

COMMENT LETTER 99 - SONOMA COUNTY CONSERVATION ACTION, MARK GREEN (OCTOBER 3, 1996), RECEIVED OCTOBER 7, 1996

Response to Comment 99-1

Comment Summary: The comment states that the Sonoma County Conservation Action group offers comments on the Draft EIR/EIS. The comment also states that the citizenry of the communities in the Subregional system feels proprietary towards the Russian River and would be willing to pay higher utility rates for reuse of wastewater rather than have greater discharge to the Russian River. In addition, the comment states that it would be possible to organize a constituency that would oppose the discharge alternative.

The comment expresses an opinion about Project selection. Please refer to Master Response 2, located in section 6.2 of this document

Response to Comment 99-2

Comment Summary: The comment states that it is unfortunate that the city has chosen to complete the EIR process prior to choosing a preferred alternative. In addition, the comment states that because a suit must be filed within 30 days after the vote to certify the EIR, the city has elected to force local environmental groups to bring suits against the city.

It should be noted that a suit cannot be filed until after an EIR has been certified, a preferred project chosen, and the Notice of Determination has been filed. In addition, the premise that a suit will be filed because the city has not chosen a preferred alternative at this point in the environmental process is not consistent with the CEQA process or the environmental process that has been conducted for this Project. The city has embarked on an environmental process for the project that involves not selecting a preferred alternative until after an EIR has been certified.

Response to Comment 99-3

Comment Summary: The comment states that the two most significant factors to the success or failure of the proposed project, the “invisible” environmental impacts threatened by the creation of excessive system capacity and the political viability of the options being considered, are not addressed in the Draft EIR/EIS.

The two issues presented by this comment are addressed below in Responses to Comments 99-4 and 99-5.

Response to Comment 99-4

Comment Summary: The comment states that the project proposes to use a 54 inch pipe for outfall into the Russian River for discharge. This size pipe is considered to be grossly in excess of what is needed and appears to lay the groundwork for another explosion of urban growth. The comment goes on to say that by limiting the analysis of growth-inducing impacts to those impacts that have been described by the current general plans, the Draft EIR/EIS does not truly consider the full scope of the environmental impacts of the project.

The best predictor of future growth for the Project area is provided by the current general plans (the EIR/EIS uses general plans in effect as of April 1994). CEQA also clearly identifies that this type of approach to addressing growth-inducing impacts is valid and acceptable. The sizing of the outfall pipe as a 54 inch pipe is needed for the Project since the pipe may have to carry up to 26.67 million gallons per day during wet weather periods. In addition, with this amount of water flowing through the pipe for several miles, the pipe needs to be engineered to this size to allow a reasonable pumping horsepower to overcome frictional losses in the pipe. It is possible that the pipe may ultimately be sized as a 42 to 48 inch pipe if the amount of flow can be reduced through other mechanisms. However, the Draft EIR/EIS takes a conservative approach in order to evaluate the greatest magnitude impact that could occur with the Project. The sizing of the pipe is not related to sizing for any future growth beyond that described in the general plans of the various subregional wastewater system member entities.

Response to Comment 99-5

Comment Summary: The comment states that the City of Santa Rosa should have taken into account the political viability of the various project alternatives, and has, therefore, wasted taxpayer money and time in proposing projects that can never be built. The comment provides the Alternative 3 (West County) as an example. In addition, the comment states that the Draft EIR/EIS has promoted a "shooting war" between the communities of the lower Russian River drainage and the City of Santa Rosa because of claims of least environmental impact from the proposed discharge to the river, ignoring long-term impacts of additional infrastructure.

It is not possible to eliminate alternatives from consideration because they are the subject of some political opposition. Every alternative is opposed by some individuals or groups. To comply with requirements of NEPA and the Corps of Engineers 404 (b)(1) alternatives analysis requirements, all feasible alternatives had to be evaluated. Under these regulations, political objections are not an acceptable reason for excluding an alternative from environmental review. The Environmentally Superior Alternative is discussed in Section 5.5 of the Draft EIR/EIS, starting on page 5-22. Increased Russian River discharge is environmentally superior because it can be accomplished without construction of large physical facilities, and thus has relatively few environmental effects. It is not possible to build dams, pumpstations and pipelines without significant environmental effects. Please refer to Response to Comment 99-4 for discussion of long-

term impacts of additional infrastructure because of the Russian River discharge alternative.

Response to Comment 99-6

Comment Summary: The comment states that the Draft EIR/EIS is flawed in details and in approach.

The comment does not present specifics about the perceived flaws in the Draft EIR/EIS. Therefore, no further response can be provided.

