

**COMMENT LETTER 303 - MARTIN GRIFFIN MD., MPH, (OCTOBER 6, 1996),
RECEIVED OCTOBER 11, 1996**

Response to Comment 303-1

Comment Summary: The comment states that oral testimony was given at the public hearing and should, in addition to the letter, be a part of the record.

Testimony at the public hearing is part of the record and responses to public hearing comments are provided in the Final EIR. Refer to Responses to Comments 235-222 through 235-224.

Response to Comment 303-2

Comment Summary: The comment states that the Russian River is being destroyed by single purpose planning involving actions related to wastewater disposal, inflated increases in drinking water diversions, channelized tributaries for polluted stormwater runoff, and strip-mining and dredging gravel.

The analysis of cumulative impacts in the Draft EIR/EIS considers all of these types of projects. Refer to Appendix D-31 (Cumulative Projects List) of the Draft EIR/EIS for a list of cumulative projects.

Response to Comment 303-3

Comment Summary: The comment asks for an explanation as to why alternatives would not worsen flood damage or flood, overtop or contaminate SCWA intakes involving Russian River discharge.

As explained in Appendix G-1 (Potential Flood Impacts in the Laguna de Santa Rosa Floodplain and Russian River Floodplain) of the Draft EIR/EIS, none of the Project alternatives will affect the existing reclaimed water discharge rate during high flow conditions. Also Refer to Response to Comments 85-82 and 85-83. Analysis of cumulative impacts has concluded that future development in the Project area is likely to worsen flooding impacts (refer page 4.4-34 of the Draft EIR/EIS) and thus Mitigation Measures 2.5.10: Discharge Prohibition During Flood Stage on page 2-137, is proposed. This will avoid any contribution by the Project to cumulative flooding impacts. Section 4.7 of the Draft EIR/EIS concluded that "Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources and would not adversely affect human health via other potential exposure pathways" (refer to page 4.7-61). Neither direct nor cumulative impacts are predicted.

Response to Comment 303-4

Comment Summary: The comment asks why project alternatives won't add to the existing problem of repetitive flooding in the Russian River.

Refer to Response to Comment 303-3.

Response to Comment 303-5

Comment Summary: The comment asks that cumulative flood impacts of the project and instream gravel mining, pit mining, stream channelization be evaluated.

Gravel mining has lead to downcutting of the River channel during high flow events. Appendix G-2 (Potential Streambank Erosion-Laguna de Santa Rosa and Russian River) of the Draft EIR/EIS shows that none of the Project alternatives will affect the existing reclaimed water discharge rate during high flow conditions. The Project will thus not worsen any of the existing conditions described in the comment. Refer also to Response to Comment 303-3.

Response to Comment 303-6

Comment Summary: The comment states that the description of gravel mining is inadequate and the EIR/EIS does not address River downcutting, instream extraction of gravel nor the cumulative impacts of abundant pits.

Refer to Response to Comment 303-5.

Response to Comment 303-7

Comment Summary: The comment states that the Draft EIR/EIS does not address the new SCWA EIR and the need for new sites for water collectors and infiltration ponds opposite the proposed Russian River outfall for the Project.

The water quality analysis in the Draft EIR/EIS (pages 4.6-90 through 4.6-130) does not address the water quality at each specific intake along the Russian River but is specific to the type of intake. Also, please refer to Responses to Comments 14-2 through 14-7 pertaining to the water quality at intakes along the Russian River. Projects proposed by the SCWA are included in the analysis of water quality impacts. Refer to Table 4.6-51 starting on page 4.6-134 of the Draft EIR/EIS.

Response to Comment 303-8

Comment Summary: The comment states that the Draft EIR/EIS does not address the potential cumulative impact on the quality of drinking water from wastewater, stormwater, watershed erosion, and substrate compaction.

The cumulative impacts sections of the groundwater analysis and the surface water quality sections (pages 4.5-56 through 4.5-57 and 4.6-130 through 4.6-148) of the Draft EIR/EIS address these issues.

Response to Comment 303-9

Comment Summary: The comment states the opinion that actions by the “Santa Rosa Sanitary District”, the SCWA, and the RWQCB will make down river flood damages worse and cost upriver ratepayers in class action lawsuits. The comment urges non-discharge to the Russian River and to curtail growth along the State Route 101 corridor.

As explained in Responses to Comments 303-3 and 303-5, the Project will not worsen flooding conditions, because of the manner in which discharge occurs. It is not within the scope of the Subregional System to manage growth. Growth management occurs through the General Plans of the Subregional System members.

Response to Comment 303-10

Comment Summary: This comment consists of a letter report prepared for the Westside Road Wineries Russian River Task Force by Robert Curry and John Leys (1994) entitled “Russian River Middle-Reach Aggregate or Aquifer?,” used as an attachment to Comment Letter 303.

The comment is a report on gravel mining in the Russian River and appears to be submitted in support of Comment 303-5 and 303-6. Refer to Response to Comment 303-5.

Response to Comment 303-11

Comment Summary: The comment consists of an article from Sonoma West entitled “Russian River on ‘threatened’ list once again” (dated April 24, 1996), used as an attachment to Comment Letter 303.

The article appears to be submitted in support of Comment 303-5 and 303-6. Refer to Response to Comment 303-5.

Response to Comment 303-12

Comment Summary: The comment consists of an article from The Press Democrat entitled “Steelhead listing as imperiled proposed” (dated July 31, 1996), used as an attachment to Comment Letter 303.

Refer to Master Response 12, located in Section 6.2 of this document, concerning the status of steelhead trout.

Response to Comment 303-13

Comment Summary: The comment consists of a figure entitled “Wastewater in the Russian River,” used as an attachment to Comment Letter 303.

The figure is apparently intended to express concern about drinking water impacts of reclaimed water discharge. The Draft EIR/EIS has evaluated discharge to the Russian River. Section 4.7 concluded that "Direct discharge of reclaimed water into the Laguna de Santa Rosa or the Russian River will not adversely affect water quality at drinking water sources and would not adversely affect human health via other potential exposure pathways" (refer to page 4.7-61).

Response to Comment 303-14

Comment Summary: The comment consists of a figure attached to Comment Letter 303 that indicates that a portion of the Russian River floodplain containing existing infiltration ponds is subject to flooding.

This comment was also submitted in Comment Letter 32. Please refer to Response to Comment 32-3.

Response to Comment 303-15

Comment Summary: The comment indicates that waste water and polluted storm water are currently being discharged via Mark West Creek into the Russian River and threaten to contaminate the drinking water for Marin and Sonoma Counties.

This comment was also submitted in Comment Letter 32. Please refer to Response to Comment 32-1.

Response to Comment 303-16

Comment Summary: The comment consists of a free-hand graphic entitled “Wastewater in the Russian River Flood - Drinking Water Areas,” used as an attachment to Comment Letter 303.

This comment was also submitted in Comment Letter 32. Please refer to Response to Comment 32-2.

Response to Comment 303-17

Comment Summary: The comment consists of a document entitled “Gravel Mining Litigation Landmarks: Russian River,” used as an attachment to Comment Letter 303.

The attachment appears to be submitted in support of Comment 303-5 and 303-6. Refer to Response to Comment 303-5.