, but do not mention details of what this would include or cost figures of doing it. We don't know what this would entail or for what populations it would serve. It goes on to mention other changes that would be needed, but our same concerns apply. Why are they not part of the project?	Details of the needed hydraulic improvements are listed on the top of Page 2-13 and Table 2-4. Costs for the hydraulic capacity improvements are first listed as $0.7 million on page 3-4 (Section 3.3.1.1.1). This information was based on studies being completed under the RRCSD WWTP Master Plan.
37	BA	*not specified*	This section [on the RRCSD opportunities and constraints] admits to limited storage and [also] states opportunities for possible expansion of current storage are limited. We believe that this should have been analyzed.	The study incorporated these findings by confining all alternatives to what could be accommodated by existing storage. As noted previously, the study relied on findings from the Master Plan to make this determination with respect to equalization of wet weather flows. This section of the Report has been updated per the comments and responses discussed above, including a statement that the analysis in the report is based on the assumption that the footprint of the RRCSD WWTP (treatment and storage) cannot be expanded.
38	BA	*not specified*	We support [joining Graton and Forestville operations] provisionally because we have had the experience of late, going through old newspapers, of reading about strenuous opposition from local citizens opposing various plans by local officials to make changes to these systems. On the surface, we think it would be reasonable to join these systems together, BUT ONLY if local citizen concerns are fully addressed.	Noted
39	BA	Table 2-9 (Page 2-23), footnote	We thought "peak daily flow" was the same as "peak influent flow". What is the difference between the types of flow?	Peak influent refers to a peak hour condition. Peak daily flow is a maximum daily average flow.
40	BA	Table 2-9 (Page 2-23), footnote	Also, how do you calculate rain water amounts on the ponds, if you do? If you don't, how do you calculate amount of discharge during a rainy period? (What consideration is there for rainwater intrusion? When rainwater joins wastewater, isn't it all considered waste? I there a dilution factor given. If so, what is it? If the rainwater has already been contaminated, and/or becomes contaminated by the spill water, what difference does it make how many contaminants are in it?	The water balances account for precipitation on the ponds. The equalization analysis was completed under the Master Planning effort and may need to be revisited as previously noted. The commenter is correct that once blended with wastewater, the stormwater is regulated with the wastewater.
41	BA	*not specified*	How is the number of gallons per ESD calculated as summer flows are still relatively low? (RRCSD averages 120 gpd) What are 'average' numbers based on?	The study report is referencing existing information published for each West County agency.
42	BA	Table 2-17 (Page 2-40)	Table 2-17...states that RRCSD has 3,621 ESD's (sic). But the number of properties is about 2600. Are there 1,000 ESD's (sic) that are part of multi-unit facilities or commercial establishments needing several ESD's such as restaurants?	An ESD is a unit that reflects the typical flows and loads provided by an individual home. So any connection that provides more flow and load than an individual home is assigned multiple ESDs.
43	BA	Page 4-12	What's the difference between effluent storage ponds and equalization basins?	Effluent storage is used to hold treated flows that cannot be immediately discharged. Effluent equalization is used to hold untreated flows that cannot immediately be processed for treatment.

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Brenda Adelman Comments (Letter dated January 19, 2026) [continued]				
44	BA	Page 6-11	To determine discharge: the Basin Plan does not allow flows over various years to be averaged in order to determine amount of discharge allowed. It's my understanding that any discharge is based on the flow that day.	The commenter is correct about actual discharge being limited to flow that day. For the study water balances, reasonably conservative assumptions were made about possible flow regimes in the Russian River. In addition, with storage the allowable discharge can be reviewed on a monthly basis, as flows held on one day can be discharged in the next. So overall storage needs are averaged out.
45	BA	Page 6-11	Discharges are not allowed at all between May 15th and October 1st which is the time of greatest amount of irrigation. The whole point of irrigation is to avoid discharge in the summer months. The irrigation capacity discussions are unclear.	**The discussion on page 6-11 (Section 6.6) has been revised to add additional clarity.** We have reiterated from Chapter 2 that no discharges are allowed between May 15 and September 30, and modified a reference to "discharge prohibitions" to "prohibitions on discharge flow rates above one percent of the receiving water flow rates." No change to the seasonal prohibition is assumed.
46	BA	Page 6-11	This [*assumed to be referring to previous bullet about managing irrigation systems to avoid all discharge*] is especially important in very dry years when irrigation is very limited. It is also a time when water allocations are strictly enforced and not as much wastewater is produced.	The purpose of the water balance analyses, including use of reasonably conservative assumptions around discharge flows, is to estimate recycled water storage and irrigation facility needs under (most reasonable) worst-case conditions (in a wet year when demands for recycled water are limited and discharge flows are the highest). The analysis is not intended to assess irrigation operations under all conditions. Nevertheless, because the concern from a recycled water producer/agency concern perspective is fulfilling contracts to water users, it is helpful to assess potential related to water availability in a dry year.
47	BA	Page 6-11	If what is being determined is the irrigation demand during various wet and dry years, and the extent to which it will use up stored water, I'm having trouble seeing the problem. During summers coming after dry years, the demand can be huge and less water may be available. But that is not a problem for treatment plants when you don't have the water to give away. During summers coming after wet years, there may be less demand, especially with grapes, but I'm not sure how you quantify the problem in so far as the wastewater ponds are concerned.	
48	BA	Chapter 9	It would be helpful to briefly name those amounts [investments for condition-related improvements compared to export costs] here.	**Additional cost information can be repeated from Chapter 8 in the related bullets for clarity.** Also, see response to Comment 10.
49	BA	Chapter 9	[Referencing resiliency under projected climate change conditions]...what about landslides and other geographical hazards, and groundwater intrusion (which was a problem for some discharges in the past) and seismicity of the parcel and river?	Potential impacts to hazards beyond those associated with climate change impacts were not evaluated as part of this high-level feasibility study. However, **the report has been modified to incorporate available information regarding hazards associated with each of the treatment plant sites. It is also noted that the RRCSD has higher hazard risks than the FWD site. This has been further highlighted in the report for clarity.**
50	BA	Chapter 9	...there has been no mention that approximately the last mile on Neeley Road before reaching the Treatment Plant, has houses that are still on septic systems and probably would not be able to hook up to the sewer system for reasons of which I am unaware. There may be an engineering justification for this that should be mentioned.	These homes are outside the current service area but were included as one of the clusters (Cluster 2) and would have the opportunity to connect in the future like any other cluster. A dedicated pump station and conveyance pipeline have been assumed for this cluster (similar to other clusters) for connecting to the RRCSD WWTP.
Dave Coleman Comment in Brelje & Race Email from January 2, 2026				
51	DC	Page 8-3	The first paragraph of page 3 of Chapter 8 of the Draft Feasibility Report states "Very little detail is provided regarding the development of the cost estimates that are included in the Monte Rio Study Report, and it is unclear whether the costs are representative of the construction cost or the total project costs[1]." With the footnote stating "The Monte Rio Study Report initially labels the costs a construction costs, which implies they do not include non-construction project elements such as engineering design and permitting. However, in other areas of the report, the costs are presented as project costs, which implies these elements are included." We are not aware of any contact [to Brelje & Race] from the report author to confirm the nature of the cost estimates included in the draft Monte Rio Study Report, and we believe Sonoma Water was aware that costs presented in the report were construction costs, rather than project costs. On December 19, 2025, a draft of the Monte Rio Feasibility and Preliminary Design Report was submitted to Sonoma Water for review. This draft report presented project costs as requested by the agency.	**The latest report prepared by Brelje&Race has recently been provided to the team, and the Feasibility Study has been updated to accommodate the costs reflected in the revised report. Reference in Chapter 1 has been updated. it is also noted that the collection system cost estimates included in the previous draft of the Monte Rio study were updated and increased. Therefore, because these costs were used to provide a basis for this study, the construction cost of the community collection system has also been updated in Chapter 8.**

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Dave Coleman Comments in Personal Email (as Forestville Resident) from January 2, 2026				
52	DC	*not specified*	My understanding is that one major objective of the report is the exploration of regionalization concepts to "improve water quality, water supply reliability, Pathogen TMDL compliance, and climate change resiliency in the Russian River watershed, **and address ratepayer costs for West County wastewater systems** [emphasis added by commenter]." Economy of scale is possible by combining small systems – and this is being pursued currently on the Occidental/Graton and the Graton/Forestville fronts. This will most likely result in lowering operating cost pressures on a per-user basis for each of these three small districts. This [economy of scale] is reflected in the estimates presented in Table 8-60, Summary of Annual Rates per ESD, of the report – which demonstrates that user rates could be less for the combined users of Occidental/Graton/Forestville compared to their respective existing rates, if these systems are combined (Alternative 1a). Further economy of scale is predicted if the flows of Guerneville are added – resulting in a 50% reduction in estimated rates (Alternative 1c). However, a larger economy of scale of the [Town of Windsor] and [Santa Rosa Laguna Treatment Plant] regionalization alternatives (Alternatives 2a and 2b) is NOT predicted for these alternatives. In fact, the user rates for each of the West County districts are estimated to be higher with these alternatives. Evidently, this is due to different O&M cost estimating methods employed for these alternatives – where treatment costs were cited by officials of those treatment plant agencies as compared to operating cost estimates for West County districts calculated more empirically by the study authors.	The analysis was based on the best information available. It is noted that the regional agencies have major upgrades/projects that must be completed at their facilities that are not incorporated into their current rates and both agencies indicated that rates could be even higher and suggested appropriate contingencies. The costs they suggested for use may not account for economies of scale that could be realized at their agencies (less likely an issue for Santa Rosa). Moreover, the rates addressed in this table include operation of the collection and large conveyance system, which must be borne only by the West County agencies. Therefore, it is not also reasonable to assume that connecting to these systems will have a lower overall operating cost.
53	DC	*not specified*	There are 5 preferred approaches that are identified out of the original 8. Due to the rating system employed, Alternatives 1b (all West County flows to the Guerneville plant) was eliminated whereas Alternative 1c (all West County flows to the Forestville plant site) was brought forward. However, it would seem that expanding the Guerneville plant to accommodate Occidental/Graton/Forestville would be more practical than expanding the much smaller Forestville plant to accommodate the larger flows from Guerneville. Also, Alternative 1c would involve a new treated effluent outfall to the Russian River from the Forestville plant; whereas Alternative 1b would not have required a new discharge point. Conveying the wastewater flows from Guerneville to Forestville and discharging the combined volume (more than double) of treated effluent just downstream of the Steelhead Beach Park would not be a popular proposal. It is not lost on the undersigned that currently treated effluent from the Forestville plant is ultimately discharged to the same point of the Russian River (via Jone Creek and Green Valley Creek), but the additional discharge and the physical construction of the discharge facilities would still be unpopular in the local area.	There are significant limitations of the RRCSD site to be expanded beyond its footprint, which limits its ability to serve as a central regional facility. Other environmental limitations and location limitations further point to RRCSD not being a good site for a large, regional facility. **These details (including more information about environmental hazards/seismic risk) have been added in the description of the constraints in Chapter 2.** In addition, it has been noted throughout the report that additional analysis of sizing and routing for the new outfall should be included in next steps.
54	DC	*not specified*	Hybrid Alternative 3b (Guerneville to Windsor and Occidental/Graton/Forestville combined at Forestville) is a preferred alternative. This does not make practical sense as the pipeline from Guerneville would pass through Forestville (less than 2 miles from the Forestville plant) on its way to Windsor. Why wouldn't that regionalization facility (the pipeline) be used to its fullest extent?	This alternative was identified by the Stakeholders as an approach they would like to see carried forward. So it was included.

ID	REVIEWER	REPORT SECTION/ PAGE	STAKEHOLDER COMMENT	RESPONSE TO COMMENT
Dave Coleman Comments in Personal Email (as Forestville Resident) from January 2, 2026 [continued]				
55	DC	*not specified*	It appears that subjective scoring criteria seems to be biased against continued use of the Guerneville plant and contradictory to conclusions reached in chapter 9. For example, Alternative 1b has the lowest Resiliency score due to "reliance on a treatment facility that is near the Russian River and thus particularly vulnerable to seismic and flooding impacts". However, it is not demonstrated that the Guerneville plant has a flooding issue or is more prone to seismic activity. Also, Alternative 1b has the lowest Long Term Regulatory Compliance score due to "the ongoing compliance issues at this site related to management of peak flows." However, the compliance issues related to peak flows at Guerneville are largely due to the condition of the collection system – which will remain in use under any alternative. Regional loads to the plant can be connected directly to the treatment plant or to an improved and robust end of the collection/conveyance system. It seems that bringing the peak flows from Guerneville to Forestville would bring more environmental risk due to the location of the facility in relation to a small tributary to Green Valley Creek.	See response to Comment 53. The FWD site is well outside of the floodplain of the Green Valley Creek and is not in a seismic risk zone. **This has been further clarified in Chapter 2 of the report.** Because the RRCSD plant can accommodate local flows and loads without expansion, the findings in Chapter 9 stand.
56	DC	*not specified*	In summary, everything else remaining equal, creating larger systems will allow a better economy of scale for both capital and operating costs. Arriving at an alternative that results in the continued use of small systems should not be undertaken lightly and regionalization alternatives should be considered as much as possible.	Noted

COMMENTS ON WEST COUNTY FESIBILITY STUDY DRAFT

Comment 1

This study was focused on looking at preferred alternatives for West County sewerage and the infrastructure needs associated with those alternatives. Unfortunately, it was strictly an engineering study that did not look at issues of governance and financing. As such the recommendation of "preferred alternatives" is shallow and misleading because these other issues may become obstacles to decisions regarding selection of projects and consideration of project alternatives. At the stakeholders meeting Jan. 12, it was repeatedly stated that this was strictly an engineering study and did not include review of how a selected project might actually proceed. The study area includes disadvantaged communities which may be severely impacted by decisions made regarding any future project. The study does not provide clear guidance for decision makers and the public due to its limited scope.

Comment 2

The report also glossed over significant deficiencies in the RRCSD collection system which have led to repeated discharges of untreated and partially treated wastewater to the Russian River. These discharges have occurred for decades without resolution. Without addressing the needed improvements to the collection system, the report ignores considerable infrastructure needs and associated costs. If the collection system is not repaired, the treatment plant can be expected to continue to overflow as occurred in the recent storms.

In the past, the illegal discharges were stated to be related to surcharging of the collection system when floodwaters entered buildings and drained to the collection system from submerged fixtures. In the recent storms, flooding did not occur and the RRCSD representatives are now saying that the overflow was due to excessive inflow and infiltration into the collection system from groundwater and surface runoff (note: if groundwater can enter into the system during high groundwater levels, then sewage can leak into the groundwater during lower groundwater levels). Sonoma Water has stated that the volume of the recent illegal discharge was 5,507,00 gallons. This is a substantial amount of discharge of untreated wastewater into the Russian River.

The RRCSD collection system is clearly deficient and causes the treatment plant to fail due to surcharging of the collection system resulting in excessive influent flows to the plant. **Unless this is corrected, the RRCSD cannot be considered to be a viable solution to sewering of unsewered communities or for use by other public treatment plants or Districts. Therefore, the "preferred alternatives" are not factual.**

The report should have addressed the causes of the excessive infiltration and inflow as well as what is needed to prevent inundation of the collection system during flood events. I feel that this is an ivory tower study without boots on the ground to pop open manholes and determine where excessive flows are originating and what is needed to correct them. It suggests a paper exercise to satisfy the requirements of the North Coast Regional Water Quality Control Board and, in its current state, will probably just be put on a shelf in an office with no follow through.

OTHER ISSUES:

Governance:

There needs to be an analysis of what type of governmental entity is needed to facilitate construction of the suggested alternatives as well as to operate the constructed facilities. At present the primary agency responsible for public sewers in the West County area is Sonoma Water. They have clearly indicated a desire to divest themselves of the current sewer systems that they operate. Is there any mandate or desire for Sonoma Water to take on a project of this broad of a scope? What agency will take a lead for preparation of engineering designs, grant applications, financing, construction oversight and operation of whatever is constructed?

Local districts most likely do not have the expertise or infrastructure to operate a sewer project of this magnitude. Is there a need for a comprehensive district to take in all of the study area?

Consultation from Sonoma Water, Sonoma LAFCO and special districts is urgently needed.

Financing:

Any project proposed as a result of this study simply will not proceed with out adequate grant financing. The study area has many low income residents living in single family housing, rentals and multi-family housing that will be significantly affected by costs associated with any project selected. It is meaningless to suggest “preferred alternatives” without consideration of how they will be paid for. Any project could disproportionately affect low income residents and minorities.

An analysis of ultimate out of pocket expenses to property owners and renters is needed. This should include in depth review of potential funding sources and how those funding sources will be accessed.

Other comments:

Section 2.2.1, RRCSD overview

Proposed infrastructure improvements do not address inflow and infiltration during rainstorms or inundation of structures during flood events.

Here is a quote from this section:

“Pending funding availability, preferably grant funding, RRCSD plans to replace three force mains and upgrade the lift stations to improve seismic and flood resiliency and address aging-related deficiencies. However, high peak influent flows to the WWTP are

expected to continue, as these collection system improvements are not specifically focused on reducing inflow and infiltration (I&I)."

If, as stated in the quote above, infiltration and inflow are not being addressed, then the treatment plant will continue to experience flows that it cannot accommodate. Sonoma Water estimated the recent illegal discharge at 5,507,000 gallons of untreated wastewater. This raises the question of why RRCSD is considered to be a preferred alternative when these serious violations have occured and can be expected to occur in the future?

Comment 3

This section further states "During periods of high rainfall and flooding, the lift stations often become inundated. RRCSD has reported 12 SSOs since January 2019".

Again, there is no plan for correcting problems from inflow and infiltration and inundation during a flood event. At the Jan. 12 stakeholders meeting, the Sonoma Water representative stated that backflow valves will prevent floodwater from entering the collection system during flood events. This is preposterous. Back water valves do exactly what their name implies. They prevent wastewater from flowing back into the building if the collection system becomes surcharged. They do not prevent floodwater from flowing into the collection system when the plumbing fixtures are submerged. If there is a magic valve that can differentiate between normal sewage flows from a dwelling vs flood water flows from fixtures, I would like to see that technology. The Guerneville collection system needs to be either equipped with valving that will completely shut off the sewer connection during a flood or the collection system should be reconstructed as a sealed, pressure sewer system.

Table 2.1 and section 2.2.2, Discharge limits

There are several alternatives reviewed which would cause increased treated wastewater discharges to the Russian River during the allowed discharge periods. The testing required for these discharges is rudimentary. There are no limits set for phosphorous and nitrogen even though the river has experienced repeated incidents of toxic algae blooms. Although the discharges are during the winter when algae growth is minimal, biostimulatory substances can become entrained in river sediments and released during periods of low flow. In addition, there are no standards for emerging contaminants such as pharmaceuticals, hormone disruptors and PFAS. Increasing the discharge to the Russian River is not appropriate.

These lax discharge requirements should be considered when determining preferred alternatives. Consideration should also be given to the Monte Rio water wells being less than a mile downstream of the RRCSD discharge point.

Comment 5

Section 2.2.4 states:
"The RRCSD Treatment Plant Master Plan included an assessment of the WWTP capacity-related improvements needed to process the anticipated 2035 flows and loads. However, that analysis also acknowledged the need to collect additional information to confirm the recommendations."

Therefore, this issue has not been thoroughly studied and could result in significant costs. Again why is RRCSD the preferred alternative?

Section 2.2.6 states:
"Portions of the collection system become inundated under river flood conditions resulting from significant storm events, which would require extensive collection system upgrades to address. Costs of these improvements have not been defined".

Again, significant costs which have not been evaluated.

Section 3.3.1.1.1 says that $30 million dollars is needed for headwork and force main improvements to RRCSD and $.7 million dollars is needed for hydraulic capacity improvements to the treatment plant. None of these costs address the issues of infiltration and inflow or inundation of the system. What are the actual costs to make this a functioning system? No estimate is given.

Comment 7

Section 3.1.1.2 states that existing storage and disposal capacities are adequate at RRCSD. Really? Then why the 5.5 million gallon overflow?

Chapter 3
There are numerous references in this chapter for needed infrastructure improvements and costs associated with the various alternatives. None of these sections includes costs for addressing the deteriorated collection system in RRCSD. Again, these cost estimates are erroneous without evaluating the necessary improvements to RRCSD.

Chapter 4 talks about "preferred alternatives". These should not be called preferred alternatives when the issues of governance and financing have not been addressed. Perhaps use "most feasible based on limited engineering analysis".

Tables 4.3 and 4.10 are completely inadequate due to the concerns that I have raised above about costs not being properly documented.

Section 9.2, Findings for RRCSD states:

"The RRCSD WWTP has surplus capacity to accommodate flows from local unsewered community clusters. These findings are supported by the Master Planning effort being concurrently completed."

Again, this is inaccurate given the deteriorated collection system which causes inundation of the treatment plant as demonstrated by the recent overflow and past overflows.

"Some condition-related improvements have been identified for the facility, requiring a relatively modest investment in the next 20 years compared to the cost of wastewater export."

Comment 10

Wow. It only takes a modest investment to correct the deficiencies in this system? Why hasn't it already been done? How many sewage overflows does it take to get the improvements done?

"RRCSD has existing land application area that could be expanded. RRCSD has also recently acquired nearly 400 acres of nearby forested area on which an additional modest expansion of the existing reuse system could potentially occur."

The ability to use the 400 acres is limited by a conservation easement and steep slopes. The above statement is misleading because it does not address how much, if any, of the 400 acres is usable for wastewater irrigation.

RRWPC

Russian River Watershed Protection Committee

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January 19, 2026

Emailed to:
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Samuel P. Magill: Facilitator
Parastou Hooshialsadat: SCWA
Kathryn Gies: West Yost
Ann Dubay: SCWA

RRWPC Comments on:
Draft Report: Water Quality and Recycled Water Supply Feasibility Study
West Yost: water engineers

Comments By Brenda Adelman for RRWPC

Introduction:

As a long time resident concerned about water quality, having lived in Rio Nido for the last 47 years, and customer of RRCSD for the last 30, I have tracked much of the history of the Russian River County Sanitation District (RRCSD) from 1980 to the present. On behalf of Russian River Watershed Protection Committee (RRWPC), I have written extensively about District projects and their impacts, including those from wastewater spills. I have advocated for collection system repairs before allowing new hookups. I have written about the health (or lack of it) of the Russian River and problems needing to be addressed such as endocrine disruption chemicals, toxic algae, and other issues, and have tracked local and State governmental actions to address, but sometimes make worse, identified problems. I have also requested that penalty funds for major District spills such as those in 2019, be put toward fixing our broken system, but instead the funds are being used

to fund this document calling for a possible great expansion of the District. I read somewhere that future penalties may also be applied to 'studies', rather than repairs.

I am in possession of a large newspaper record (10 boxes) of citizen involvement in these issues during that time, especially as they affect the West County and the lower river. I selected one article about Graton to provide a sense of how West County people feel about large agencies and their large agendas which are, on the surface, intended to address our wastewater 'problems', but often create new ones that make the problem worse while keeping lawyers and consultants well employed. West County residents feel strongly about preserving their rural life. Where there are battles between urban and rural values, it often ends in concessions by both, but so far has managed to retain basic rural simplicity, limited size facilities, hopefully limited environmental impacts, and cost effective construction, especially where money & space are concerned. With all the spills that have occurred with this system however, it is not known if environmental values have been upheld.

The article quoted below is from **Sonoma West Times and News** on August 2, 1995, page A4, and gives a sense of the community's determination to be heard.

"Residents of Forestville and Graton, unhappy with the county's plans to build a regional sewage plant for both communities, will hold a town meeting next week to discuss plans for water conservation as a means of forestalling the need for the plant and a temporary pipeline."

"Activists who are opposing the county's plans are also seeking a court injunction to stop the county from building a temporary pipeline between Forestville and Graton to transfer treated and untreated sewage."

"The opponents recently filed a lawsuit challenging the new regional plant idea, claiming that the new project was not described in the environmental impact report approved in 1993."

Supervisors later voted for the regional plant without gathering further public input. This action was met with more public outrage. It didn't get built back then but it's here again now.

This situation is a small sample of what has become a big problem for West County and was followed by years of protests over plans of Occidental's sewer issues, Forestville growth issues, Monte Rio sewer issues, Camp Meeker sewer issues, Jenner water issues, and Guerneville's sewer issues. Spills and high costs and health issues are usually the items receiving the greatest ire from the public. (Our news article collection cover most of this history.) What it boils down to is that people in West County love our natural environment, and the more simple, peaceful, and self-sufficient lifestyle. Citizens here will work hard to protect these values. We don't see that this Regionalization Study appreciates those values with it huge infrastructure proposals and over-the-top cost estimates that don't even cover all the infrastructure needs to be ultimately included.

Document analysis:

The Water Quality and Recycled Water Supply Feasibility Study (Regionalization Study) includes five alternatives that have been selected for further study out of eight originally put forward.

- 3 Local Scenarios: Alternatives 1a, 1b, and 1c. 1b has been eliminated, leaving 1a which includes local facilities at both Forestville (including Graton and Occidental) and Guerneville (remaining solo). The document acknowledges improvements would need to be made to both. We don't think this analysis will rectify or even address the recent Guerneville illegal discharge of 50.5 MG on January 6 through 9, 2026, since few details are known at this time. Therefore, circumstances may have made this study obsolete before one hearing has been held and long before any final decision has been made as to a preferred project. This should be acknowledged and addressed. (see PD article of 1-18-26 attached)

Comment 12

We had originally believed that 1a was the only option we could have supported. After the January 6th weather event however, we take our preliminary support back. It could change again later. (In addition, the costs of 1a, though the lowest of all five, will certainly exceed the $55 to $84 million estimate mentioned and would end up much higher because the addition of septic system properties are not included in analysis along with the need for additional storage. 1a is also the top choice of the consultant. It is also questionable whether it is possible to site a new storage pond at the Treatment Plant area. (If 1c were chosen where Guerneville's waste goes to Forestville, the total cost could go as high as $185 million, definitely out of the ballpark.) If new improvements are identified for 1a, it might go much higher yet.

- Note: Press Democrat Article on January 18, 2026 states: "*But many of the big projects–including upgrades to the system needed after the 2014 mainline rupture—have yet to occur and are reliant on spotty federal or state grant funding. Other needed improvements include an additional holding pond at the sewer plant with an estimated cost in the tens of million dollars, Royall said*." I don't recall if Regional Study mentions need for more storage, but it does enumerate the other major needs. Regionalization Study mentions some needs, and this one should certainly be on the list. The need for more storage should be a priority, if new flow levels are adopted.

- 1c sends Guerneville waste to Forestville. That is totally disruptive to the people of our District and a waste of money. We have so much invested over the last 40+ years, people would be outraged. As we have stated before the cost figures for all alternatives are through the roof. There is no way I can see people going along with this $185 million figure, even if it were 100% grant funded, and we all suspect that would not be approved in today's economy.

- We view other options as outrageous proposals that are not in keeping with the values of most West County citizens. For instance, lengthy pipelines to Santa Rosa and/or Windsor would expose communities to more wear and tear that can include ruptured pipelines and spills into sensitive habitats and waterways and at much greater expense.

Regionalization Study Issues:

- Ratepayer cost savings supposedly will result from regionalization but may also lead to urbanization. Things like major hotel facilities open 24/7 with many rooms will encourage a great deal of night activity which may lead to many other

supporting facilities that are undesirable in a rural area. This can lead to more money for the business people but also more light (bad for wildlife), more noise and possibly more crime.

- For this reason and others, RRWPC does not support the other alternatives but for possibly 1a, and perhaps not that either after big 50.5 MG sewage spill this month when river at 29'& not flooding. It was revealed in a Sunday Press Democrat article (Front page on 1-18-26) that the system does need new storage which might cost "…*tens of millions of dollars*." (David Royall)
- All alternatives are far too expensive to construct; communities will likely rebel.
- On page 2-4 claims 3213 ESD's and 2503 connections for RRCSD and 3621 ESD's on Table 2-17 (Page 2-40) Please explain discrepancy on ESD's. We have found this topic constantly changing and very confusing. Your website should include a very clear definitions of what is is covered by each within individual Districts. For instance: how many ESDs for restaurants in District, how many ESDs for hotels, motels, guest houses, apartments, etc. Also how many properties entitled to ESDs that are not being used currently exist? This would also apply to as yet unbuilt motels, etc. In other words, we would like assessment of urbanization potential.

(1) One of the goals of the project is to assess potential for the addition of unsewered areas in relative proximity to the treatment plant being studied. Yet the costs and challenges of hooking up specific septic areas are not considered in feasibility analysis. For instance, Monte Rio and Villa Grande potential loadings and costs are not considered in their likely hook up to RRCSD. Capacity appears to be reserved for growth projections (another issue of concern). Then the reliability of the growth projections also come into question because of this limitation, or will the two issues be competing for capacity? In either case, the situation seems to invalidate fiscal estimates since a critical element is being left out. How much should be added to the estimates in order to address these concerns?

(2) Costs projected in this document include costs of running TP and collection system based on current and future hookups, but not on possible septic system owners who may need a future hookup and for which the system has not currently been addressed. It also doesn't address (that we can see) the District ESD's that are not currently connected to the sewers. The number of ESD's does not correspond to the number of properties, and the breakdown is not explained. How many District ESDs are not hooked up to sewer in which they reside for which capacity if reserved?

(3) Related to that, people keep asking how a 108 room proposed hotel for Guerneville can have capacity when a little ways downstream, the pipeline and Main Pump Station are often failing? What will hooking up this hotel do to the collection system if inadequate funding is available? By the way, this hotel will be open 24/7. Will their ESD's be determined at the same rate as a facility with much shorter hours?

(4) What type of benefit in terms of lowered costs (as promised)) can current ratepayers expect when new hookups are realized. In fairness to current ratepayers, and since they are being told their rates will go down if more people hook up, shouldn't there be some kind of estimate under various scenarios that inform them of how much savings can be expected?

(5) Will new tenants/buyers moving in be billed for a portion of the infrastructure already existing? Do owners of vacant structures pay sewer fees? Also, does this study address the problem of unanticipated change orders for any system selected? RRCSD had about 30 change orders and the supposed $13 million dollar system turned out to be $30 million. Thankfully, most of the funding was provided by the State and Federal governments. What would the governing entity do if that happens?

(6) Addressing environmental impacts and the costs of addressing them with EIRs and other environmental studies (especially on the fishery) appear to play no part in the analysis, and impacts of system failures affecting recreation and/or other uses, were not addressed. (we may have missed it.) Who pays for costs of system expansion? To what extent must current ratepayers chip in? How is it determined?

(7) Also, prior stakeholders paid large amounts to maintain and improve system. If another community reaps the benefits, what do they contribute to the facility that was partly paid for by original ratepayers?

(Following notes taken from Chapter 2 of the HMP Study. (Service area and Wastewater Characterization)

Page 44 **Hazard Mitigation *Plan*** *....pump stations and equipment including pumps and controls, can potentially be damaged in the event of a flood. It is important to ensure that all electrical components are elevated above the 100-year flood plain."* Is this included in Regionalization Study?

2. "*Climate change may cause more extensive flood problems due to possible sea level rise and more severe weather patterns. Consequently the 500-year floodplain inundation area may become a higher probability risk, and the WWTP subject to floods*." January 6-8, 2026 was a "King Tide" and therefore far more dangerous even though the river didn't flood. What were river levels at Jenner when spill occurred? How will such problems be addressed? Also, if significant amounts of sewage invade the Estuary, is the District legally responsible? Can property owners downstream sue the District?

Back to Chapter 2: Regionalization (page 2-4)

12 SSOs since 2019: please describe/also penalties?

RRCSD plans to replace 3 force mains & upgrade lift stations to improve resiliency and repair deficiencies. This will also address flooding although high peak influent flows to plant are expected to continue. Question: Plant was upgraded to 4.5 MG capacity during high flows and may possibly go up to 5.0 million gallons. How is it that you are confident that this will serve all flows especially during flood periods? Both ponds hold 4.5 million gallons. How is this adequate to allow for 5.0 capacity? How does the recent spill fit into this assumption?

RRCSD ratepayers barely qualify for DAC (Disadvantaged Community) which helps provide funding for all the improvements needed by the system. Not everyone answers the questionnaire and with all the new hookups possible, it would not be difficult to lose funding from that program

to do necessary repairs to the system. What would happen to grant funding if hooking up is required for all area septic system properties after conducting a new income survey? We realize this probably has not been calculated for this Study, but does that skew the information when it gets included later?

Middle of page 2-7 it states that "…*Peak Day flows through the WWTP can be equalized to 5.0 mgd with use of existing Emergency Storage Pond. If a 0.4 EQ basin is also available, flows can be equalized to 4.2 mgd.*" Assuming this will address growth factor, what will address growth to system if area septic systems are also hooked up to system. And here is a big problem. You are utilizing any minimal existing growth capacity for future growth, but apparently none for transitioning septic systems to central sewer.

Another thing: Guerneville is a very difficult place to determine growth factors. I have lived here about 47 years and have not experienced extensive growth impacts although there has been a lot of rehab done on existing structures. It takes me the same time to drive to Santa Rosa along River Road as it did 47 years ago (about 18 miles). There are relatively few traffic backups when travelling that stretch. Our area is very much a summer community still. All winter there is almost no traffic between Guerneville and Rio Nido (2 miles) and in the summer, it can take 20 minutes to get into Guerneville from Rio Nido. Granted, not all of that is local traffic.
Other factors:

- Still a lot of second homes here with owners coming mostly in summer time
- A lot of vacation rentals that are sometimes occupied and sometimes not. Often they aren't occupied much in winter
- None of the various districts in our area have the same boundaries as RRCSD so you can't easily compare population changes
- There has been a lot of upgrading in our area but not much new building.
- We have floods, landslides, fog, penetrating cold in the redwoods, sewage spills, little sunshine in our redwood canyons most winters, and it's not much fun here in wintertime, minimizing population numbers but not raw sewage spills.
- Dry weather flows have stayed fairly even in the 43 years the system has been on line.

For all these reasons, we would question the growth rate projections.

In terms of the influents loads, for a long time after system was on line, there were numerous properties not hooked up to sewer. EPA put pressure on the District to hook everyone up and loads went up as well. There was lots of upgrading of resorts and visit serving businesses and that would make summer loads also go up. If units are sitting empty during low winter flows, the rate could stay low as well (compare inflow to drought years and with rainfall levels: much of the flow may be I&I.)

I don't think there was a very well documented growth rate analysis in this document as a result of ignoring so many population and influent factors. Also, strangely, summer flows never increased much over the years. Supposedly they average about 300,000 gpd, which is less than half of capacity and not much higher than the 250,000 that used to be common many years ago.

It seems like the analysis of BOD/TSS at the top of page 2-8 is oversimplified in terms of loading during high flows. More details and comparisons are appropriately being called for by the author of this section.

Statement on page 2-8: "*The RRCSD WWTP experiences significant I&I, which should cause a decrease in BOD/TSS concentrations due to this diluting effects of this flow contribution to the sewer system. However, samples with elevated BOD/TSS concentrations have been collected during wet weather events."* Regarding the spill of January 6th of this year, they tell us that 5.5 million gallons of sewage spilled into the river. Yet somewhere we also saw that downplayed by a statement that claimed most of the spill was diluted with rainwater. Was this true? How can it be measured?

Comment 31

Yet, what does it tell us if elevated BOD/TSS is in the influent and the spill appears to be from the Treatment facility even when there is no flood? Can massive I&I occur when the river is below flood stage? What was the BOD/TSS of the sewage that got into the river downstream on that date? Was there any dilution factor at all? We are confused by this and look forward to an explanation, since 5.5 million gallons is many times the number of gallons of total spills into the system which has seen many (at least 19 just since 2019)

Top of Page 2-11 mentions storage, which I was wondering about and explains how they manage it. I still don't understand how they handle high flows if they have a constant 4.5 inflow. There is a 3.5 mg storage pond which takes care of part of the inflow. The 1.0 mg is for equalization during high influent flow and inadequately treated wastewater that has to be retreated. And this storage remains constant and the flows don't go higher? Then there is the third unused aeration basin provides 0.4 of emergency storage. IS THIS REALLY ADEQUATE DURING HIGH FLOODS? I don't have the expertise to address this, but I really believe that high winter flows are unpredictable and operators should not rely on what sounds like a tight squeeze.

On page 2-13 there is a note saying the following in regards to limits to future reliance on the 400 acre parcel recently purchased by the County on which sits RRCSD: "*This site does include a conservation easement limiting uses of the site, and the topography of the site also presents challenges for installing new irrigation infrastructure."* There needs to be a lot more study of this situation before relying on the "Burch" property for future irrigation expansion.

Another issue in this section regarding the site serving the RRCSD Treatment Plant: we have always been told that the site is OUT of the flood plain. We know in the past there has been overirrigation of the Clar tree, any discussion about expanding irrigation in the lower field needs to address this issue. Also there had been (and still are) concerns about allowing irrigation water to seep into the groundwater, especially at lower irrigation site, and somewhat at all irrigation areas. This limits the amount they can irrigate in any one area and with additional hookups, overirrigation could occur. This needs to be carefully analyzed and a range of options provided. It may be helpful to provide a map of the irrigation areas that shows elevations of the various hillsides on the property.

RRCSD Regionalization Opportunities and Constraints

It seems as though treatment plant staff are pushing the limit with this system and it's impossible to know if they are using good judgment in light of the historically high number of SSOs during the life of this project. The limited certitude of staff's judgment is evident in the following statement at the start of this section on page 2-15.

"*The WWTP could likely manage increased influent loads. The RRCSD Treatment Plant Master Plan indicates maximum month influent BOD loads could increase to approximately 3,650 lb/day (2) and equalized peak day flows could increase to 5.0 mgd with use of existing Emergency Storage Pond. If 0.4 MG EQ basin is also available, peak day flows can be equalized to 4.2 mgd*."

So unless more accurate predictions of global warming storms could occur, how reliable would this management policy be? This spill two weeks ago was a total surprise. Was the system being run at the peak of its capacity when the spill occurred? Is it wise to run a system at its peak during unpredictable weather periods? (It seems that the amount of spill went way beyond what weather predictions would have expected.)

The Sonoma County Water Agency is very proud of their weather forecasting system that predicts when its best for Army Corps of Engineers to make winter releases from the dams. Why aren't those skills applied in this situation? And if our problems were strictly caused by local conditions, why can we not get better knowledge about the details of the situation? We also want to throw out a question from left field: Are there enormous rainfall and other weather conditions (wind, temperature, etc.) differences because of the vast geological contrast between Graton/Forestville and RRCSD?

We have mentioned before and the circumstance appears here (p.2-15) where there are many septic systems within two miles of RRCSD that may need to be hooked up to the system. Again we mention the possible conflict between flow additions from new growth and those from septic system additions which appear to be in conflict with one another in terms of treatment plant capacity allocations. If this is so it appears to make this study deficient, since cost figures and plant design are critical aspects of the project. The consultant is attempting to fulfill the contract as written as indicated in the bottom half of page2-15.

Comment 36

This constraint is mentioned on this page and claims some MINOR hydraulic conveyance improvements are needed, but do not mention details of what this would include or cost figures of doing it. We don't know what this would entail or for what populations it would serve. It goes on to mention other changes that would be needed, but our same concerns apply. Why are they not part of the project? How many other problems are inadequately addressed for which no other remedies have been sought but perhaps should have been.

This section admits to limited storage and states opportunities for possible expansion of current storage are limited. We believe that this should have been analyzed. There are also limited possibilities for expanding wastewater reuse near the facility. Costs for such projects and funding availability are also unknown. And as we already pointed out, there is limited ability to expand system on the 400+ acres recently purchased because of many constraints on the use of the property by the existing conservation easement.

GCSD Service Area and Facilities:
RRWPC has limited knowledge about the Graton and Forestville facilities as we have not spent much time over the years becoming familiar with them. Because of this, we tend to support joining those two facilities, along with Occidental, as long as they can do so with community support and buy in. We support this provisionally because we have had the experience of late, going through old newspapers, of reading about strenuous opposition from local citizens opposing various plans by local officials to make changes to these systems. On the surface, we think it would be reasonable to join these systems together, BUT ONLY if local citizen concerns are fully addressed. (See page 2 of these comments.)

We don't think RRCSD should be involved however, nor our local community, since our system is far from the others in distance, it exists in a harsher environment, it's much larger and complex, and would probably be much more expensive to implement 1b or 1c options. In fact, initially we supported ONLY option 1a and now we are not even sure of that, because of the recent RRCSD 5.5 MG spill a few weeks ago. Due to limited time and knowledge, I will continue to comment only on those sections dealing with RRCSD.

We do have one question however, from a footnote on page 2-23 in Table 2-9: Note (a) on the bottom states: *Value shown in peak daily flow. Peak influent flow could be 2 to 3 times this value (or higher).* We thought "peak daily flow" was the same as "peak influent flow". What is the difference between the types of flow? Also, how do you calculate rain water amounts on the ponds, if you do? If you don't, how do you calculate amount of discharge during a rainy period? (What consideration is there for rainwater intrusion? When rainwater joins wastewater, isn't it all considered waste? I there a dilution factor given. If so, what is it? If the rainwater has already been contaminated, and/or becomes contaminated by the spill water, what difference does it make how many contaminants are in it? It's been polluted and it all should be counted as the same toxic fluid. This comes up a lot in the spill documents and often the penalty gets lowered using this situation as an excuse.

I have question about water use and generation of sewage. How is the number of gallons per ESD calculated as summer flows are still relatively low? (RRCSD averages 120 gpd) What are 'average' numbers based on?

Also, Table 2-17 on page 2-40 states that RRCSD has 3,621 ESD's. But the number of properties is about 2600. Are there 1,000 ESD's that are part of multi-unit facilities or commercial establishments needing several ESD's such as restaurants?

Comments regarding RRCSD in Chapter 4: Preferred Alternatives
RRWPC will only address cost issues for RRCSD and even then in a very limited way. We believe that too much is left out of the analysis (as described earlier) to make cost figures meaningful. RRCSD is an old system that needs so many repairs and improvements and only part of it estimated in engineering studies, the numbers would probably be worthless and misleading. We do credit the authors however, on being open about limitations of the analysis.

Comment 43

Page 4-12: What's the difference between effluent storage ponds and equalization basins?

Page 6-11: Allowable Discharge Flows in Dry Years

I have the following issues on this page:

- To determine discharge: the Basin Plan does not allow flows over various years to be averaged in order to determine amount of discharge allowed. It's my understanding that any discharge is based on the flow that day.
- Discharges are not allowed at all between May 15th and October 1st which is the time of greatest amount of irrigation. The whole point of irrigation is to avoid discharge in the summer months. The irrigation capacity discussions are unclear.
- During the time of most irrigation demand, no discharge is allowed.
- Irrigation systems are to be managed so as to avoid all discharge.
- This is especially important in very dry years when irrigation is very limited. It is also a time when water allocations are strictly enforced and not as much wastewater is produced.
- In most dry summers and for Santa Rosa in many summers, irrigation in the Laguna is not utilized in order to meet contractual demands by the Geysers Project.
- If what is being determined is the irrigation demand during various wet and dry years, and the extent to which it will use up stored water, I'm having trouble seeing the problem. During summers coming after dry years, the demand can be huge and less water may be available. But that is not a problem for treatment plants when you don't have the water to give away. During summers coming after wet years, there may be less demand, especially with grapes, but I'm not sure how you quantify the problem in so far as the wastewater ponds are concerned. It seems like a cold cloudy summer after a very wet winter, and with no discharge allowed, may be the biggest problem of an irrigation season from the view of the discharger. But I can't be sure that is what is being discussed here. It seems they were more concerned about having too little irrigation water available. I'm in no way an expert here and would appreciate a better explanation. I know I did track Santa Rosa's and Rohnert Park's irrigation practices for a while and learned about some of their problems. Nevertheless, I don't see why the wastewater treatment systems should be overly concerned about too little wastewater available dry summers.

Chapter 9: Findings and Recommendations

This chapter includes the following conclusions regarding RRCSD:

"The RRCSD WWTP is an advanced treatment facility that provides a high-level of treatment allowing for surface water discharge to the Russian River. Continued local treatment and reuse at RRCSD is recommended for the following reasons:

- *The RRCSD WWTP has surplus capacity to accommodate flows from local unsewered community clusters. These findings are supported by the Master Planning effort being concurrently completed."*

  RRWPC agrees with this only on the condition that all upgrades identified in the collection system, the pipelines, and the Treatment Plant are fully repaired before plans are made to make other hookups. Also, the treatment and collection systems need to be able to accommodate all flows at all levels experienced so far.
- "*Some condition-related improvements have been identified for the facility, requiring a relatively modest investment in the next 20 years compared to the cost of wastewater export*." It would be helpful to briefly name those amounts here.

- "*The majority of the RRCSD WWTP would maintain resiliency in a 100-year event even under projected climate change conditions*." This is true according to flood plain measurements. But what about landslides and other geographical hazards, and groundwater intrusion (which was a problem for some discharges in the past) and seismicity of the parcel and river? I don't recall these hazards being addressed. In fact, any future document should incorporate concerns in the Hazard Assessment
- "*The RRCSD WWTP and identified nearby unsewered community clusters are relatively isolated within West County, whereas the FWD WWTP is about 10 miles away and both the Windsor WWTP and Laguna WWTP are about 20 miles away."* We agree with this entirely. It is a good reason to keep things where they are.
- *"RRCSD has existing land application area that could be expanded. RRCSD has also recently acquired nearly 400 acres of nearby forested area on which an additional modest expansion of the existing reuse system could potentially occur.*" There needs to be a study looking at this more closely. It's not clear what is available geologically or legally in the Conservation Agreement.
- Finally, there has been no mention that approximately the last mile on Neeley Road before reaching the Treatment Plant, has houses that are still on septic systems and probably would not be able to hook up to the sewer system for reasons of which I am unaware. There may be an engineering justification for this that should be mentioned.

Brenda Adelman for RRWPC

"

Charles Hardy

From: Andrea Rodriguez <Andrea.Rodriguez@scwa.ca.gov>
Sent: Monday, January 5, 2026 9:59 AM
To: David Coleman
Cc: Sophia Grubb; Parastou Hooshialsadat; Steve Koldis
Subject: RE: Comment on Draft Feasibility Study Report

Dear Mr. Coleman-
Thank you for your comment on the Draft Water Quality and Recycled Water Supply Feasibility Study. It has been received and will be shared with the study team.
Please let me know if I can help with any additional information,
Andrea

From: David Coleman
Sent: Friday, January 2, 2026 4:58 PM
To: Andrea Rodriguez
Cc: Sophia Grubb ; Parastou Hooshialsadat ; Steve Koldis
Subject: Comment on Draft Feasibility Study Report

To whom it may concern,

As the Principal of Brelje & Race responsible for the *Monte Rio and Villa Grande Wastewater Solutions Project Alternatives Development and Analysis* referred to as the Monte Rio Study Report and referenced in Chapter 8 of the Draft Feasibility Study Report, the following comment is offered:

The first paragraph of page 3 of Chapter 8 of the Draft Feasibility Report states “Very little detail is provided regarding the development of the cost estimates that are included in the Monte Rio Study Report, and it is unclear whether the costs are representative of the construction cost or the total project costs[1].” With the footnote stating “The Monte Rio Study Report initially labels the costs a construction costs, which implies they do not include non-construction project elements such as engineering design and permitting. However, in other areas of the report, the costs are presented as project costs, which implies these elements are included.”

We are not aware of any contact from the report author to confirm the nature of the cost estimates included in the draft Monte Rio Study Report, and we believe Sonoma Water was aware that costs presented in the report were construction costs, rather than project costs. On December 19, 2025, a draft of the Monte Rio Feasibility and Preliminary Design Report was submitted to Sonoma Water for review. This draft report presented project costs as requested by the agency.

Thank you,
Dave

Dave Coleman, P.E.
Senior Principal
Brelje & Race CONSULTING ENGINEERS
Water | Wastewater | Site Development | Land Surveying | Planning

Charles Hardy

From: Andrea Rodriguez <Andrea.Rodriguez@scwa.ca.gov>
Sent: Monday, January 5, 2026 9:56 AM
To: dyatesc@aol.com
Cc: Parastou Hooshialsadat
Subject: RE: Comment on Draft Feasibility Study Report

Hi Mr. Coleman-
Thank you for your comment on the Draft Water Quality and Recycled Water Supply Feasibility Study. It has been received and will be shared with the study team.
Please let me know if I can help with any additional information,
Andrea

From: dyatesc@aol.com
Sent: Friday, January 2, 2026 4:59 PM
To: Andrea Rodriguez
Cc: Parastou Hooshialsadat
Subject: Comment on Draft Feasibility Study Report

Hello,

I am a resident and property owner in Forestville and also a property owner that is connected to the sewer in Guerneville. I happen to be the District Engineer for the Forestville Water District; however, these comments are my own and do not necessarily reflect the position of the Forestville Water District.

The report appears to be thorough and intricate with much information considered and analyzed. I have not been able to thoroughly review the report in a technical sense or to review capital cost or operating costs estimates other than on a relative basis.

However, some conclusions of the report don't seem to make sense with the realities that are inherent in operating small wastewater districts.

Most stakeholders are aware of the financial challenges that these small wastewater districts such as Occidental, Forestville, Graton and even Guerneville have faced since fixed costs have to be covered by a smaller user base. The regulatory burden associated with seasonal storage and discharge are a large reason for the high operating costs for these small systems.

Comment 52

My understanding is that one major objective of the report is the exploration of regionalization concepts to "improve water quality, water supply reliability, Pathogen TMDL compliance, and climate change resiliency in the Russian River watershed, **and address ratepayer costs for West County wastewater systems** [emphasis added]."

Economy of scale is possible by combining small systems – and this is being pursued currently on the Occidental/Graton and the Graton/Forestville fronts. This will most likely result in lowering operating cost pressures on a per-user basis for each of these three small districts.

This is reflected in the estimates presented in Table 8-60, Summary of Annual Rates per ESD, of the report – which demonstrates that user rates could be less for the combined users of Occidental/Graton/Forestville compared to their respective existing rates, if these systems are combined (Alternative 1a). Further economy of scale is predicted if the flows of Guerneville are added – resulting in a 50% reduction in estimated rates (Alternative 1c). However, a larger economy of scale of the TOW and LTP regionalization alternatives (Alternatives 2a and 2b) is NOT predicted for these alternatives. In fact, the user rates for each of the West County districts are estimated to be higher with these alternatives. Evidently, this is due to different O&M cost estimating methods employed for these alternatives – where treatment costs were cited by officials of those treatment plant agencies as compared to operating cost estimates for West County districts calculated more empirically by the study authors.

Comment 53

There are 5 preferred approaches that are identified out of the original 8.

Due to the rating system employed, Alternatives 1b (all West County flows to the Guerneville plant) was eliminated whereas Alternative 1c (all West County flows to the Forestville plant site) was brought forward. However, it would seem that expanding the Guerneville plant to accommodate Occidental/Graton/Forestville would be more practical than expanding the much smaller Forestville plant to accommodate the larger flows from Guerneville. Also, Alternative 1c would involve a new treated effluent outfall to the Russian River from the Forestville plant; whereas Alternative 1b would not have required a new discharge point. Conveying the wastewater flows from Guerneville to Forestville and discharging the combined volume (more than double) of treated effluent just downstream of the Steelhead Beach Park would not be a popular proposal. It is not lost on the undersigned that currently treated effluent from the Forestville plant is ultimately discharged to the same point of the Russian River (via Jone Creek and Green Valley Creek), but the additional discharge and the physical construction of the discharge facilities would still be unpopular in the local area.

Hybrid Alternative 3b (Guerneville to Windsor and Occidental/Graton/Forestville combined at Forestville) is a preferred alternative. This does not make practical sense as the pipeline from Guerneville would pass through Forestville (less than 2 miles from the Forestville plant) on its way to Windsor. Why wouldn't that regionalization facility (the pipeline) be used to its fullest extent?

It appears that subjective scoring criteria seems to be biased against continued use of the Guerneville plant and contradictory to conclusions reached in chapter 9.

For example, Alternative 1b has the lowest Resiliency score due to "reliance on a treatment facility that is near the Russian River and thus particularly vulnerable to seismic and flooding impacts". However, it is not demonstrated that the Guerneville plant has a flooding issue or is more prone to seismic activity.

Also, Alternative 1b has the lowest Long Term Regulatory Compliance score due to "the ongoing compliance issues at this site related to management of peak flows." However, the compliance issues

related to peak flows at Guerneville are largely due to the condition of the collection system – which will remain in use under any alternative. Regional loads to the plant can be connected directly to the treatment plant or to an improved and robust end of the collection/conveyance system. It seems that bringing the peak flows from Guerneville to Forestville would bring more environmental risk due to the location of the facility in relation to a small tributary to Green Valley Creek.

In summary, everything else remaining equal, creating larger systems will allow a better economy of scale for both capital and operating costs. Arriving at an alternative that results in the continued use of small systems should not be undertaken lightly and regionalization alternatives should be considered as much as possible.

Thank you,

Dave Coleman, Forestville