

LETTER 13

## Marin County Community Development Agency

Mark J. Riesenfeld, AICP, Director

October 4, 1996

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

OCT 04 1996

Ms. Marie Meredith  
City of Santa Rosa  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404-1678DEPARTMENT OF  
COMMUNITY DEVELOPMENT

RE: Comments on Santa Rosa Subregional Long-Term Wastewater Project

Dear Ms. Meredith:

The County of Marin has been reviewing and commenting on Santa Rosa's wastewater project since 1989. Throughout this process County representatives have continuously expressed support for reuse of treated wastewater as a resource to benefit Marin and Sonoma agriculture. During the comment period on the previous EIR in 1991, the Board of Supervisors adopted a resolution objecting to discharge of treated wastewater into the Estero Americano and the Estero de San Antonio, opposing increased discharge into the Russian River, and urging consideration of multiple storage sites and water reclamation to benefit agriculture in Sebastopol, the West County (including Chileno Valley and portions of Northwest Marin) and the South County.

001

We are pleased that the present EIR/EIS goes much farther than the previous one did in providing detailed evaluation of storage sites and agricultural irrigation potential in all these locations. This information will provide the City with a basis for making a reasoned decision about a wastewater disposal system.

Although increased discharge into the Russian River appears to be the environmentally superior alternative and the one least expensive for ratepayers, it does not make use of the water as a resource. We recognize that the full implementation of any of the irrigation alternatives is extremely costly but we would encourage the City to pursue a phased project, making use of reservoir sites located closer to existing facilities before extending pipelines and building dams at remote locations. The EIR/EIS provides the information upon which a phased-in project could be designed, with incremental construction of water storage facilities, combined with the current level of river discharge, so that an end-state project would not have to be financed and constructed up front, with enormous costs to the ratepayers.

002

The EIR/EIS identifies the direct costs and benefits of each alternative. However, the multiplier effect of the irrigation alternatives is not considered. New construction and agricultural jobs would be created which would create additional jobs and sales

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throughout the region. Without a calculation based on multipliers for agricultural jobs, the economic benefits of the irrigation alternatives are underestimated. | 003 (cont.)

The potential for valuable "high tech" agriculture seems greater in South County than West County although the maximum dollar figures in the EIR/EIS for the West County are higher than the highest South County figures. The likelihood of producing high-value cultivated crops in the West County may be remote, given climate conditions and soil erosion potential. Irrigated pasture may be a more realistic scenario. Appendices E-1, 2, and 3 provide more detail than the body of the EIR/EIS and show that the South County has more suitable soil, climate and potential for higher value crops than the West County. | 004

Although Petaluma recently approved a wastewater disposal project which includes agricultural irrigation, it is not mentioned in the EIR/EIS. This project should be described and the EIR/EIS should identify whether there is potential for shared storage and joint management of irrigation with Petaluma as part of a South County alternative. | 005

We would like to thank Santa Rosa's staff and consultants for conducting extensive public outreach and providing numerous opportunities for public participation--at scoping sessions, briefings for agency staffs and interest groups, and meetings with interested parties. Supervisor Giacomini expresses his appreciation for the briefing by Assistant City Manager Ed Brauner and Patricia Collins of Harland Bartholomew.

Sincerely,



Carol Williams  
Assistant Planning Director

cc: Supervisor Gary Giacomini

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