

FROM : FAX FAD

PHONE NO. : 707 823 3555

Oct. 07 1996 02:43PM P1

Stegeman and Associates

Land Use Planning - Neighborhood Mediation - Environmental Compliance

CITY OF SANTA ROSA
P.O. BOX 10712
Santa Rosa, CA 95407

OCT 07 1996

DEPT. OF COMMUNITY DEVELOPMENT

October 7, 1996

Re. Santa Rosa Wastewater Draft EIR

The following comments are offered in addition to oral testimony previously submitted.

Page 4.5.56-57 Groundwater impacts of project discharge components

001

The DEIR is inadequate in that it identifies no impact for all alternatives, based on the stated conclusion that "reclaimed water discharged into the Laguna...will not enter groundwater because the water table slopes toward the stream". Extensive studies conducted by the City of Sebastopol have shown that the groundwater/surface water relationship in the Laguna area fluctuates both with the season and the annual runoff pattern (wet vs. dry years). This study has demonstrated that 15% or more of the groundwater supplying the Sebastopol city wells is from the Laguna. Considering that the Laguna can sometimes consist of up to 80% treated wastewater, there is a clear potential for Sebastopol's water being comprised of over 10% treated wastewater.

The DEIR needs to address the following:

002

-conduct additional studies to reconcile the results between those presently cited in the DEIR and those of the Sebastopol study;

-reflect the potential for groundwater impacts for project 5B as significant, unless a mitigation level comparable to those already provided relative to Evaluation Criteria 5.5.1 and 5.5.2 and projects 2 and 3. Specifically, an alternative potable water source should be offered to the City of Sebastopol consistent with that offered in mitigation 2.3.12.

003

Page 4.6.142 Results of Cumulative Impacts Assessment for Discharge

004

The DEIR is inadequate in that it states acknowledges that no cumulative impact analysis was done for the Alternative 5B in other than the "normal" hydrologic year. This is obviously an inappropriate response, since the 20% discharge scenario is most likely to be exercised in the "dry" hydrologic year, for which there is no analysis. Moreover, the DEIR itself makes a sweeping generality by declaring "Because wet and dry years were not evaluated for the cumulative scenario, it is not possible to say that Alternative 5B will always be without significant impacts. However, this analysis illustrates the fact that there are few significant impacts of Alternative 5B, and they are reduced by implementation of the Regional Board's nutrient load reduction strategy." This is not an acceptable level of analysis, nor a basis for concluding that the results from a "normal" year cumulative analysis can be extended into conclusions regarding a "dry" year. This is particularly true given the tremendous difference in water flow interactions and dilution between these two weather year scenarios.

005

The DEIR needs to specifically address the following:

006

-cumulative impact analysis for surface water quality under a "dry" and "wet" year scenario.

-address possible project specific and cumulative impacts associated with varying implementation of the nutrient loading strategy under different weather scenarios.

007

2727 Montecito Avenue - Santa Rosa - California 95404

Phone: (707) 538-4770

