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**CITY OF SANTA ROSA**  
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October 7, 1996

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Marie Meredith  
City of Santa Rosa  
Community Development Department  
P.O. Box 1678  
Santa Rosa, CA 95402-1678

**DEPARTMENT OF  
COMMUNITY DEVELOPMENT**

RE: Comments to Santa Rosa Subregional  
Long-Term Wastewater Project

Dear Ms. Meredith:

I am writing on behalf of Paul Claeysens, owner of 6018 Bloomfield Road, Petaluma, California. Paul Claeysens strenuously objects to Alternative 3B containing the Bloomfield Reservoir Site. A review of the typographic maps of the area and the proposed project reveal that Alternative 3B in fact results in the reservoir being physically located on Mr. Claeysens' property and also on the Sonoma County Open Space and Agricultural Preservation District protected easement property. Additionally, the structures necessary to support this reservoir will need to be placed on this private Claeysens property. This alternative would irreversibly damage this property and would be a public taking of 6018 Bloomfield Road. The areas not physically taken would be constructively taken by this proposal. Mr. Claeysens' property has been placed on the Bloomfield Reservoir site plan affixed to this report to show you the physical encroachment that would be created.] 001

We find it unconscionable and misleading to the public to not advise them of the actual land takings associated with the Bloomfield Reservoir Site alternative. The value of the Claeysens land and the cost associated with the taking are not disclosed in the economic impact section of the Draft EIR; and the effect on the lands already in the public easement area of the Sonoma County Open Space and Agricultural Preservation District are not addressed at all in the report.] 002

Even if the project were moved so as to not be physically on Mr. Claeysens' property, Mr. Claeysens has strong objections and comments on the specific of the information that is actually disclosed in the report.] 003

Mr. Claeysens disputes the claimed fact in the Draft Environmental Impact Report that the reclaimed water for irrigation 004

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will have a beneficial impact on the amount of prime farmland available in the area. Specifically, current land that is irrigated with waste water (politely termed "reclaimed water" in the Draft EIR) is severely negatively impacted by the waste water. It is common to hear from the farming community currently using your waste water that livestock refuses to eat grass irrigated by waste water and a crust forms on the soil. 6018 Bloomfield Road is the home to many horses who would be negatively impacted by the use of waste water for irrigation. 004 (cont.)

The Geology, Soils and Seismicity section of the EIR identifies that some South County reservoirs will experience accelerated siltation. This problem will also be experienced by the West County reservoirs (and Bloomfield in particular). The Bloomfield reservoir site is 7 miles from the San Andreas Fault and 19 miles from the epicenter of one of the most destructive and powerful earthquakes in recorded history. Although the Draft EIR claims that earthquake damage will be avoided if the facilities are constructed according to the requirements of the Division of Safety of Dams and the building codes, this statement is untrue based on historical observations. It is an irrefutable fact that in 1976 an earth filled dam similar to the one proposed for Bloomfield reservoir had catastrophic failure in and of itself, without the assistance of an earthquake. This dam in Rexburg, Idaho was designed and constructed under the supervision of the Army Corps of Engineers. Based on this catastrophic failure that occurred without any earth movement, it is irresponsible to construct an earth filled dam in an area prone to earth movements and earthquakes. It subjects the property, its users and the environment to extraordinary and unacceptable risks. Additionally, your claim in the Draft EIR that the public need not be concerned about dam safety because it will comply with building codes is misleading at best. There are, in fact, no building codes, either in the Uniform Building Codes or the California Building Codes, that relate to dam construction. 005 006 007

Your report points out that the West County alternative will degrade groundwater quality of existing and potential drinking water wells, and result in unacceptable nitrate levels in the reclaimed water. Mr. Claeyssens does not want his existing groundwater degraded. Similarly, the Draft EIR notes that leachfields will be affected. The suggested mitigation with non-conventional septic systems is extraordinarily expensive (i.e. in excess of \$20,000.00) and further requires more government regulation and intrusions. This is an unacceptable alternative for Mr. Claeyssens, who should not have to subject himself to either the cost or the intrusiveness of a non-conventional septic system. 008 009

The significant impact on the surface water quality is 010

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alarming and completely unacceptable. Your report admits that changes in salinity, ammonia concentration, dissolved oxygen, biostimulation, metals, nutrients, individual inorganic minerals and organic compounds will occur. The completely unacceptable risks these pose are evidenced by your own claim that mitigation will reduce some discharge impacts, such as those with respect to cyanide and turbidity. It is unconscionable that you would propose an alternative with these significant unacceptable health risks to individuals and livestock. The Draft EIR even admits that the water quality of the National Marine Sanctuary would be impacted and damaged without any ability of mitigation.

Mr. Claeysens is unwilling to risk an increased nitrate concentration to local water wells resulting from the migration of groundwater from reservoirs.

I'm sure that the entire community will join Mr. Claeysens in fighting against any West County Reclamation Alternative based on its impact on aquatic biological resources. The Draft EIR admits that dams at storage reservoirs will cut off flows downstream and significantly affect aquatic habitat and in fact cause irreversible alteration of the aquatic habitat in the esteros, a part of the Gulf of the Farallones National Marine Sanctuary. I believe that an independent investigation of this issue will disclose specific dangers not mentioned in the draft EIR.

Similarly, substantial acreage of wetlands will be destroyed by construction of the storage reservoirs in the West County Reclamation Alternative. Mr. Claeysens does not agree that man made wetlands are, or could ever be, a suitable substitute for natural wetlands. Mr. Claeysens has substantial scientific support for this viewpoint.

I believe that the loss of native plant communities will be greater than stated in Table 1-5. As there are 203 known cultural resources impacted by the Bloomfield reservoir alternative, this alternative is unacceptable.

The Draft EIR admits that the West County reservoir construction will generate unacceptable and significant emissions, particularly dust, nitrogen oxides and carbon monoxide. This will be damaging to the individuals on the property and the livestock and horses on the property and is unacceptable. Mr. Claeysens ardently disagrees with the claim that the project once completed will not have significant odor impacts. In fact, he believes based on his observations that the project will at all times have very significant odor impacts. Additionally, because the project is not agriculturally based, it is not exempt from having to comply with Sonoma County and Bay Area air quality controls. We believe

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that once completed the project would not be in compliance with air 019 (cont.)  
 quality controls, and therefore, even if it were built, it would  
 not be able to be used.]

[ Similarly, we believe that the noise impact will be 020  
 significant and a nuisance. ] Another nuisance will be created by 021  
 the project itself. A reservoir would be an attractive nuisance  
 for children that would have to be properly fenced off. Mr. and  
 Mrs. Claeysens' children would have to be protected if this  
 project were built.]

[ The visual impact of the project would be irreversibly 022  
 significant. The concrete line v-ditches that are necessary are  
 extremely unattractive. In the Bloomfield reservoir alternative,  
 the unsightly affects of this proposal would be adjacent to the 023  
 open space area Sonoma County recently claimed. ] I believe that  
 this factor would increase public concern over government spending,  
 as it is inconsistent for the government on the one hand to spend  
 money to preserve a specific area and on the other hand to spend 024  
 money to destroy the visual beauty of that same area. ] In addition  
 to the visual impacts you disclose, there would be a need for  
 fencing and other public safety measures to prevent children from  
 injuring themselves by being attracted to the reservoir. In  
 particular, children would face the threat of drowning, illness,  
 contamination and disease, which could only be prevented by proper  
 fencing, which would be another visual blight caused by the  
 proposed project.]

[ Mr. Claeysens questions the economic analysis set forth in 025  
 the report for more reasons than its complete omission of the cost  
 of the taking of his property. ] As stated earlier, he believes that 026  
 the dairy forage production will be adversely impacted. ] There do 027  
 not appear to be any benefits associated with the West County  
 Reclamation Alternative. ] Additionally, you would have to bear all 028  
 costs to the Claeysens of all damages and costs they may incur if  
 this alternative were chosen.]

[ Additionally, as the Draft EIR notes, the waste water that 029  
 will be used for irrigation will not be limited to human waste.  
 Rather, there is industrial waste in the water, which discharges  
 metals and other contaminants. Once these contaminants get into  
 the soil, the soil is severely adversely impacted.]

[ Finally, as stated above, our analysis completely disagrees 030  
 with the Draft EIR claim that the risk of dam failure is extremely  
 remote. Rather, we believe that the risk of failure in an earth  
 filled dam and its resultant flooding is extraordinarily  
 unacceptable. Earth filled dams are prone to failure for reasons  
 that are not understood even by those would construct them. Mr.

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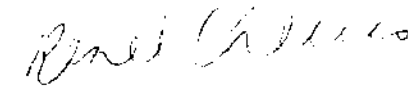
Claeyssens property is currently in a safe area. The Bloomfield reservoir alternative would place this property at significant risk of the flooding that results from dam failure. 030(cont.)

In conclusion, the Bloomfield reservoir should not even be considered as a viable option for the wastewater project. It would be an actual taking of Mr. Claeysens' property. Additionally, the damage to the affected area would be unreasonable, severe and irreversible. Because of erosion, the dam will, in time, silt up and be unusable. Therefore, the Bloomfield reservoir alternative at best provides only a short term solution for the problem at an unreasonable economic and environmental cost. Choosing this option would be a taking of 6018 Bloomfield Road without serving any public purpose. An analysis of project alternative 3B demonstrates that any public benefit would be materially outweighed by the unacceptable and permanent detriment to the environment that would be caused by this choice. 031  
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033

The above objections are based on what was disclosed in the Draft EIR. As the very material fact that alternative 3B would result in an actual taking of Mr. Claeysens' property and the Sonoma County Open Space and Agricultural Preservation District Easement was not disclosed in the report, we question the entire report for its accuracy and completeness. To the extent that you are still considering Alternative 3B a viable alternative after receipt of these comments, we reserve all rights to make further comments based on our discovery of new information and our further investigation of purportedly disclosed information. 034

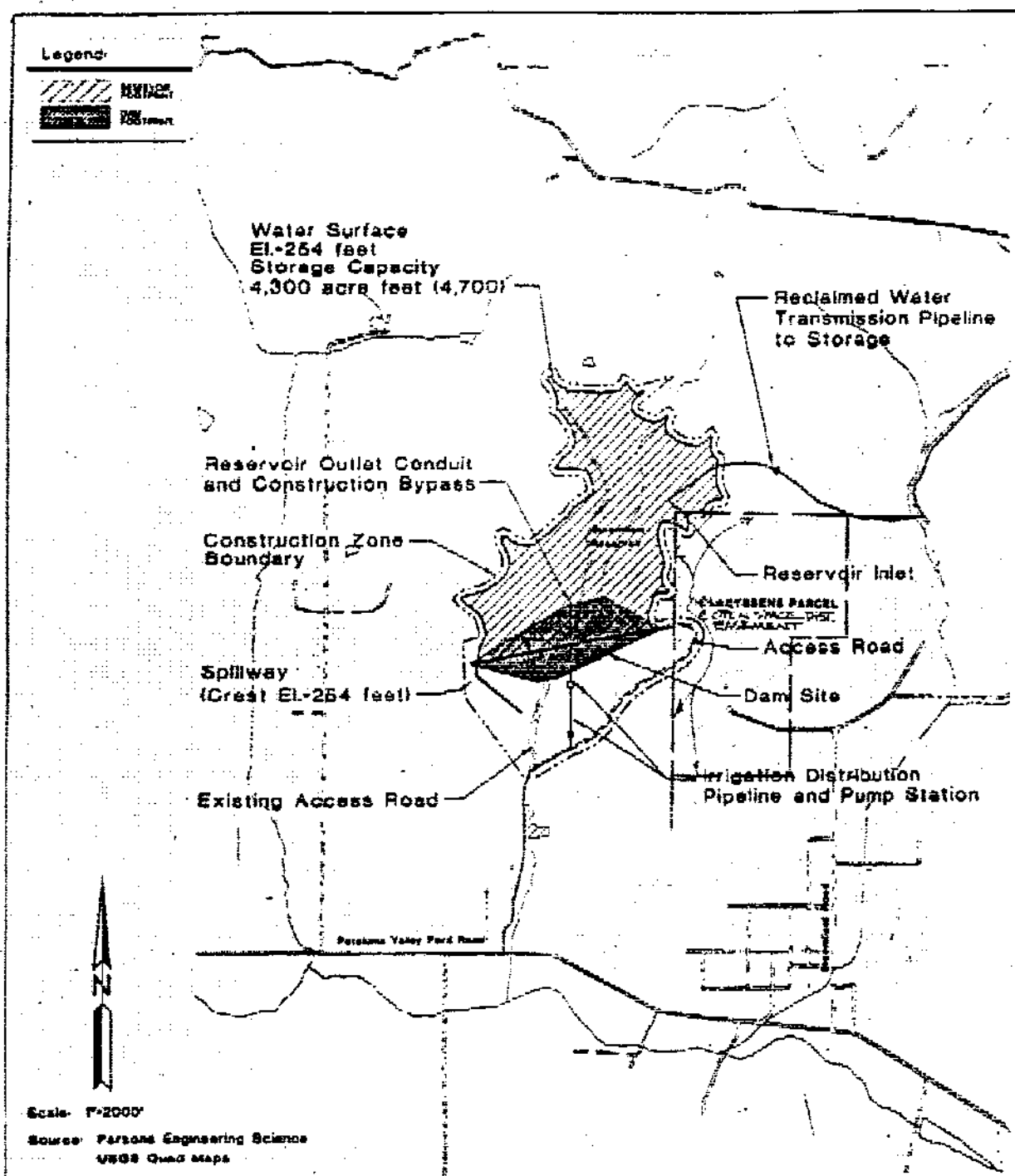
Thank you for your consideration of this information.

Respectfully submitted,



Renee R. Chernus

cc: Paul Claeysens  
Robert Clark



HARLAND BARTHOLOMEW and ASSOCIATES, INC.

CONSULTING ENGINEERS AND ARCHITECTS



Subregional Long-Term  
Wastewater Project

Figure 3.3-7

BLOOMFIELD RESERVOIR