Russian River Watershed Protection Committee
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To: Glen Wright
From: Brenda Adelman
September 30, 2008
Via Email

Re: Discharge Compliance Project: Final EIR

RRWPC Comments: Request for Delay in Certification

Please share this letter with members of the Board of Public Utilities, City Council members, staff, and any other pertinent participants in this process.

This Final EIR on the Discharge Compliance Project, part of the IRWP Program, includes a major alteration of the D1 (Steelhead Beach) alternative and was made public only eight days ago. While we are pleased that Osprey Trail will be far less impacted, we do not believe that other resulting impacts from this project alteration are adequately addressed or addressed at all.

We are also distressed that, while the EIR was released on September 22, 2008, we were unable to get a hard copy from ARC until Sept. 24th, even though we had called on September 19th to order it. The final EIR certification is scheduled for October 2, 2008, giving us only eight days to study and review this final version. The City had given us no clue all this time that a major project revision was being considered.

Below, we raise major questions about potential impacts from the changed project. We request that you delay certification and provide the public with the opportunity to comment on these revisions. As we explain below, the change in project can have major impacts on the local environment, several of which are not even reviewed in this EIR. We refer specifically to the pipeline construction in the half-mile west on River Rd. between the entrance to the Park and the place at which it turns into the park property (across from Rio Vista Road?).

River Road Impacts:

The greatly altered Final EIR description of D1 contains no discussion of River Road traffic impacts and conditions west of the entrance to Steelhead Beach Park during the 18-month construction period of this project. There is no information on the number of

trees to be cut or the visual and environmental impacts from cutting trees along River Rd. The only traffic related impacts that were mentioned, were the number of trips generated by the project.

There was no mention of the limited shoulder and the significant drop off from the road and the significant barrier in place to protect people and cars from the drop off. There is no discussion of the difficulties and dangers of traffic navigating past the construction site during heavy storms and floods, especially at night. This can be a very dangerous condition that is not even discussed in this EIR.

There is no discussion of how back-ups will affect traffic at Mirabel. There is no description of the importance of River Rd. as a main artery to the West County and the Coastal regions. There is no description of how a 45'-50' work area would be maintained when the whole road corridor is about that wide. If you needed 50' on Osprey Trail to install the pipeline, how could you get by with about 30' in order to keep a lane open? I don't recall discussion of whether fill would be needed to construct the road through the park to the river and what impact that would have on flooding and on River Rd. (The significant drop off helps to keep flood waters off River Rd. until the river reaches a fairly high stage.)

This portion of River Road is a very sensitive area. It's hard to imagine how the 50' will be provided for pipeline construction in this narrow part of the road. The public has and will have a lot of questions about traffic in this stretch under all weather conditions, including ingress and egress to the various side streets such as Argonne Way, Rio Vista, and Champs d'Ellysses. Where will equipment and vehicles be parked during construction? How will the 50' construction zone be realized in this area? How will safe traffic conditions be guaranteed?

We also wonder about how many trees will be cut? The Parks Department was forced to alter an improvement project to avoid cutting most trees. Citizens were outraged that they had to cut some redwood trees near the entrance for public safety concerns. If trees need to be cut for this project, the public has a right to know, yet nothing was stated in the final EIR. This is information that we MUST have before this document is finalized.

Also, we need to have a better idea of what conditions to expect, and the impacts to our lives during winter and possible flood conditions. What conditions can be expected if the construction zone is inundated? How will this impact traffic safety on River Rd.? How will this construction impact tourism, both in this area, and the whole Russian River area. This project will have enormous tourist and traffic impacts that are barely described in this document, possibly carrying over for more than one season. Given the environmental sensitivity of the area, we wonder if you can even get the project done in 18 months?

Continued Concern About Capacity Determinations

RRWPC continues to disagree with the primary goal and assumption for this project: that it is necessary to build a system that accommodates dry weather flows of 26 mgd. We could argue from now to doom's day, but the responses repeatedly fail to address

the issues we raise in a meaningful fashion; it appears that our basic assumptions are in conflict and cannot be resolved. We have demonstrated time and again how the numbers upon which this project is based are "gerrymandered" to facilitate an extremely bloated and over-sized project.

Because we have studied actual numbers and the document focuses on projected numbers, there has been a real disconnect in communication on this issue. While the City has provided a lot of technical data, they have never really explained why our analysis is wrong and their analysis is right. We will continue to disagree on this issue. For instance, during the wettest year since 1992, the highest flow to Santa Rosa's Treatment Plant was in 1998 with 8.67 billion gallons (BG). Sending an average of 16 mgd to the Geysers amounts to almost 6 BGY. Add 3 BGY of irrigation and you have a greater amount than the wet weather flow of any year since 1992! If there were a serious program of infiltration and inflow repairs and more storage, the City would have absolutely no problem without river discharge for a long time to come.

The City's response was to cite flows from 1983, ostensibly the wettest year of "recent" record and projections were based on flows that year. What fails to get mentioned are the major changes to the Laguna Subregional system implemented since then however, which significantly changes the picture. Changes include a great increase in conservation, especially in regard to toilet retrofits, and some of the leaky pipes have been fixed. High flows to the treatment plant in 1983, would probably have not occurred with today's infrastructure. In fact, with a more water-tight system, it would matter a lot less whether the weather is wet or dry. Fixing leaky pipes would provide a truly weather independent system.

It is interesting that per capita water use data is mentioned as a key measure upon which capacity is based. One top engineer at the Sonoma County Water Agency (SCWA) stated in a recent meeting that it is impossible to really calculate per person use since there are too many unknown factors, such as how many people are really living in a household, who's away temporarily and for how long, how many pets are sharing the use, etc. It is also problematic to calculate commercial and industrial use in the mix. How would this get characterized in City projections? It seems as though the actual total use is the most meaningful and truthful measure in projecting future capacity needs.

Furthermore, the current water crisis and the results of the Biological Opinion, which just came out, contain unknown factors, which could not be fully calculated in this EIR analysis. It is our understanding that the Biological Opinion of the National Marine Fishery Service is calling for 85 cubic feet per second flows at Hacienda during a normal year. For at least the next 8-10 years, this is likely to greatly diminish any increased supplies available to the City unless local wells can compensate for the shortfall.

Diminished water supplies translate into lower sewage flows and less need for expansive wastewater discharge infrastructure. This is partially demonstrated by the fact that actual flows to the treatment plant have remained virtually constant since 1992, an amazing statistic considering that the City has increased its population by at least a third in that time.

There is another point regarding capacity we would like to challenge. The comment responses insist that capacity must accommodate peak HOURLY flow. This may be true for the Treatment Plant processes and it is true for other systems that don't have much storage, but the City has 1.5 billion gallons of storage and is planning for 500 million more. We don't see why it must be true in this situation.

If the AVERAGE daily flow is no more than 32 mg to 35 mg during wet weather, then a peak of 70 or 80 mg would last a relatively short amount of time. Given that we now have the potential to send 20 mgd to the Geysers and are approaching 2 BG storage, it doesn't follow that the City needs up to 69 mg of discharge capacity also (proposed for D1). There is no doubt that this project is NOT being proposed to serve only current General Plan Projections, but is carrying system capacity far out into the future with this project.

Finally, we all know there are unlimited ways to manipulate data to have it produce the results you want it to. We believe that this is the case here.

Comments on Master Response J: Land Use, Recreation, Resource and Economic Impacts at Discharge Site D1

Discharge Site D1 is described in the Final EIR as being 1,000 feet downstream of the main beach at Sonoma County Steelhead Beach Regional Park. This implies that the major recreational use is upstream of the proposed diffuser location. Yet we have visited the Park on numerous occasions, as have others in our group, and found much, if not most of the beach use to be DOWNSTREAM of the proposed diffuser. We have many pictures to show heavy use of the downstream beach.

We ask that the Final EIR be corrected in its description of D1. It is interesting that the Draft EIR correctly stated the project is 400' upstream of Children's Beach. Then the response to Vesta Copestakes (Comment 416-4) states, "*The D1 discharge site is at the downstream end of the Steelhead Beach Regional Park, so recreationists visiting the Park would not be swimming downstream of the discharge facility. Swimming opportunities, of course, do exist downstream of the Park, for example at Children's Beach.*" So exactly what is meant here? What are the impacts to swimmers downstream of the diffuser? This response fails to convey the popularity of Children's Beach and appears to minimize the impact this project will have on those who recreate there.

Why did the Final EIR change the focus of recreational use at the two major beaches at either end of Steelhead Beach Park? It appears that the intent was to minimize the impacts on recreation on this resource. In several places it is implied that ONLY the west end of the Park will be affected by the project. It fails to emphasize that this is a relatively small park and ALL of it is heavily utilized. Any project at the west end will have a major impact on enjoyment of the whole place and is very likely to inhibit use because of the long-lasting heavy construction (noise, dust, visual impairments, etc.) that will occur there.

Similarly, the focus of this revision emphasizes that only a small section of Osprey and Willow Trails (west end) will be closed off along with the portion from River Rd.

crossing through the Park and over to the river. In truth, people use the two trails to make a loop, as one joins the other. Noise levels and construction conditions will probably be intense for the entire time of recreational use, and will prohibit people from enjoying any part of those two trails, let alone having access to Children's Beach, the favorite of the two beaches. **There is no way that this project will not offend those who walk those trails in order to enjoy peace and tranquility. This project will destroy the ambience, no matter where in the Park it is located.**

Somewhere in the Final EIR it is stated that construction time would be 18 months. I don't recall that being mentioned in the Draft EIR. That means the either two winters or two summers would be affected by disruption from this project. Was this mentioned in the Draft EIR? We don't recall asking many questions about impacts from flooding onto a project that disturbs a great deal of sand/soil during a lengthy period. We don't recall a full discussion of this issue. While serious impacts from sediments may have been noted, the scope of the problem was not described in any detail. Most of this parcel is in the floodway and gets inundated before any major flooding occurs. What is the plan for dealing with this?

While the DEIR mentioned that recreation and park use would be affected while construction was taking place, we could not find where it mentioned the amount of time needed for that to occur. The final EIR mentioned that the project would take 18 months to construct, but there was no discussion of how long each component would take and how long impacts would be incurred with each component. (P. J-13) The Final EIR states, "*If discharge facilities at Site D1 were constructed, restrictions on recreational use of Steelhead Beach Regional Park would occur for approximately 18 months*." Will that involve two summer seasons? We still don't understand how sediments will be controlled during diffuser construction and in the Park and River areas during floods and very wet periods.

Suddenly, the scope of the problem appears much more threatening. The mitigation to allow boating while the diffuser is being built would involve directing boat traffic around a coffer dam. To the boaters and canoeists, this is bound to look and feel like an industrial zone, hardly providing the relaxing ambiance of a cherished vacation spot. What will be the impact on tourism if this goes on for two summers? What will be the residual impacts on tourism if people know a giant wastewater discharge facility is being built in one of their favorite areas to boat and swim? The City already takes much of our river flow to quench your thirst, what gives you the right to thrust your treated waste directly into our cherished environment? There are many artists and spiritual people, who value nature over the things money can buy. Our environment is everything to us and we are determined to protect it.

Where will the funding come from?

It was announced by the Press Democrat, in an extensive article on September 27, 2008, that the City of Santa Rosa has more than a $10 million dollar budget deficit and will have to cut many programs. Among other things, it is proposed that dead animals not be picked up in the road, that half the street lights be turned off, and fewer police officers on patrol to keep people safe.

Our economy is imploding and the Senate and House of Representatives recently refused to pass a bill providing a nation-wide package of infrastructure improvements. Homes are being abandoned left and right and population growth in our area is probably at a standstill because of the very high cost of living here. We originally asked about the impact from the failing economy on this project and the gist of the EIR response was that CEQA does not require responses to economic concerns. YET CEQA DOES NOT PROHIBIT AN ANALYSIS EITHER and we believe that such an analysis is necessary.

For all of these reasons, RRWPC and the citizens and lovers of the Russian River ask you to fully address all these issues. Please do not certify this Final EIR without first addressing the issues raised in this letter. The public wants and needs the opportunity to weigh in fully on this project, which will have a major impact on their lives.

Sincerely,

Brenda Adelman