

CITY OF SANTA ROSA
P.O. Box 1678
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OCT 07 1996

DEPARTMENT OF
COMMUNITY DEVELOPMENT



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE**

Southwest Region
Habitat Conservation Division
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404

October 7, 1996 F/SWO22:RWB

Ms. Marie Meredith
City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, California 95404-3181

Dear Ms. Meredith:

Thank you for the opportunity to review and comment on the *Santa Rosa Subregional Long-term Wastewater Project Environmental Impact Report/Environmental Impact Statement (EIR/EIS)*. The presentation and magnitude of the EIR/EIS reflects a great deal of work. Because of the limited time for review, and the size of the document, my comments will be limited in scope to impacts and issues related to anadromous fishes. Responsibilities of the National Marine Fisheries Service (NMFS) include protecting and restoring marine, estuarine and anadromous fish resources. My comments on the EIR/EIS focus on topics and areas of the document associated with these resources. In fact, some of the comments may be fully evaluated and allayed in the report, but were too difficult to locate because of the size, complexity and organization of the EIR/EIS.] 001

The Santa Rosa wastewater EIR/EIS cannot easily be reviewed, and should not be considered consistent with the spirit of the National Environmental Policy Act. Even an extended review period would do little to resolve the difficulties encountered by reviewers of such a large and complex document.] 002

General Comments 003

The Santa Rosa wastewater project EIR/EIS is such a large document that it cannot be adequately reviewed during a 60-day review period. Sixty days is a common and acceptable review period for large documents of this nature, but the magnitude of this EIR/EIS should dictate a longer review period. The project planners need to understand that the agencies have limited resources with other responsibilities, and additional review time would provide a better opportunity for review, and result in more helpful and constructive comments.]

The wastewater treatment technology employed by Santa Rosa allows for the reclamation of a valuable resource. Allocating this resource is the important consideration, and a good strategy is to maintain flexibility by keeping as many options open as possible. By constructing the large infrastructure required to implement the south county reclamation and west county] 004



reclamation alternatives (Alternatives 2 and 3), Santa Rosa would be committing to one primary use, i.e., agriculture. Other beneficial uses, such as fisheries enhancement, aquaculture, wetlands creation, industrial, etc., would take a back seat to agriculture even though society and the city priorities may change. Prudent allocation of the reclaimed water could serve to relieve demand on natural water sources.

004 (cont.)

Related to irrigation, the EIR/EIS fails to address agricultural returnflows of water laden with pesticides, herbicides and fertilizers to natural waters of the county. If the nature of agriculture changes in the south or western part of the county because of the new and reliable source of water, and "high-tech" agriculture becomes established, use of agricultural chemicals in these areas will also increase. The EIR/EIS does not address this impact adequately. Non-point-source pollutants that find their way to rivers, streams, San Pablo Bay and the esteros are important impacts that should be addressed in the EIR/EIS.

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The EIR/EIS, while acknowledging the special status of coho salmon, does not consider the proposed listing of steelhead. Both southern Oregon/northern California coho salmon (*Oncorhynchus kisutch*) and west coast steelhead trout (*Oncorhynchus mykiss*) have been proposed for listing under the Endangered Species Act of 1973 as amended (ESA), and occur in Sonoma County watersheds. The listing of southern Oregon/northern California coho salmon is likely to give coho ESA protection, before the Santa Rosa wastewater EIR/EIS is in final form. The west coast steelhead listing can be expected in July 1997. These facts should be fully considered in the final EIR/EIS.

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The EIR/EIS would benefit by including detailed maps and schematic diagrams of the existing wastewater treatment system. It is difficult for readers unfamiliar with the existing wastewater treatment system to visualize the system components and how they relate to each other and the landscape.

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Specific Comments

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In the discussion of the West County and South County Reclamation Alternatives, specifically Alternatives 2C and 3B, the EIR/EIS recognizes that there is a conflict between these alternatives and the Sonoma County Aggregate Management Plan (ARM). The conflict is the availability of quarry gravel at these proposed reservoir sites; the ARM Plan provides for moving away from instream gravel mining in the Russian River, and increasing reliance on quarry mining. The Russian River has been significantly impacted by instream gravel mining, and the loss of alternate sources of gravel (quarries) would exacerbate these in-river impacts. The EIR/EIS should address the probable impact to the Russian River ecosystem that will result from prolonged in-river gravel extraction.

In the discussion of the south county reclamation and west county reclamation alternatives (Alternatives 2 and 3), the increased potential for land erosion and mass wasting is not adequately discussed. The reservoirs will increase potential for landslides around their shores, and by raising the water table, could also contribute to increased soil instability over broad areas. 009

Agricultural irrigation could contribute to increased erosion because of the lost capacity of the land to absorb winter rains. This further degrades aquatic habitat, due to erosion and increased siltation. This erosion issue is not adequately addressed. 010

Aquatic surveys conducted in the areas of proposed reservoirs were perfunctory at best, and do not take into account the special species status of steelhead trout. For example, anadromous fish surveys document the presence of steelhead at the Carroll Road reservoir site, but the authors discount their finding as insignificant. In the analysis of impacts to aquatic habitat at the Carroll Road Reservoir site (9.5.7), the conclusion is that this is not a major migration corridor because only one fish was found in the survey there. How many fish would be significant? This survey simply determined the presence of the species, but cannot assess the importance of its habitat because of its limited scope. The term "major corridor" as used in the Carroll Road reservoir survey is very subjective. Minor migration corridors are also important to species that have lost much of their natural habitat. "Major fish migration corridors" is not adequately defined; a concise definition should be included. 011 012

The conclusion, supposedly based on survey results, is that "all other reservoir sites will not be expected to act as barriers... because migratory species are not known to use any of those stream systems. There will be no impacts" (9.5.7). This conclusion is not supported by intensive fish surveys or investigations of historical use by steelhead. There will be no known impacts is a more reasonable conclusion. 013

Similarly, in the discussion of the Esteros Americanos fish surveys, three steelhead trout were sampled, yet the authors discounted this as an anomaly. These results indicate that steelhead have not been extirpated from this watershed, but the EIR/EIS concludes just the opposite. Many populations of anadromous fish are in serious decline and no longer occur in large numbers. Any single sighting must be considered significant, and their presence in a particular habitat is indicative of their use of that habitat. 014 015

In the analysis of Alternative 5B, discharge into Laguna de Santa Rosa, there is no investigation of the impacts due to increased levels of sodium salts and nitrogen. The Laguna de Santa Rosa is already impaired by excessively high levels of organic nitrogen, but the report offers little discussion on the predicted impacts of additional nitrogen input. The impacts to the laguna from 016

sodium salts should also be investigated.]

016 (cont.)

Adoption of any alternative that increases flow to the Russian River estuary could affect the frequency of artificial breaching the sand bar at the river mouth. More frequent breaching upsets ecosystem equilibrium and lowers overall habitat value. There may be other downstream affects resulting from changing river flows. The EIR/EIS should investigate and consider the potential downstream affects of all alternatives.]

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The proliferation of vineyards for wine grape production has increased demand for Russian River Water results from. A special analysis should investigate possible means of replacing or augmenting this demand by providing reclaimed water for vineyard irrigation and frost control.]

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Conclusion

The discharge Alternative (5A) would provide substantial flow augmentation potential to the Russian River. NMFS would support this alternative and would assist in the scoping of discharge management, i.e., seasons, volumes, etc. that would benefit fisheries resources. Municipal water diverters downstream would accept this alternative more readily with a sub-alternative that provides for a pipeline to deliver water from an upstream location. This is a feasible alternative that warrants further examination.]

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Insufficient consideration is provided to anadromous fish population status and habitat needs in this EIR/EIS. Coho salmon and steelhead trout issues are important and deserve a more thorough examination of their status in the watershed, and the potential impacts from each alternative. Chinook salmon is another salmonid due to receive Federal protection in the foreseeable future.]

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Still another alternative that should be investigated and possibly developed is discontinuing discharge into the Laguna de Santa Rosa all together. That is, allow the laguna to recover naturally, and discharge that portion of effluent directly into the Russian River.]


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Finally, NMFS supports the position of the Gulf of the Farallones National Marine Sanctuary that all of the "west county alternatives" will have detrimental effects on the marine sanctuary, and are therefore unsuitable.]

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If you have any questions concerning these comments please contact Mr. Dick Butler at: National Marine Fisheries Service, 777 Sonoma Avenue, Room 325, Santa Rosa, California 95404; telephone 707-575-6058.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Bybee". The signature is fluid and cursive, with the first name "James" being the most prominent.

James R. Bybee
Environmental Coordinator
Northern Area

cc: E. Uber - NOAA
M. Rugg - CDFG
J. Medlin - USFWS

