



MARIN CONSERVATION LEAGUE

55 Mitchell Boulevard, Suite 21 • San Rafael, CA 94903
(415) 472-6170 • Fax (415) 472-1404

October 4, 1996

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

OCT 07 1996

**DEPARTMENT OF
COMMUNITY DEVELOPMENT**

Board of Directors
Marie Meredith
Priscilla Bull
President
Jane Mills
Vice President
Jean Berensmeyer
Vice President
Grant Davis
Secretary
Lawrence Smith
Treasurer

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

Dear Ms. Meredith:

Marin Conservation League is very concerned that the Santa Rosa City Council and Board of Public Utilities make appropriate choices for the future of the City's wastewater system. The comments below address general inadequacies of the draft EIR/EIS and deal with specific inadequacies, omissions or questions raised by the present draft.

001

Volume I, Chapter 1.6 -- Description of Existing System and Alternatives

The maps provided in this section are inadequate to accurately present and clearly identify either the project location or the alternatives and subalternatives discussed.

Volume IV, Appendix D-19 -- Irrigation Management Guidelines for the West County and South County Alternatives

002

The direct effects of irrigation of slope areas with wastewater and the cumulative impacts arising from erosion/sedimentation effects of the proposed actions added to the agricultural abuses of the 1880's to 1920's are not addressed in the draft EIR/EIS. See "Anticipated Severe Erosional/Sedimentation Impacts of the Proposed Reservoirs and Associated Irrigation" 9/29/96 Eugene Kojan, Ph.D., Engineering Geologist.

Pesticide application and dispersion into the environment is significant and not adequately addressed in the draft EIR/EIS. The proposed change from the current land use of dry-land pasture to irrigated pasture or "high-tech agriculture" carries with it very different scenarios for the use of agricultural pesticides. One of the characteristics of "high-tech agriculture" is strong dependence on the use of agricultural pesticides. The monitoring proposed for pesticides is woefully inadequate -- of the order of visual inspection. Direct analytical monitoring is imperative to determine whether objectives are being met. This is potentially a very serious problem for the Esteros, as well as the aquatic resources of the Estero watersheds. The only sure way to avoid losing pesticides into the environment is by not applying them in the first place.

003

Volume VI, Appendix E-7 -- Evaluation of Soil Erosion Impacts for the West and South County Reclamation Alternatives

004

The draft EIR/EIS is seriously defective in assessing the presently active and project-related erosion processes and rates. It only addresses sheet erosion, a relatively minor process on properly-managed, grass-covered grazing land. The Universal Soil Loss Equation is highly subjective in application to other than tilled agricultural land. The EIR/EIS and the USLE methodology totally ignore the important role in this landscape of soil creep, rilling, gullying, debris flows and a wide variety in type and size of mass wasting processes. Although the draft EIR/EIS occasionally and sporadically cite "landslides" and "erosion gullies," its treatment is inadequate in recognition, scale, resolution and accuracy. See "Anticipated Severe Erosional/Sedimentation Impacts of the Proposed Reservoirs and Associated Irrigation" 9/29/96 Eugene Kojan, Ph.D., Engineering Geologist.

A nonprofit corporation founded in 1934 to preserve, protect, and enhance the natural assets of Marin County for all people

Volume VI, Appendix F-1 -- Geotechnical Assessment of Alternative Reservoir Sites and Pipeline Routes Volume I 005

The draft EIR/EIS fails to address the direct effects of filling and drawdown of the proposed - reservoirs on the wide variety of erosion processes present in the watershed. [It also fails to address both the reduction in the static slope stability and dynamic slope stability.] 006

Factors and impacts related to increased ground water levels, major increases in mass erosion and sedimentation, seepage paths leading to slope destabilization and subsurface erosion are not discussed and analyzed in the draft EIR/EIS. See "Anticipated Severe Erosional/Sedimentation Impacts of the Proposed Reservoirs and Associated Irrigation" 9/29/96 Eugene Kojan, Ph.D., Engineering Geologist. 007

Volume VIII, Appendix I-9 -- Treatment Wetlands Evaluation 008

It is known that wetlands operate as a natural filtering system for heavy metals which are trapped in them. Inadequate evidence has been presented that the amounts of these materials which might be deposited do not pose a problem to higher organisms through bioaccumulation. 009

Assuming population growth, extrapolate from current data to predict future concentrations of toxins in clams at the time of maximum population or build-out. 010

For created wetlands, maps should be provided that describe the proposed area. If a wetland already exists, the area should be shown before and after the proposed project. If a wetland exists, wetland design should specify the total number of acres to be created versus the number of acres existing. [An inventory of special status wildlife should be discussed as well. Will there be a wildlife corridor so that these areas are accessible to wildlife? If these areas present a future problem for wildlife, will there be any way to prevent them from using the area?] 011

General Comment: 012

Water is a valuable resource. Creating a new water demand by setting up irrigation-dependent agriculture is probably not a good idea in the long run. Investment in an extensive irrigation system is a long-term investment and once committed, it will be difficult to reallocate the resource even after the planned life of the project and even if water demand has increased to the point that using it for irrigation, especially of irrigated pasture, is wasting a resource.

One of the ways in which the City of Santa Rosa might reduce the needed system capacity is to amend the general plan to further restrict growth. Whatever system is constructed now may affect the availability of choices and the costs of those alternatives into the future. The draft EIR/EIS should analyze these effects on future options. 013

Thank you for the opportunity to comment on this document. We look forward to participating in this important process on a continuing basis.

Sincerely,


Pegi Knopp
Chair, Water Committee