

CITY OF SANTA ROSA
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DEPARTMENT OF
COMMUNITY DEVELOPMENT

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Re: Draft EIR/EIS 1996 Santa Rosa Subregional Long-Term
Wastewater Project

We require that you respond to the following comments on the
above-referenced Draft EIR/EIS in writing.

1. It does not appear that the Draft EIR/EIS meets its requirement for access of information to the public. The Draft EIR/EIS fails this requirement in two ways. 001
 1. The documents are unavailable. The cost for purchasing the 17 volumes of the Draft EIR/EIS (over \$1000.00) is prohibitive. Even the cost of 3 volumes (\$120.00) is more than many can afford, but is also irrelevant because a thorough study of the Draft EIR/EIS cannot be made without access to all volumes. The Draft EIR/EIS is available on CD ROM. However, many members of the public do not have CD ROM capability. Even some of the librarians are not trained in accessing information on CD ROM. In addition, the CD ROM does not contain volumes 16 and 17, so does not provide access to the entire Draft EIR/EIS. All 17 volumes of the Draft EIR/EIS are available in only four places: City of Santa Rosa Library; Guerneville Library; Sonoma State Library (held on reserve; only two volumes available at one time); Laguna Wastewater Treatment Plant (the only location convenient to West County; only open week days 9-11 and 1-4.). In describing how this limited access meets your requirement of public access, please specify the legal requirements you must meet, and explain how you have met them. 002
- Also, please provide a count of the number of responses you have received from West County residents and the number of responses you have received from West County rural residents. 003
- Also, please document that the introductory Volume 1 has been sent to all necessary persons. One of the landowners whose property would be condemned has not received

the document. There may well be others whose lands will be destroyed in one way or another who have not been notified. 003 (cont.)

2. The second way in which the Draft EIR/EIS does not meet its burden of providing access to information is that the Draft EIR/EIS is almost incomprehensible. In the Draft EIR/EIS are 5 Alternatives. However, each Alternative has sub-alternatives, which results in 12 alternatives. In order to determine the effects of any one sub-alternative the reader must jump from spot to spot as the Draft EIR/EIS discusses an effect or mitigations on all Alternatives before considering the next effect or mitigation. The length and organization of the Draft EIR/EIS make it almost impossible to comprehend. The Draft EIR/EIS must be comprehensible to the average person in a reasonable amount of time. The Draft EIR/EIS could have been made comprehensible had it followed each sub-alternative separately. Please document that the Draft EIR/EIS is comprehensible to the average person in a reasonable amount of time. 004

II. In regard to the West County Alternative, noise is a problem. The Draft EIR/EIS is inadequate in regard to its discussion of noise. It is essential to know just how destructive this noise is going to be, in determining the adverse effects of each sub-alternative. 005

1. According to the Draft EIR/EIS there has been no study of the ambient noise levels in the West County Alternative area. Most of the pump-stations in the West County Alternative are located in extremely quiet rural areas; areas where the quiet is important. Each receptor-site (each residence, business, etc.) must first be studied for ambient noise at several different times of day and night, seasons of the year, and weather conditions.

2. Each receptor-site must then be studied to determine how the sound of the pumps would carry to it. Because sound carries differently over flat land than over hills, the study must be topographic; because each receptor-site is unique in terms of topography, each receptor-site must be studied separately. These studies must also be done at several different times of day and night, seasons of the year, and weather conditions. In addition, these studies must be done for each of the different sub-alternatives, and for each possible combination of sub-alternatives, or combination of portions of sub-alternatives. In addition, the effect of the dam, or dams, in reflecting noise must be taken into account in determining the path and the effect of the noise pollution. The current "estimated" noise level table is totally inadequate in that it reflects neither the factors indicated above, nor the ambient noise levels. In addition, Table 4.13-19 indicates fewer pumps than are proposed for the West County Alternative else where in the Draft EIR/EIS. 006 007 008 009 010

3. In addition, studies must be done or referenced to determine the long term constant effect of this type of noise pollution over time on persons, animals, plants, and wildlife, and the effects of such noise pollution on other land uses, either current or possible in the future. 011

III. In the West County Alternative, the septic systems are expected to be destroyed and will have to be replaced by "unconventional " systems. The Draft EIR/EIS is not adequate in its examination of this consequence. The EIR/EIS must determine all septic systems which it can guarantee will be adequate under the West County Alternative.] It must further determine, for each affected house or business, the cost of putting in the new septic system, and address the question of whether the City of Santa Rosa will accept financial responsibility for the cost of the new septic systems, and, if not, whether it will pay condemnation cost if the land owner is unable to utilize his property because he cannot afford the cost of the "unconventional" septic system.

IV. In the West County Alternative, the Draft EIR/EIS acknowledges that housing will be lost. However, the Draft EIR/EIS is inadequate because it refers only to houses lost through actual condemnation of land for the dams and reservoirs. The Draft EIR/EIS must detail, and list, by address and parcel number, all housing which will be lost, not only to the dams and reservoirs, but also because the noise, odor, cost of "unconventional" septic system, or well contamination makes property uninhabitable.

V. In the West County Alternative wells will be contaminated by the reservoirs. The Draft EIR/EIS maintains that this will be a very slow process; however not all studies of ground water seepage agree that the process will be slow. The EIR/EIS must demonstrate that its assumption is correct.]

Also, wells may be contaminated by a wide range of substances. Testing must be done on the wells for all possible contaminants. There has been no indication of how often the wells will be tested to determine when the contamination occurs;] nor has there been any indication of who will pay for this repeated wide-range testing. Will residents of West County who lose their wells then be offered unlimited free water in perpetuity from the City of Santa Rosa?

VI. It apparently is under consideration to use not one sub-alternative, but rather parts from several sub-alternatives. What this does is create several hundred possible alternatives consisting of different parts of different sub-alternatives that have been studied in the Draft EIR/EIS. The problem is that none of these hundreds of new alternatives have been studied. Parts of them have been studied, but now each of these possible combinations must be studied as a complete alternative. The detrimental effects of two sub-alternatives, could multiply, rather than add, if the sub-alternatives, or parts of them, were combined. It is necessary to determine the cumulative effects. Studying parts of a plan separately will not necessarily demonstrate the damage that will occur when the parts are combined. Each possible plan must be studied in its entirety to determine all of the effects that can occur.]

VII. The implementation of most of the alternatives discussed in the Draft EIR/EIS would encourage increased growth and development. There was no discussion in the Draft EIR/EIS of the impact this encouragement to growth and development would have. Since this would be an important effect, it also must be studied. In addition, the cumulative inputs of all of the alternatives have not been analyzed although, if this EIR were approved, all could be implemented. This would result in massive amounts of potential future development and traffic, noise, and assorted problems, none of which have been analyzed.] 019

VIII. The West County Alternative appears to place a pump station on the property at 6000 Bloomfield Road. A telephone call to Community Development Senior Planner the Friday before the last public hearing resulted in the information that she was on vacation; a voice mail question to her supervisor resulted in a message, 10 days later, from Pat Collins, that they do not think anything is proposed for that property. In that case, what is the location for pump WBP8-10? And if they can't tell where a pump is, how can the public? Neither the public nor the "experts" can understand the Draft EIR/EIS.] In fact, pump and pipe line locations are uncertain. For example, for the Bloomfield Reservoir Sub-Alternative, there are three different alternative transmission routes to the reservoir. This is true of other Sub-Alternatives. As a result, the Draft EIR/EIS cannot make statements about effects, because there are too many possible alternatives, and many of the details are uncertain.] In addition, one of the possible plans is to combine parts of different Sub-Alternatives. This results in hundreds of different alternatives. No EIR/EIS can effectively study that many alternatives. The City of Santa Rosa must explain why it has not abandoned some of the less desirable alternatives and concentrated on producing a comprehensive and responsive EIR/EIS on limited and feasible alternatives.] 020 021 022

IX. The West County Alternative is based on misconceptions. 023

1. It assumes that West County wants and can use Santa Rosa's waste water. Despite repeated demands, Santa Rosa has been unable to produce any significant acreage that is willing to accept Santa Rosa's wastewater. If Santa Rosa is to continue to maintain that there are willing irrigators in West County, it must back up this claim with proof in terms of verifiable acreage, or admit that it has no willing irrigation users.]

2. In addition to proving that there are willing West County irrigators, Santa Rosa must prove that West County land is capable of accepting the volume of water that will result from an implementation of the West County Alternative. Many properties have year round springs; adding more water will only result in more run-off. Those persons who have been involved in agriculture in West County for years, or, in some cases generations, maintain that water in the volume required by the West County Alternative will destroy the land. Destroying Sonoma County Agricultural land to deal 024

with Santa Rosa City's sewage is not acceptable.

024 (cont.)

X. Some West County farmers will have their livelihood destroyed if the Santa Rosa wastewater contaminates their land. Farmers growing organic produce will find it difficult or impossible to market produce grown with wastewater. It is also impossible to grow herbs for medicinal purposes with wastewater because the products of these herbs are then concentrated. How does the City of Santa Rosa plan to prevent contamination of these lands?

025

XI. If lands are contaminated with wastewater, and therefore cannot be continued in the use the landowners choice, or if lands become unuseable for agriculture as a result of excessive water drainage on the land, will the City of Santa Rosa reimburse the land owners for the taking of their lands?

026

XII. The Draft EIR/EIS acknowledges that wastewater sludge will cause odor problems. The Draft EIR/EIS must also study the effect of continued exposure to these odors on the use and value of land. Will some of the towns or residences become virtually uninhabitable? What effect will this have on the tourist trade in such towns as Valley Ford? Is the City of Santa Rosa prepared to compensate the landowners and business owners for thier losses?

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028

XIII. If lighting is to be used for the dams or pump stations the Draft EIR/EIS must study the adverse effects of lighting upon the wildlife, both plant and animal. Many of the areas in West County have considerable wildlife and the effect of lighting on them can be extremely destructive.

029

XIV. The lead agency should be the County of Sonoma. It is inappropriate for a project within the bounds of Sonoma County, but not within the bounds of the City of Santa Rosa, to be decided by the City of Santa Rosa.

030

XV. The Sub-Alternative which can be called the Bloomfield Project stands as a project on its own, yet does not have an initial study of its own. This is a violation of CEQA. The same is true of all the Sun-Alternatives, and of any combination of Sub-Alternatives.

031

For the reasons stated above, the Draft EIR/EIS is inconsistent, incomplete, and inadequate.

Sincerely

Karen Kibler



Linda Johnson



