

SONOMA COUNTY CONSERVATION ACTION

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Thursday, October 3, 1996

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

OCT 07 1996

**DEPARTMENT OF
COMMUNITY DEVELOPMENT**

Marie Meredith
City of Santa Rosa
Community Development Dep't.
P.O. Box 1678
Santa Rosa, CA 95402

Dear Ms. Meredith:

On behalf of our more than 7,500 member households 001
countywide, and specifically of the more than 2,000 of them
that live in the city of Santa Rosa, Conservation Action offers
the following comments on the DEIR for the Subregional
Long-Term Wastewater Project.

Initially, an observation. Every year, Conservation Action
organizers knock on every accessible door in the communities
served by the Subregional Wastewater System. We can say
with confidence that the citizenry of the area feels strongly
proprietary towards the Russian River and is willing to pay
higher utility rates for reuse of wastewater rather than see
greater discharge to the River. It would not be difficult, should
the city choose to pursue an option which created the
infrastructure for significant increases to the population served
by the Subregional Wastewater System, to organize a
constituency which would vociferously oppose such a choice.

It is unfortunate that the city has chosen to complete the EIR 002
process prior to addressing the question of choosing a project.
In effect, 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.

We are deeply disturbed that the two most significant factors to 003
the success or failure of the proposed projects have not been
addressed in the DEIR: the "invisible" environmental impacts
threatened by the creation of excessive system capacity in the
proposed projects, and the political viability of the options
being considered.

A 54" pipe is proposed, for example, for outfall in the river- 004

discharge options. This is grossly in excess of what is needed, and would appear to be a deliberate laying of groundwork for another explosion of urban growth in the communities served by the system. The impacts of growth which would otherwise be impossible if not for the Subregional Long-Term Wastewater Project are, indeed, environmental impacts of the Subregional Long-Term Wastewater Project itself. By limiting its attention only to the growth allowed in the current general plans (or, in the case of Santa Rosa, in the case of the old general plan now replaced by the 1996 plan), the DEIR is not truly considering the full scope of the environmental impacts of the project.] 004 (cont.)

Because the CEQA process does not require a consideration of community sentiment, the city is not *required* to take into account the political viability of the various project alternatives. It would have been wise to do so, however, and has wasted taxpayer money and considerable time in continually investing efforts in projects which, from a pragmatic standpoint, can never be built. The West County alternative is an example: the only point of unanimity at the public-input workshops was opposition to an Estero dam. Yet we still find ourselves considering it here. 005

The DEIR, in asserting that discharge to the river would have the least environmental impact (having ignored the long-term impacts of additional infrastructure), has the net effect of promoting a shooting war between the communities of the lower river drainage and the city of Santa Rosa. No benefit to either community can result.]

Rather than engage in repetition, we leave it to our colleagues to document the deficiencies and gaps in the current DEIR. Suffice it to say that we feel that the current document is flawed not only in its details, but in its approach.] 006



Mark Green
Executive Director