

144 5162-3906

Russian River Task Force, PO Box 66, Healdsburg, CA 95448

OCTOBER 6, 1996

To: Santa Rosa Sanitary District
 From: Martin Griffin, MD, M.P.H., Russian River Task Force

Re: Inadequacies of wastewater EIR

- I have spoken about this EIR at the public hearing. Please include that testimony and this as part of the record. 001
1. Lacking an overall comprehensive management plan, the Russian River is being destroyed piecemeal by single purpose plans, such as a) Santa Rosa's wastewater disposal; b) an inflated 40 percent increase in drinking water diversions by the SCWA; c) Channelizing tributaries for polluted stormwater runoff by the SCWA; d) strip-mining and dredging gravel, speeding flood flows and destroying the protective gravel aquifer that filters the drinking water for Santa Rosa and 10 other water contractors, serving 500,000 consumers. 002
2. Please address why this simplistic plan which favors dumping wastewater in the Russian River during the winter months won't: a) worsen flood damages for downriver cities; b) flood, overtop and contaminate the drinking water infiltration ponds for the Mirabel and Wohler collectors of the SCWA, and for new collectors and infiltration ponds proposed for the Kaiser and Wayne ranches upriver from Santa Rosa's wastewater outfall pipeline, or from Mark West Creek. 003
3. Please address why Santa Rosa's wastewater dumping into the Russian River won't add to what the State OES calls the *greatest repetitive flood damages of any river west of the Mississippi, and the costliest flood damages*—\$100 million in the floods of 1995 alone. 004
4. Please address cumulative impacts of the following on the flood damages resulting from narrow canyons backing up contaminated, mud laden water all the way from the flood-victim-cities of Monte Rio to Healdsburg. 005
- A) Excess instream mining of gravel that has sunk the riverbed up to 20 feet, removed oxbows and forests, speeding flood flows.
 - B) The dredging of nearly 1,000 acres of deep pits in the Middle Reach aquifer, which are eroding, rupturing and threatening pit capture. These block river recharge of critical aquifer.
 - C) The effect of channelizing nearly every tributary serving nearly 100,000 paved acres from Windsor to Cotati, speeding floodwaters and polluted stormwater runoff toward the downriver cities.
 - D) the effect of dumping wastewater up to 20 percent of the river flow on downriver cities flood damages.
5. The EIR description of gravel mining is totally inadequate, does not address the downcutting of the riverbed, the grossly excessive instream extraction of gravel, or the cumulative impacts of abundant pits. 006
6. The EIR does not address the SCWA new EIR and need for new sites for water collectors and infiltration ponds opposite where Santa Rosa proposes a 54.4 inch pipeline outfall into the Russian River. 007
7. The EIR does not address the potential cumulative impacts of wastewater, stormwater, watershed erosion, and substrate compaction on the quality of drinking water for a half-million people. 008
- In conclusion, it is our opinion that what the Santa Rosa Sanitary District, the SCWA and the RWQCB are doing will eventually make downriver flood damages worse and could cost these upriver rate payers billions in class action lawsuits. 009
- We urge you to keep all wastewater and stormwater out of the river and to drastically curtail growth along the 101 commuter corridor, which will add to wastewater, stormwater or river gravel use.

ATTACH:

Martin Griffin M.D., M.P.H.
 Co-CHAIR
 707-431-7107

UNIVERSITY OF CALIFORNIA, SANTA CRUZ

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ENVIRONMENTAL STUDIES

SANTA CRUZ, CALIFORNIA 95064

March 31, 1994

Westside Road Wineries Russian River Task Force
P.O. Box 66
Healdsburg, Calif 95448

*Submitted by
Russian River
Task Force
for Waste Water
EIR*

RUSSIAN RIVER MIDDLE-REACH
AGGREGATE OR AQUIFER?

Robert R. Curry
Professor - Hydrology
Univ. Calif. Santa Cruz

with assistance from
John Leys

BASIC FACTS:

- Aggregate Mining: 51 million tons in last decade; 80% used in Sonoma County. 47% (2.4 million tons) from terraces; 34% from quarries; 8% from the stream (no permits since 1980).
- CDMG "Designation" as aggregate source, established by gravel industry. Basically granted upon application and demonstration of resource. Not intended to be mutually exclusive, nor to require counties to designate as a mining resource use area.
- Syar has 'vested rights' to 870,000 tons per year from Middle Reach stream bed through gravel skimming. Total value of 'vested right' gravels in Middle Reach @ \$6.50/ton for 48 million tons is \$312 million, therefore the gravel industry is a very important component of the geopolitical picture in Sonoma County.
- Claims that forgoing the opportunity to mine these resources will have major economic consequences to all are not well founded. If all aggregate were imported from out-of-county, its cost may be as much as \$3.50 more per ton. There are about 65 tons of aggregate in a new house, so that translates to a \$225 total cost increase, or about 0.2% of the construction costs of \$100,000 for a new home. The real expenses are to those few who control the gravel resource lands.
- The Russian River bed has dropped up to 22 ft since the 1950's. This has isolated it from its former floodplain, entrained much more fine sediment in the river (from oversteepened banks, from trapped floodwaters, and from the river-bed itself unprotected by coarse gravel), drained the groundwater, and threatens the municipal water supply pumps. The same thing happened in

Ukiah, where long instream-gravel mining and stream capture by adjacent deep pits, together with a dam on a tributary stream (Coyote Dam on the East Fork) caused fine sediments to plug the Rainey collector water system and reduced both the flow-path length and the pump capacity. The Ukiah City water department was thus recently required to put in a costly water treatment plant and forgo passing its water through the river bed sediments to effect capture of microbial contaminants, metal compounds, and potential spills or releases of toxic substances into the Russian River. Now they just pump from the river and treat the water, just like most midwesterners who are not gifted with a clean aquifer to process stream water arising in sites of grazing and farmlands.

- SCWA has been fortunate so far in that they can use the separation between the river and the pump intakes to "treat" riverwater. To be effective, the water must pass through sands and gravels where it will spend several days in sites of low oxygen availability and high microbial activity. If the pumps pull the water too directly from the river, it will not change its character from that of river water, and may be assumed to also carry the risk of any contaminants that may affect the river, such as highway tanker spills or sewage treatment plant failures. Ukiah pleaded long with the Public Health, but they were finally obligated to give up their Rainey collector system and put in a full treatment system because the collector capacity was decreasing and could not be backwashed without opening conduits to the stream bed. The situation at the Wholer wells is virtually identical to that at Ukiah 10 years earlier. It is probably possible to more flexibly pump from the much larger capacity and wider-distributed SCWA well field systems to minimize opening direct contact with the stream bed, but I doubt if the public will be informed when tests indicate that such connections exist.

- Employment in the aggregate mining industry is intensive, using as many as 100 people to mine and process a 50-acre site in 3-5 years. Agricultural uses of the same land base would be likely to use only 10 people in growing and processing, but that labor base is in perpetuity - not boom-bust.

- Warm Springs Dam (Lake Sonoma) prevents winter flushing flows that would clean gravels of accumulated fine sediments very frequently, but it then releases about 50,000 ac-ft annually. This is about the SCWA demand. Total releases to the Russian River system, from Lakes Mendocino and Sonoma, and directly from the Eel river, total about 200,000 ac-ft/year. The much increased summer flows are capable of moving finer sediments and eroding during the summer, which is not the historic character of the Russian River. This has severe impact on lower river spawning gravels that are covered with silt below the summer flow level.

- There is unmistakable evidence that pits become blocked with finer sediments that wash in from the banks, from stockpiled soils, and from side streams or deliberate filling. While the monitoring of wells in the vicinity of the Grace Pit indicates only a minor impediment to flow of water toward the river from the terrace, the gradient on the groundwater between the pit and the river is much steeper than where such a pit does not exist. This effect was demonstrated dramatically in 1992 when the Benoist Pit, fed primarily by rain that fell directly into it, overflowed its dikes and caused their failure with the catastrophic draining of over 10 feet of the pond volume. The restricted infiltration of water from the pond into the surrounding groundwater caused it to rise faster than the groundwater during an intense prolonged rain period. Since the pond could not drain into the river, it overflowed and the perimeter berm

eroded into the river.

MIDDLE REACH AQUIFER:

The Middle Reach aquifer today provides water for about 350,000 residents without costly water treatment. Existing pumps can pump 92 million gpd or 282 ac-ft/day, but about one-half of that amount is the present average demand. 150,000 more users are projected for just Sonoma County by 2010. The new Marin County water contract will supply an additional 60,000 people to total 35% of the MMWD users.

The total volume of water in the Middle Reach aquifer is on the order of 173,000 ac-ft [9 mi x 1.5 mi x 50' deep @ 2/5ths water-to- gravel ratio (40%)]. That water has accumulated as the Middle Reach basin sinks geologically as it has for on the order of 10 million years (like Ukiah and Round Valley/Covelo). It is clean and microbiologically mediated and cleansed (anaerobic bacteria, etc.). That volume of water would supply the SC WA for 3.5 years even with zero flow in the Russian River and its reservoirs. Since gravel mining began, the bed of the river has dropped, in some places as much as 22 ft. Groundwater levels then also dropped, since the river controls the basin water level. With a 10 ft ultimate drop over the 8640-ac basin, we have lost 35,000 ac-ft of water, or the water for 225,000 Sonoma County water users each year. This is a "permanent" loss of 17% of the aquifer, just caused by incision of this gravel-starved river and its tributaries.

For comparison, Warm Springs Dam impounds 381,000 ac-ft in Lake Sonoma for a taxpayer cost of \$316/ac-ft capacity. Forty-five percent of that capacity was available for free, with free water treatment, at a cost of \$0 to taxpayers.

Prior to gravel mining and incision, the river would recharge the top 10 or more feet of its aquifer at least 2 out of 5 years just from overbank flooding into the prune orchards. Now the water table is much lower, and the gravel-based flood-plain soils are well drained and support premium grapes as the prime agricultural crop. Prior to mining and diversion of water from the Eel River, the Russian River below the Middle Reach would in most years be fed by the Middle Reach aquifer through the long hot dry summer, so flow was maintained below this site, even when the stream bed was completely dry above the Middle Reach.

AGRICULTURE:

About 600 acres of agricultural lands have been mined in the Middle Reach, or are proposed to be mined. Agricultural uses of lands are compatible with subsurface aquifer uses, although we have today lost the benefit of frequent flooding and trapping of silts in the farm lands. Instead, the silts and their nutrients stay in the river and pass downstream, to damage the fishery resources and waste potential soil nutrients. Thus, today's prime and high class agricultural soils in the Middle Reach are anomalous - no longer forming through flood inundation. Sonoma County must learn the hard lesson that the Egyptians are learning today after the High Aswan Dam construction.

SOILS:

The soil stockpile requirements of the earlier County ARM plan and of the State of California, Division of Mines and Geology, are archaic and often counterproductive. You cannot pile soil in a pile and mine for a few years and then respread it over the banks of the pits and expect it to work any better than you can bulldoze your farm buildings into a pile and expect to be able to use them again later after bulldozing them back to their approximate original positions. The structure, function, and life of the delicately balanced soil system is as complex as any farm. Soil must be handled rapidly, carefully, and if at all possible, continuously - just as you would any organ transplant. The new 1994 ARM plan calls for miners to propose a scheme to preserve soil fertility and function, but offers no suggestions and still anticipates stockpiling of bulldozed soil layers.

FISH:

Salmonids spawn in gravels in the Middle Reach tributaries. Past skimming operations removed the surface sorted and winnowed larger gravels that were necessary to protect the spawning redds of eggs laid in underlying finer gravels. Today, only the Dry Creek tributary has much of the needed top gravel sizes. As Dry Creek incises due to the dropping Russian River and due to the Warm Spring Dam that starves it for new gravel, it tries to make up for its excess transport capacity by eroding its banks and other prime agricultural lands to supply a dwindling level of new gravel to the main river. The starved main river, with its considerably added summer flows, now has largely unprotected finer gravel bars and sand beds that can be attacked and moved through much of the summer. Operating any vehicle, let alone mining, on the gravel bars in the summer opens the protective gravel layer to erosion the ensuing fall when the river rises. This is when salmon once moved into spawning beds, but today encounter mostly sand or gravels too fine to protect their eggs from expected winter flows. These fish search onward, running the gauntlet of very frustrated and despondent fishermen at the mouth of Dry Creek where a single bar of good gravel, recruited from upstream bank-cutting, remains. Both the local fisherpersons and the ospreys know this is the last possible site, right at the temporary seasonal Dry Creek river crossing. The very rare fish who may make it that far, may try to move upstream farther to find something less crowded, only to encounter difficult passage at the rip-rap dam at Healdsburg, and exposure, exhaustion, and another battery of local frustrated fishermen.

ECONOMIC COMPARISONS:

The value of the renewable water resource foregone to date is 35,000 ac-ft @ \$260/ac-ft = \$9 million. The agricultural value foregone is about \$6000/acre with a minimum 2-times local multiplier for jobs and sales to support the vineyards and wineries = \$18,000 per acre X 600 acres mined = \$10.8 million per annum.

One acre of aggregate nearest the river where it can be mined to the maximum 50-foot depth would yield \$812,500 for 125,000 tons. From that gross value one must subtract the estimated \$34,000/acre reclamation costs (to open water), the 50-cents/ton 'mitigation' fee imposed by the County (\$62,500 to yield a net (gross) of \$716,000/ac.

Using the simplistic economics of the 1994 dEIR, and not counting losses of fisheries, recreation, multipliers, environmental losses, losses of water quality and quantity, and human land-value and esthetic impacts, one could simplistically project that the crossover point would be about 33 years, after which the net continuous income generated by agriculture in perpetuity exceeds the total value withdrawn in gravel for a one-time short-term gain.

But, if agriculture is chosen over aggregate mining so that future generations will not be saddled with opportunity costs foregone today for today's profit, then the aggregate itself must be made up somewhere. Over a 20 year period, this would add \$168 million to costs for the construction industry, minus \$10 million in foregone reclamation costs and minus the County mitigation severance tax of 50 cents/ton, for a net cost increase over 20 years of \$134 million. Comparing agricultural income with the increased costs of importing gravel, we find a 29-year period, after which the County loses money by NOT importing gravel.

If we factor water into this equation, allowing Sonoma County to export water at a modest profit of \$200/ac-ft for a mere 15,000 ac-ft/year sustainably from the Middle Reach aquifer, which could easily be done with very good Bay Area demand, this would more than offset the construction cost increases in a 20-year period. Thus Sonoma County could purchase gravel from the water-poor Livermore Valley, for example, and sell it at \$3.50/ton locally by just using a small portion of the water resource gained by not mining. If the aquifer were carefully preserved and recharge was maximized to permit 30,000 ac-ft to be exported annually, Sonoma County could emulate Japan and import gravel by barge from Alaska at \$12-15/ton with no added cost to Sonoma County aggregate users!

Russian River on 'threatened' list once again

by Barry W. Dugan
Sonoma West Editor

The Russian River made the list of the 20 most "threatened" rivers in the country for the second year in a row, according to a national conservation organization that ranks the nation's most troubled rivers.

Such a dubious distinction, however, should draw needed attention the river's plight, according to local river watchdogs.

"This is just a stronger wake-up call," said Joan Vilms, president of the Friends of the Russian River. "The whole point (of the list) is to raise people's consciousness. It certainly is a dubious distinction. But it keeps the pressure on and that's what we have to do to make some changes."

The list of the 10 "endangered" and 20 "threatened" riv-

ers in North America is published annually by American Rivers, a national river conservation group.

The 110-mile long Russian River "is an index of threats that rivers face today," states the report from American Rivers. "Flowing through redwood forests, vineyards, and urban centers, each mile introduces a new threat — siltation, erosion, pesticide and dairy waste run-off, dams, diversions, gravel mining degradation, destruction of habitat through logging, wastewater discharge and urban development."

Not everyone, however, agrees that the river is in such dire straits. In an announcement concurrent with the American Rivers report, the Friends of the River cited information released by public agencies. The state Regional Water Quality Control (Please see River page A8)

River...

(continued from front page)

ward is credited with saying at "over the past ten years water quality in the Laguna de Santa Rosa has actually gotten worse."

But Bob Tancreto, a staff member with RWQCB, disagreed. "To say it has gotten worse is absolutely not true," said Tancreto. He said that 20 years ago water quality was recognized as a problem in the Laguna and dairy farms were the source. "But they've done quite a bit of improvement ... we took specific actions regarding dairies and we got things turned around. In the last five years there has been significant improvement."

On the river overall, Tancreto said wastewater discharge standards have improved. Of greater concern, he said, is sedimentation in the river, caused by hillside vineyards and development. Much of that occurs in tributary streams, said Tancreto, which could have a greater impact on fisheries habitat than gravel mining in the main channel of the river.

Martin Griffin, a Healdsburg winery owner and river activist, said the listing underscores the

fact that the Russian River needs protection. Griffin has been leading the charge to shut down gravel mining in and along the river for decades.

"It's an indication that the (county) supervisors, who control the water agency and control the gravel mining, have just let the river go down the tubes," he said. "They haven't done anything that really protects the river. They are the main culprits."

Supervisor Ernie Carpenter, who has been a vocal critic of gravel mining in and along the Russian River, agrees that supervisors could do more. "Absolutely, the Board of Supervisors and the water agency could do more to protect the river," he said. "The Russian River is not in bad shape ... but the positive steps that need to be taken to restore it to what it once was, have not been taken."

Carpenter said he was "glad to see an emphasis on the river in the 5th District campaign ... it's going to take a concentrated public effort" to restore the river habitat.

Dennis Ripple, who runs operations along the river for Kaiser Sand & Gravel, is among those who don't think the river is in such terrible shape.

"If I was just Joe Blow, and

driving down to the river, I wouldn't think it was threatened," he said. "I just don't see the threat. We swim in it. We fish it. There are more pressures on the river today than when I was a kid ... but I just don't see the threat that they'd like to make people believe is there."

But river critics point to other statistical data to support their claims that the river is indeed threatened. The Russian River steelhead and coho salmon have been nominated for "threatened species" candidacy by the National Marine Fisheries Service; state highway officials are paying \$16 million to replace the Highway bridge over the river at Healdsburg, which was damaged in part by the effects of gravel mining; and county planners recently stated that over the past five years gravel mined from the river channel in the Alexander Valley has been taken out at five times the natural replenishment rate.

"The river anadromous fishery is dying, the river's banks and bed are being eaten away and flood danger is greater than ever," said Vilms, of the Friends of the Russian River. "Meanwhile, new gravel permits are granted, giant water diversions are being contemplated, and op-

portunities for massive wastewater releases are being weighed."

The state's Coastal Conservancy agency has been involved for the past several years in the Russian River Enhancement Program. Project director Laurel Marcus, believes that the river appearing on the "threatened" list will help "raise public awareness about the kinds of problems there are."

And, said Marcus, "there are lots of problems. If you just look at the fish numbers, it's a very good indicator of where the health of the river is going. That's the kind of bellwether that says maybe what you're looking at isn't as healthy as it seems."

The Russian River was once known throughout the world for its run of wild steelhead trout. Steelhead populations, for

example, have declined from 65,000 in the 1970s to an average of less than 10,000 between 1990-96.

But Marcus, who has been working on restoration plans and working with property owners along the river, is still hopeful. "It is going to be a long-term effort," she said. "But there are a lot of possibilities for the river being restored. That ... is always encouraging."

EMPIRE NEWS

Wednesday, July 31, 1996

Steelhead listing as imperiled proposed

By JODY KLEINBERG
Staff Writer

Steelhead trout, silvery fish valued for their beauty and feisty, acrobatic nature, may become the newest West Coast fish on the endangered species list.

Officials at the federal National Marine Fisheries Service on Tuesday proposed listing steelhead from Southern California north to the Canadian border and east into Idaho as either endangered or threatened.

The steelhead population — including fish in the Russian and Eel rivers — has been declining in recent years and federal officials, sports fisherman and environmental groups fear that unless restrictions are imposed, the legendary fish will disappear.

At least 23 West Coast steelhead populations are already extinct. In Southern California, only 500 steelhead remain in a region that once contained 25,000, according to fisheries studies.

"We must take firm and decisive action immediately if we are to save these precious runs," said William Stelle, the fisheries service director for the Northwest regional office.

But action is at least a year away because the proposal still must face public scrutiny and debate, and then be approved in final form. The final version will state whether steelhead are to be listed as threatened or endangered, said NMFS spokesman Brian Gorman.

In the current proposal, steelhead from Los Angeles County to the Russian River and in the Central Valley are listed as endangered and those in parts of Oregon, Washington and Idaho as either endangered or threatened.

"Endangered" means closer to extinction than "threatened" and gives the government more options in trying to preserve the species.

Although it has no immediate impact, the proposal is the first step toward tightening restrictions on fishermen and may serve as a warning to timber companies that streamside land use restrictions are coming.

Fast, strong and known for their flips and spins, steelhead have long been considered a premier sport fish. Although they live at sea, they return to fresh water to spawn.

In recent years, dams and development along rivers has had dire effects on steelhead populations. About 90 percent of the sea trout south of Canada have vanished, fisheries reports show.

Although lauded by federal officials, the proposed rule took years to formulate and came as the result of a lawsuit filed by numerous environmental and sport fishing groups. The groups — who had petitioned the federal government since 1992 — sued in order to force officials to make a decision on the status of the fish. The decision had to be made by July 31.

"I'm glad to hear they are so enthusiastic about it, given that the proposed rule is about a year and a half late," said Hank Bates, an attorney with the Sierra Club Legal Defense Fund, which represented 22 organizations in the lawsuit.

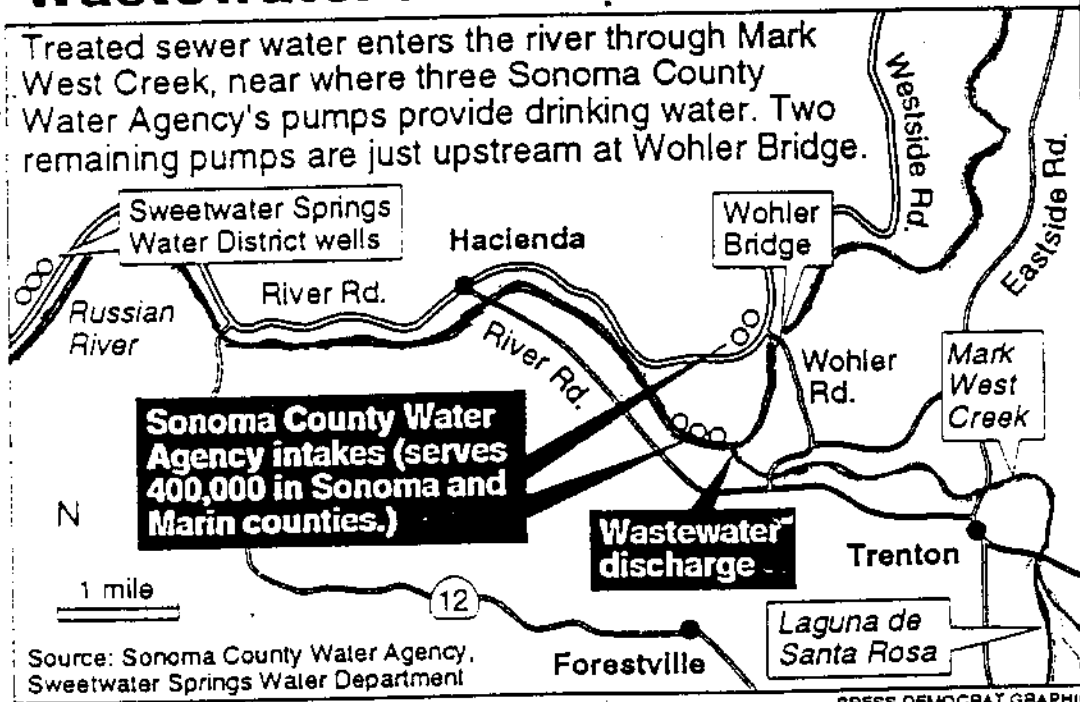
This story includes information from The Los Angeles Times.

*Submitted by
Russian River
Tackle Force*

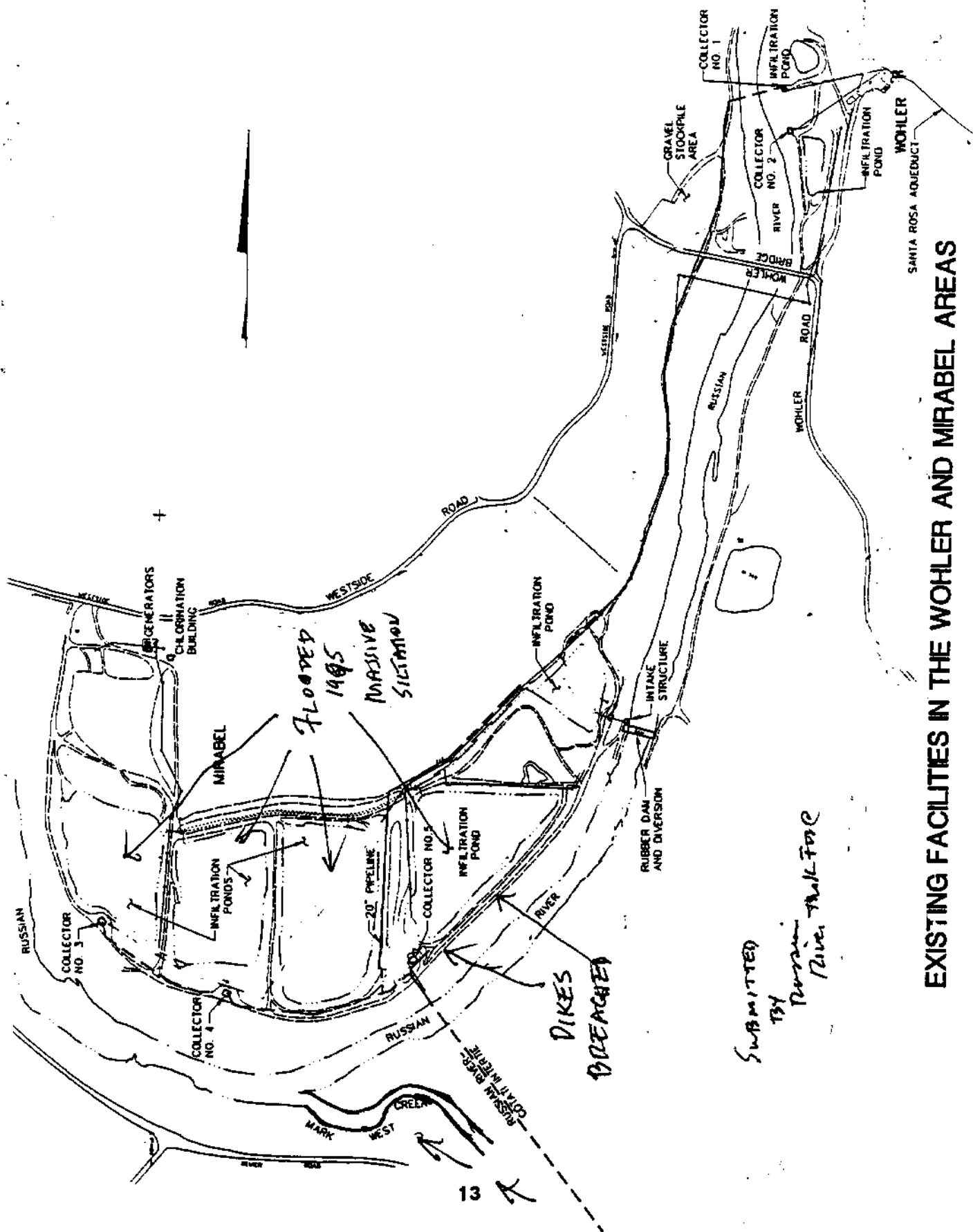
HOP KILN WINERY, INC

Wastewater in the Russian River

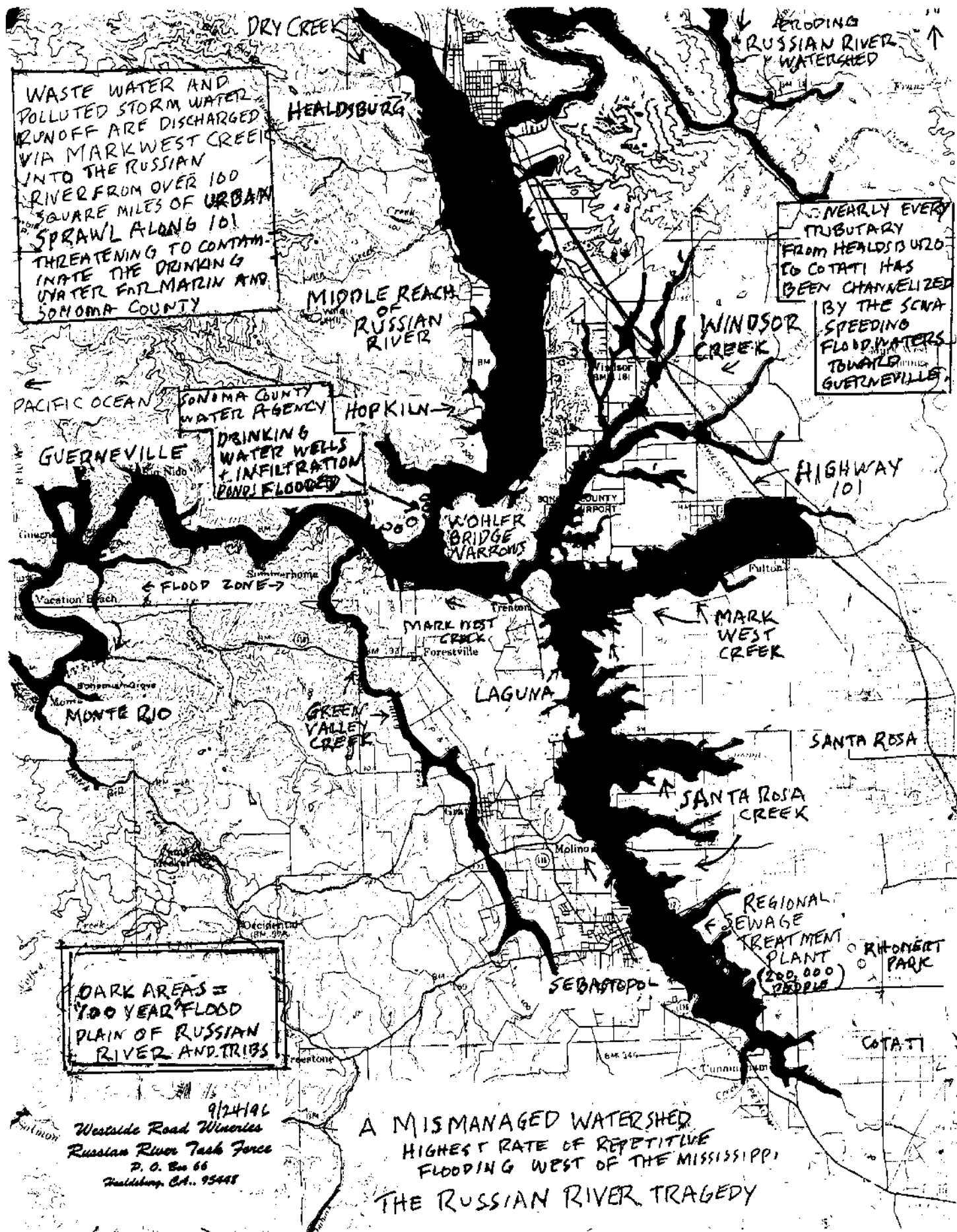
Treated sewer water enters the river through Mark West Creek, near where three Sonoma County Water Agency's pumps provide drinking water. Two remaining pumps are just upstream at Wohler Bridge.



*Sue Ann Abbey
Russian River
Task Force*



EXISTING FACILITIES IN THE WOHLER AND MIRABEL AREAS



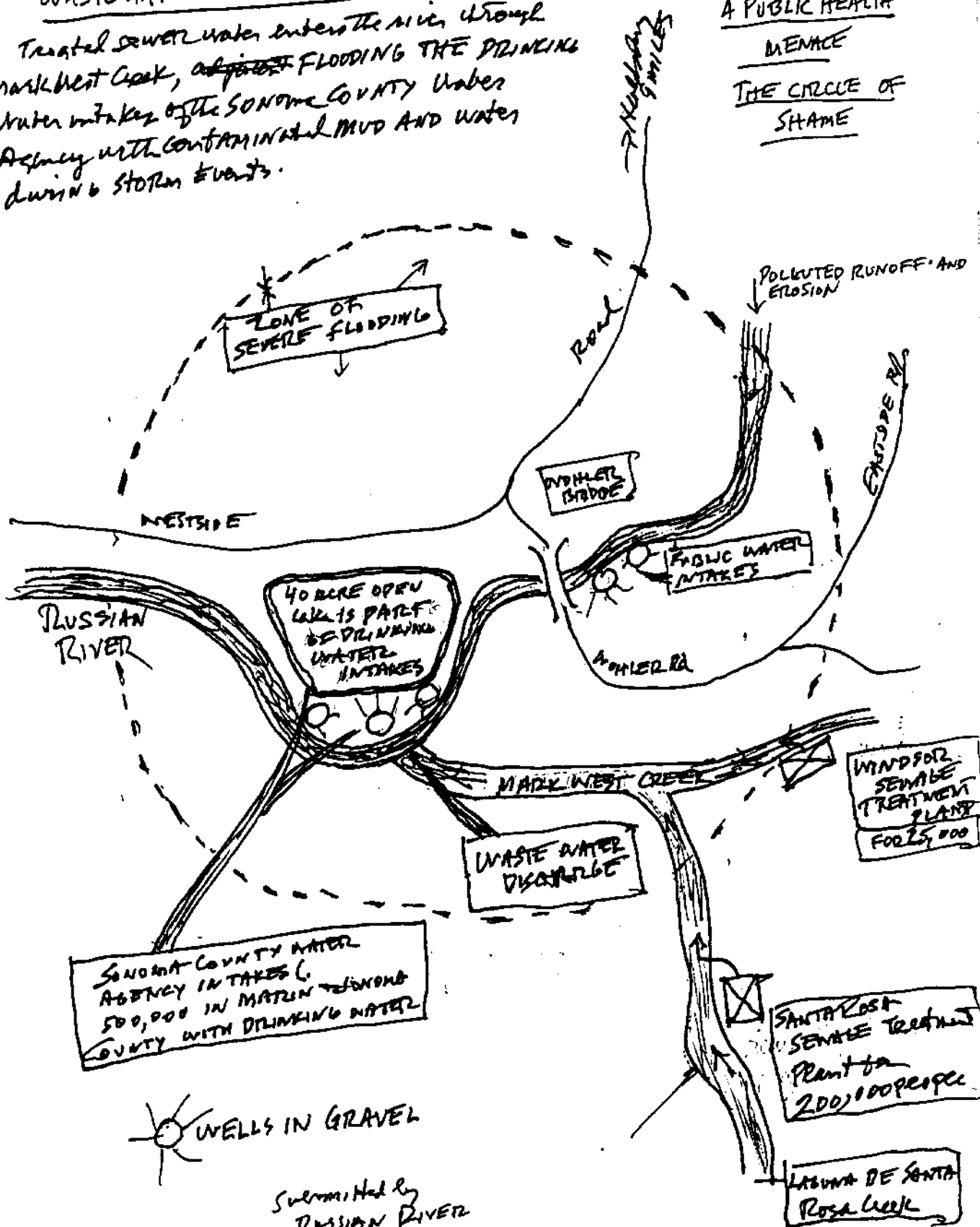
WASTE WATER IN THE RUSSIAN RIVER FLOOD

DRINKING WATER AREAS

Treated sewer water enters the river through Mark West Creek, ~~adjoining~~ FLOODING THE DRINKING WATER intakes of the SONOMA COUNTY Water Agency with contaminated mud and water during storm events.

A PUBLIC HEALTH
MENACE

THE CIRCLE OF
SHAME



NOT TO SCALE

Submitted by
RUSSIAN RIVER
TASK FORCE

*Sonoma, Healdsburg
Russian
River
Task
Force*

Gravel Mining Litigation Landmarks: Russian River

The following litigation or Grand Jury Investigations are the result of the failure of the Directors of the Sonoma County Water Agency (Supervisors) to have a master plan for the Russian River that manages all of its public resources on a sustainable basis. This is the most mining litigation since the Courts ruled against placer mining on tributaries of the Sacramento River over a century ago; but not before it half filled the San Francisco Bay with silt.

The litigation can be grouped into four parts.

I. Dry Creek Farmers; Sierra Club and Russian River Task Force (wineries, growers):

1976 — Successful litigation by 20 Dry Creek farmers vs. Sonoma County and 10 mining firms for allowing excessive mining, with dropping creek and river bed of 20 feet, loss of wells and property. All mining stopped and resulted in 1981 Aggregate Resources Management (ARM) Plan.

1989-1994 — Successful litigation by Sierra Club and Russian River Task Force vs. County and Syar Industries for rezoning an Agriculture and Aquifer Preservation area to mining without an EIR. Resulted in new ARM Plan.

1992 Litigation by Russian River Task Force and Sierra Club vs. Syar Industries and County for excessive dredging Phase I Pit without an amended Plan.

1993 — Successful litigation by Sierra Club and Russian River Task Force vs. Sonoma County and Syar for dredging gravel without a study of levee stability and pit capture. Injunctions to stop mining and EIR ordered by Superior Court in April 1994. Levees ruptured in floods of '95.

1994 — New single purpose ARM Plan approved by County. May trigger litigation for opening new river areas to strip-mining without an EIR, and to dredge another 200 acres of the aquifer, the regions only source of naturally pure drinking water.

II. Fishery Groups:

1985-1996 — Successful litigation by Trout Unlimited and United Anglers vs. Sonoma County, to require a fish ladder over Healdsburg dam, a checkpoint in the sinking river bed. Cost of Fishladder is \$1million — still not built in 1996.

III. Former Mining Employees or Aggregate Contractors:

1991 — Litigation by a former employee and a contractor against Syar and Kaiser for alleged price fixing and bid rigging in the sale of aggregate. Federal Grand Jury Investigation. Settled out of court 1995.

IV. Cities, State Attorney General, District Attorney, Grand Jury

