

Russian River Watershed Protection Committee

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March 16, 2009

To: Sonoma County Board of Supervisors

Re: Russian River County Sanitation District Equalization Basin Storage Project

Dear Supervisors:

Tomorrow morning you will consider final certification of the Russian River County Sanitation District (RRCSD) Equalization Storage Basin Project (Storage Project) EIR and selection of the project. As you may know, RRWPC has submitted extensive comments on this project along with Jane Nielson, geologist, Ray Waldbaum, geologist, and Ellison Folk of Shute, Mihaly, and Weinburger. We are writing to notify you of concerns we have about inadequate notice, inadequately examined impacts, inadequate responses in the final EIR, and inappropriately holding up release of the Final EIR.

Jane Nielson and Ellison Folk are submitting separate comments on other problems with the project. We hope you will read all comments before the meeting tomorrow.

Procedural Issue:

RRWPC was shorted six days in reviewing this FEIR. We could have used that extra time preparing our submission. We had exchanged emails with Jeff Church asking when we could obtain the Final EIR. His email response indicated that we could obtain it on March 2nd. But in the Board packet for this item, on page B1-2, at the top of the page it notes, "*On February 24, 2009, the District released the Final EIR....*" I had sent Jeff an email on Feb. 12th asking when the FEIR would be available. He did not respond until February 17th after I had sent a second message, in which he told me that, "*The EIR will be available on the 2nd.*" I attach the email exchange.

Neeley Road Issues

Neeley Rd. is about a two and one half mile substandard country road running through a residential area that deadends at the RRCSD Treatment Plant. Many of the homes are occupied in the summer only when construction will take place. About the first third of the road is in decent shape and wider than the part further in. There is a considerable segment of several thousand feet (we estimate) that has barriers along the side and a steep drop off the edge. It is likely that that is the portion where the road collapsed during saturated conditions and will need to be limited to one lane during construction.

As you get further along, and closer to the Treatment Plant, the road gets much narrower. We estimate it is no more than 12' across in many places (SCWA staff states that they will "clear brush and cut a few limbs" to widen to 20' so two trucks can pass one another.) The road has many blind curves, at least one third of it is far less than 20' across; there are steep slopes along the edge of the road; there are private fences right up to the road; there is parking along narrow parts of the road where homes don't have their own private driveways; there are significant drainage problems along the road in many areas; there are slide areas; there are many mature redwood trees that would need to come down to make 20' across; the pavement is badly cracked in many places, and on

and on and on. We will submit pictures of the road with our presentation later today or tomorrow morning. There are no sidewalks and people walk and ride bikes along the road. There was no attempt to address the safety hazards related to that use with the exception of timing truck trips to avoid school buses.

While notice about tomorrow's meeting was extensive, there was no attempt to explain in a meaningful way to the residents of Neeley Road about any of the significant traffic impacts they could expect to affect their lives during a whole summer of construction. Also, we believe there will be significant safety issues resulting from this project. In fact the DEIR states that people will be notified about traffic issues '*before construction*'. We believe that this notice should have been part of this DEIR process. Furthermore, there has been no attempt to describe the compounded and similar impacts from the Disinfection Project, to occur the prior summer, which will also involve a significant number of large truck trips down that road. What agreement about road maintenance would occur there?

We were able to contact about 30 people in that neighborhood and most have to work on Tuesday morning and cannot get to the meeting. Many of the homes there are occupied only in summer and they have no idea about the future truck traffic. It is common for people to walk along the road and/or pets to be on the road. Given the sizable impacts that will come their way, it would have behooved the District to hold a community meeting in order to explain the situation and give local working citizens an opportunity to voice their concerns at an evening meeting that they could attend.

I had not been down Neeley Rd. in years, when I read the DEIR and was not focused on road, traffic, and safety impacts this project would have on local residents. While the DEIR did mention that there would be 9200 truck trips down the road, they described the road simply by stating that it is one lane in places (pg. 3.7-1) and that repairs are being made to portions of the road that had been damaged during flood events.

There was a comment letter from the County Roads Department (Letter A1) expressing concern about road repair after project completion, responsibility for costs of repair, possible maintenance during project. They state, "*The roadway will need to be cleared of brush and tree limbs for both vertical and horizontal clearance. A minimum of 20' of roadway needs to be cleared in order for trucks to pass each other. Centerline striping will need to be placed prior to commencement of work. Striping will need to be replaced after placement of asphalt concrete overlay at the end of the project.*" The response to this comment directs the author of the comment to mitigation Measure 3.7-2 it stating, among other things, that a minimum of 20' of roadways shall be cleared of brush and tree limbs for trucks. In addition, SCWA would consult with the Roads Department before the project begins to insure necessary maintenance activities and improvements be conducted. **THESE MEASURES WOULD NOT ACCOMPLISH THE REQUIRED MITIGATION.**

There are many places on this road where two cars can barely pass one another and dangerous situations occur when cars go too fast and there are pedestrians, including children and bicycles on the road. We will provide pictures of the road so you can visualize what we are talking about. There is no discussion in either the DEIR or the FEIR about safety concerns along the road. We don't see anyway this road can be consistently widened to 20' in all places without major tree cutting, drainage improvements, right-of-way agreements with property owners, fence adjustments, hillside alterations, etc. Even then, it may be an impossible task. Simply saying a few limbs will be cut and brush cleared is not going to accomplish the desired results.

The DEIR and FEIR considers 92 truck trips a day down a rural road over a four month period to not cause any long range impacts. This may be true if the project were adequately planned and many more details worked out, but this is not the case. There is

also no consideration of the prior Disinfection Project that could have similar impacts, and their cumulative effects. That would cause a two-summer disruption of hundreds of lives along this route that is barely defined.

The mitigations consist mostly of notices to be provided before construction begins. The findings noted in the Board Packet (page 9) state: *"The Proposed Project would not change the design of existing roadways and does not include any operational features that would impact traffic or increase hazards."* This simply is not true. If the road is required to be 20' across with a white line down the middle, as noted in the Road Department's requirements, then there MUST be significant road improvements needed causing large trees to be cut, new drainage installed, loss of parking for some residents, possible alterations of private property, etc. This is not a minor situation. (The reason these local roads do not have white lines is because they do not meet road standards. If they have to bring them up to standard, that is a major undertaking, and not a minimal one as implied.)

Most of the mitigations listed on page 9 of the Board Packet do not address these issues. In most cases, they just notify citizens, schools (re: buses), and involved agencies, of what they are going to do and when they are going to do it.

RRWPC asks that the Board delay certification of this project until these significant traffic and safety issues on Neeley Rd. are addressed. It would be very sad if some tragic accident should occur as a result of poor planning on this project.

Sincerely

Brenda Adelman: Chair
Russian River Watershed Protection Committee

PS: We are also still very concerned about the geological aspects of this project and expect that Jane Nielson will be addressing those issues in a letter she is expected to submit today.

We would like to add one additional comment on the issue of RRCSD Regionalization. We have gone on at length about this issue and your documents also respond extensively. The gist of the response is that the project is not intended to serve other communities, but merely to address current water quality needs of the system on behalf of current ratepayers. We are still concerned about bifurcation of the project and refer you to Ellison Folk's comments on our behalf.

We acknowledge that additional storage is needed to address water quality problems of the current system. That does not preclude however, as the responses imply, that it is not also intended to hook up Monte Rio and possibly hundreds of properties in the area that are currently on septic. We have said all along that an adequate environmental review should occur before that happens.

There is plenty of evidence, alluded to in the past of the real possibility of such a situation. For about two years, SCWA was meeting secretly with Occidental, Camp Meeker and Regional Board staff on the issue of hooking those communities to the system. Their EIR stated that there was capacity in the system and there is no way the County would finance an almost \$200,000 EIR process to hook them up to an inadequate system. The intent to regionalize has appeared in many documents over the years and can be easily validated. We stand by all our original allegations on this issue.