



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
 NATIONAL OCEAN SERVICE
 OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT

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

October 7, 1996

Ms. Marie Meredith
 City of Santa Rosa
 Community Development Department
 P.O. Box 1678
 Santa Rosa, CA 95402-1678

DEPARTMENT OF
 COMMUNITY DEVELOPMENT

Dear Ms. Meredith:

The Gulf of the Farallones National Marine Sanctuary has reviewed the Draft EIR/EIS Santa Rosa Subregional Long-Term Wastewater Project. The Sanctuary has been assisting Santa Rosa on this project for at least ten years and serves on the Technical Advisory Committee and is a cooperating federal agency to the Army Corps of Engineers, on this proposed project. This letter will give an overall review of the West County Alternatives (3A-3E). An addendum of specific questions, information needs or variances in interpretation dealing with the West County Alternatives is provided as part of this document. 001

This EIR/EIS is easier to understand and better organized than previous documents on this issue. However, the length of this three volume Draft document, the 16 volumes of pertinent support information, the purchase cost of the three volume Draft, the time period allotted for reviewing 19 volumes of complex information (67 days) and the myriad of charts, graphs and tables appears to remove the opportunity for an individual citizen to review the environmental issues as envisioned within the California Environmental Quality Act and the National Environmental Policy Act (CEQA/NEPA). Unfortunately the time frame also limited our agencies' ability to contract for outside expert review. These outside experts are so beneficial to the Sanctuary and Santa Rosa, it's a pity that additional review days could not be accommodated by Santa Rosa. 002

The Gulf of the Farallones National Marine Sanctuary was established in 1981 under the authority of The Marine Protection Research and Sanctuary Act. The Sanctuary is a unique (one of a kind) and special place selected by the people of California and placed as a candidate for sanctuary status before The Congress of The United States by the Governor of California. The Sanctuary was designated by Congress and approved by the President of the United States because of its unique contribution to the marine and estuarine environment of California and the United States of America. It is one of 13 National Marine Sanctuaries and the only one which manages estuarine environments. Any of the West County Alternatives would have detrimental effects on the resources of the Sanctuary; especially, within the most unique areas of the entire National Marine Sanctuary System. These areas are the Estero Americano and Estero de San Antonio. The West County Alternatives will probably also have adverse impacts on resources of the Sanctuary in Bodega Bay and Tomales Bay. Long and short-term effects on these resources are not discussed, nor the consequences of increased nutrients, heavy metals, fresh water flows and other constituents of wastewater on mariculture in Tomales Bay and at the mouth of the Estero Americano. The projects "fail safe" mechanism, to drain 50% of any dam within 7 days, would completely destroy the Estero habitat. 003

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separate category, to avoid any confusion. Increases in particulate matter, pesticide residues, heavy metals, fresh water flows, nutrients and decreased quality of runoff or percolated water would not be possible given the congressional mandate and regulatory structure of the Sanctuary. It is quite clear from the Draft EIR/EIS that all WEST COUNTY ALTERNATIVES WILL HAVE DETRIMENTAL EFFECTS ON THE RESOURCES OF THE GULF OF THE FARALLONES NATIONAL MARINE SANCTUARY. The EIR/EIS delineates 136 "significant" effects (Table 5.4-1) which have "no feasible mitigation" for Alternatives 3A-3E. These effects will occur in the short-term (construction phase), the long-term (operation phase) and emergency (inundation phase). The Sanctuary further believes that not all "significant" effects with "no feasible mitigation" have been investigated or delineated. For the above 136 reasons and those in the addendum all West County Alternatives are unsuitable for consideration as a viable project for the Subregional Long-term Wastewater Project and should be removed from the EIR/EIS.

Use of the Universal Soil Loss Equation is not suitable for non-tilled lands and it fails to address the role of soil creep, gulling, debris flows, rilling and mass wasting. The Sanctuary will need this information and how the project will effect the soil sediment component.

The total project, including monitoring with specific scientifically measurable criteria needs to be specified before future consideration can be given to this project. This monitoring plan, an enforcement plan, a penalty scheduled and contingency plan must be presented as part of the EIR/EIS for 60 days public review prior to a decision on the West County Alternative.

Thank you for the opportunity to comment on this Draft EIR/EIS, it is much improved and clearly indicates a great deal of work. The page by page review will make it clear why all Alternative 3 should be removed from consideration. Please call (415/ 561-6622) on me if I can be of assistance to you.

Sincerely yours,



Edward Ueber
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Gulf of the Farallones National Marine Sanctuary

cc: Jim Bybee
Wade Eakle
Debra Malek

P.3/6

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p. 4.6-3: Please define Inland for the Esteros are inland but they are part of the Gulf of the Farallones National Marine Sanctuary and under the Jurisdiction of the Department of Commerce.	066
p. 4.6-45: Please correct your "ebb tide" for currents ebb, flood and slack and tides rise, fall and stand. this page and the next give a partial view of the Esteros which may mislead people. As an area of unique National Significance they require special protection. You state that you have information that both bars are "occasionally opened by local land owners". This is not allowed and has not happened as far as I know since 1990. If you have a name of anyone you accuse of doing this activity please send it to the Sanctuary with the date and the name of the witness. Average salinity is completely misleading and says nothing about the complexity and diversity of the Esteros.	067 068 069
p. 4.6-82: How will you stop ammonia from getting outside the reservoirs?	070
p. 4.6-89: This project may not proceed if it has a significant impact on the Esteros as stated, will you drop this as an option from your lists of Alternatives?	071
p. 4.6-150: What are the numerical values of the biostimulating substances?	072
p. 4.7-3: The Sanctuary recently received notice that the City was increasing its water supply, it appears that water supply and waste water are correlated, why aren't these projects under the same EIR and what is the cost savings of designing a conservation system which rewards users for not using water?	073 074
p. 4.7-50: Given the weather variability why isn't October also a "potential mosquito" time?	075
p. 4.9-10: Why have you not listed the steelhead trout and birds of status?	076
p. 4.9-14: If increased runoff occurred, when the Estero bars are closed, can remove wading bird feeding habitat and also effect the quantity and quality of the available food.	077
p. 4.9-28: Why does this section fail to mention the wonderful work of the local farm community and the Shrimp Club in rehabilitating this environment?	078
p. 4.9-30: These numbers were developed in a drought year, what are the numbers for a rainy year and a 100 year rain?	079
p. 4.10-11: These rare habitats, which are an important part of the Sanctuary, require special protection from human activities.	080
p. 4.10-23: Hypersaline environments are also important, should they be mentioned here and elsewhere?	081
p. 4.10-37: The placement of the reservoirs (3A-3E), the irrigation and the emergency options will destroy areas of special significance. This is also true for page 4.10-50.	082
p. 4.14-14: Canoes and kayaks use the Esteros and when possible the two feeder creeks and these users will have their experienced changed all year long, but especially during the dry season.	083
p. 4.14-27: Bicyclists will also be effected.	084
p. 4.14-98: Agriculture change impacts not noted.	085
p. 4.18-2: Mariculture on Tamales Bay not considered and will need to be.	086
p. 4.18-13: Your document indicates that it is expected that herds could increase. A conservative estimate of herd size with irrigation is 450 animals per farm if farms decrease to 110- than animals in the area will increase from 35,000 in 1993 to 45,000 in 2010. How will the City stop this 30% increase and the resulting manure?	087
p. 4.18-18: This economic analysis is based on an elasticity of demand which does change due to supply, how is this possible?	088
p. 4.18-19: If irrigated land can support four times the number of animal unites as dry land, how will the City control the huge increase in manure, related water needs, hoof treatment chemicals, pesticide residues and other related conditions?	089
p. 4.18-27: Gross expenditures are not an accurate method of economic viability nor area impact. Profit is a better indicator, what good is producing \$42 hay if it cost \$42.01 to produce.	090
p. 4.18-32: Why use the 2017 time frame when the project is till 2010? Please give 2010 numbers.	091

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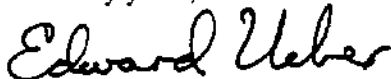
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- p. 4.6-3: Please define Inland for the Esteros are inland but they are part of the Gulf of the Farallones National Marine Sanctuary and under the Jurisdiction of the Department of Commerce.
- p. 4.6-45: Please correct your "ebb tide" for currents ebb, flood and slack and tides rise, fall and stand. this page and the next give a partial view of the Esteros which may mislead people. As an area of unique National Significance they require special protection. You state that you have information that both bars are "occasionally opened by local land owners". This is not allowed and has not happened as far as I know since 1990. If you have a name of anyone you accuse of doing this activity please send it to the Sanctuary with the date and the name of the witness. Average salinity is completely misleading and says nothing about the complexity and diversity of the Esteros.
- p. 4.6-82: How will you stop ammonia from getting outside the reservoirs?
- p. 4.6-89: This project may not proceed if it has a significant impact on the Esteros as stated, will you drop this as an option from your lists of Alternatives?
- p. 4.6-150: What are the numerical values of the biostimulating substances?
- p. 4.7-3: The Sanctuary recently received notice that the City was increasing its water supply, it appears that water supply and waste water are correlated, why aren't these projects under the same EIR and what is the cost savings of designing a conservation system which rewards users for not using water?
- p. 4.7-50: Given the weather variability why isn't October also a "potential mosquito" time?
- p. 4.9-10: Why have you not listed the steelhead trout and birds of status?
- p. 4.9-14: If increased runoff occurred, when the Estero bars are closed, can remove wading bird feeding habitat and also effect the quantity and quality of the available food.
- p. 4.9-28: Why does this section fail to mention the wonderful work of the local farm community and the Shrimp Club in rehabilitating this environment?
- p. 4.9-30: These numbers were developed in a drought year, what are the numbers for a rainy year and a 100 year rain?
- p. 4.10-11: These rare habitats, which are an important part of the Sanctuary, require special protection from human activities.
- p. 4.10-23: Hypersaline environments are also important, should they be mentioned here and elsewhere?
- p. 4.10-37: The placement of the reservoirs (3A-3E), the irrigation and the emergency options will destroy areas of special significance. This is also true for page 4.10-50.
- p. 4.14-14: Canoes and kayaks use the Esteros and when possible the two feeder creeks and these users will have their experienced changed all year long, but especially during the dry season.
- p. 4.14-27: Bicyclists will also be effected.
- p. 4.14-98: Agriculture change impacts not noted.
- p. 4.18-2: Mariculture on Tamales Bay not considered and will need to be.
- p. 4.18-13: Your document indicates that it is expected that herds could increase. A conservative estimate of herd size with irrigation is 450 animals per farm if farms decrease to 110- than animals in the area will increase from 35,000 in 1993 to 45,000 in 2010. How will the City stop this 30% increase and the resulting manure?
- p. 4.18-18: This economic analysis is based on an elasticity of demand which does change due to supply, how is this possible?
- p. 4.18-19: If irrigated land can support four times the number of animal unites as dry land, how will the City control the huge increase in manure, related water needs, hoof treatment chemicals, pesticide residues and other related conditions?
- p. 4.18-27: Gross expenditures are not an accurate method of economic viability nor area impact. Profit is a better indicator, what good is producing \$42 hay if it cost \$42.01 to produce.
- p.4.18-32: Why use the 2017 time frame when the project is till 2010? Please give 2010 numbers.

