



Madrone Audubon Society
INCORPORATED

LETTER 94

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

OCT 07 1996

DEPARTMENT OF
COMMUNITY DEVELOPMENT

TO: Community Development Dept.
City of Santa Rosa, Ca.

ATTEN: Marie Meredith

SUBJECT: EIR/EIS FOR THE SANTA ROSA SUBREGIONAL WASTEWATER PROJECT

DATE: October 6, 1996

This document in its many volumes is imposing and full of data, but its material has not been presented in a user friendly manner. In a document intended for public use this is a serious flaw. In fact it carries a strong implication of having been compiled in a deliberately long winded, involved and obfuscatory style in order to make comprehension difficult for the lay public and thereby discourage the citizen participation in the review process which is required by law. Therefore we question the validity of the document as a whole. 001

No one can dispute the high quality of the water generated by the current treatment system. It is what use is to be made of this valuable resource in the long term and how that goal is to be reached which still have not been adequately addressed. For instance: 002

1. No clear sampling plan is evident in the presentation of the data, and sampling data does not always state date and method of analysis. 003

2. Although the document addresses the current discharges of eight other entities into the Russian River, there is not adequate consideration given to the water quality degradation from these less sophisticated systems. While their maximum flows only range from .3-3.0 MGD, and that pales in comparison to the current 18 MGD of the subregional system, there should be an analysis of the potential for synergistic degradation of the total river system water quality. 004

3. Impacts to area tourism are minimized or overlooked completely. Our tourism industry is an important aspect of our local economy. Yet there seems to be no analysis of the tourist customer profile that quantifies the impacts that will be felt when tourists prefer not to use our river for their recreation due to health concerns or aesthetic preference. 005

4. The document uses a skewed timeline that discounts the many years of system development and public hearings previous to 1993 while looking to a future less than 15 years away. For this document to 006

P. O. BOX 1911 • SANTA ROSA, CALIFORNIA 95402 • PH. 707.546.7492



Madrone Audubon Society
INCORPORATED

EIR/EIS -- SUBREGIONAL WASTEWATER PROJECT (page 2)
10/6/96

have a real value, any alternative should not be obsolete before it is approved, much less constructed. We must look forward beyond 2010 in our planning. 006 (cont.)

5. The financial burdens inherent in each alternative are certainly a major factor in the selection process. Yet no adequate consideration has been given here to a pay-as-you-go method such as use of many smaller reservoirs which can be constructed as needed. Yet this might save the taxpayers millions of dollars in interest. 007

In conclusion, we reiterate our opening point. It is not sufficient to present only a brief Summary of the studies in a coherent format. The public is also entitled to a well organized comprehensible presentation of the data on which the Summary is based. That we do not have! 008

Respectfully submitted,

Linda Curry,
Registered Environmental Assessor