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February 5, 1987

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Wayne Goldberg, Director
Department of Community Development
Santa Rosa City Hall
100 Santa Rosa Avenue
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Subject: City of Santa Rosa Long-Range Wastewater Management
Plan: Draft Environmental Impact Report

Honorable Members of the Santa Rosa City Council
and Board of Public Utilities,

While I am unable to attend today's meeting, I have directed my staff to present my comments on the Draft Environmental Impact Report for the Long-Range Wastewater Management Plan for the Santa Rosa Region.

As you may know, I have been an active participant, on behalf of my constituents, in each step of the long process that has resulted in today's hearing. I have consistently advocated reclamation and reuse of the treated effluent for agricultural and other resource enhancement purposes. Nothing contained in the Phase II Report: Evaluation of Alternatives, (December 1986) or the DEIR persuades me to abandon that position. To the contrary, many of the inadequacies of the DEIR lead me to believe that a responsible analysis of the pertinent issues would conclude that a modified Irrigation-Marsh-Bay system would be the preferred alternative on the basis of environmental effects, economic considerations and public acceptability.

My comments will focus briefly on issues related to conformance with the California Environmental Quality Act (CEQA) and then I will address the ocean outfall and marsh/bay alternatives.

Conformance with the California Environmental Quality Act

It's essential in making sound public policy to ensure that decision makers and the public clearly understand the ground rules and follow them. In this instance, CEQA sets forth the statutory requirements.

Serious questions have been raised regarding the DEIR's conformance to CEQA Guidelines. I would like to echo those concerns and, in the interest of time and avoiding duplication of effort, refer you to the comments presented by the County of Sonoma and comments made by members of the North Coast Regional Water Quality Control Board at their public hearing on January 22.

What is the specific purpose of this EIR? Please give us a clear, timely answer to this fundamental question. I think we can all agree that avoiding the necessity for judicial interpretation is in everyone's best interest.

Wastewater Alternatives

Recent events make it clear that the Geysers and indirect disposal to the Russian River have, for all intents and purposes, been excluded from further consideration.

Ocean Outfall

I think it's important to remind ourselves that the commitment to coastal protection is not confined to a few fishermen and coastal residents. A December, 1985 Mervyn Field California Poll (San Francisco Chronicle, December 19, 1985, Pg. 9) drives the point home:

"Following is a list of six of the act's (California Coastal Act) provisions and the degree to which the public thinks each is 'extremely important.' (emphasis added.)

Controlling ocean toxic wastes and sewage disposal	93%
Preserving the coast's scenic beauty	81
Preserving coastal wetlands and wildlife habitat	77
Protecting sensitive coastline areas from offshore oil and gas drilling	72
Guaranteeing public access to beaches and coastal recreational opportunities	66
Controlling coastal residential and commercial development	57"

Locally, successful efforts to block the proposed Bodega Head nuclear power plant, and the overwhelming 74% yes vote last year for County Measure A should not be ignored.

Against that public opinion backdrop I offer the following comments on ocean outfall.

Significant/Potentially Significant Impacts

It's incredible that the DEIR fails to identify either significant or potentially significant impacts related to this alternative. I believe the following could be at least potentially significant impacts.

1. The Bodega Marine Lab (BML)

The public has a substantial investment in the BML. Its most important value is its comparatively unpolluted environment.

The EIR attempts to sidestep this issue by stating "...other similar institutions (Moss Landing Marine Laboratory, for example) appear to function successfully in the vicinity of wastewater discharges." (6-43)

-Why did the EIR authors apparently ignore the communications from the BML of May 23, July 7, July 23, August 13 and August 20, 1986 regarding this and other issues?

-What is the economic value of the BML and how would that value be diminished by the proposed outfall?

-What other values would be compromised?

-Why is no mitigation included for the potentially significant diminution in value of the BML's function in the State's Mussel Watch Program?

2. Fisheries

The clean coastal environment in Sonoma County certainly adds to the value of our fishing industry. Has the marketability of fish caught near existing outfalls been affected? What are the potential impacts on the local fishery?

3. Construction

Construction impacts are inadequately addressed. The EIR says, "The impacts of construction, although short-term, are of concern to some." (Pg. 2-2)

You bet they are. They are of concern to every resident and business person west of Santa Rosa. They are of concern to every local recreationist and every tourist who visits western Sonoma County. And the concerns are significant.

How long will local business districts be disrupted and what will it cost them? How long will local residents suffer the inconveniences of pipeline construction? What are the specific potential impacts on slope stability in areas like Pocket Canyon?

When the EIR says that "construction activity would disrupt recreation activity" at Sonoma Coast State Beach for 8 to 12 months, what does that mean in terms of lost visitor days? And how many people won't come back to Salmon Creek to share that beautiful spot with an ocean outfall?

Irrigation-Marsh-Bay

While the ocean outfall analysis is woefully inadequate, particularly in failing to address impacts, the major weakness of the marsh alternative analysis is its failure to address potential benefits.

What is the potential resource value of the reclaimed wastewater? The EIR says, "it was apparent that any alternative that did not involve the continued use of the existing wastewater irrigation system would probably have an adverse effect on the local economy and the natural resources of the Laguna de Santa Rosa." (p.4-15) It seems obvious, based on the EIR's own observation, that there is a potential benefit to the local agricultural economy. Conversely, I believe that ocean outfall should include the value of this potential benefit as a cost of going to the ocean.

Other potential marshland benefits have been similarly ignored. This should be of particular concern to system rate payers. The estimated future sewer service fees (pg. 17-13) should reflect the potential effect of other funding sources that might be available for a marsh system.

Those sources could include:

- A state appropriation to purchase potential marshlands near San Pablo Bay.
- Coastal conservancy funds including the possible use of the marsh as a "mitigation bank" for other Bay projects.
- Fish and Game management and potential fees if the marsh system creates appropriate waterfowl habitat.
- Participation of educational institutions in research efforts.
- Increased visitor days to Sonoma County. The Arcata Marshland project attracts a significant number of visitors. What is the potential impact on Sonoma County's tourist industry and how could it serve to lower sewer service fees?
- Private grants from organizations dedicated to resource enhancement.

What other important environmental values are inherent in marshland creation? What is the value of the freshwater resource to the Bay? These questions need to be adequately addressed before anyone can make an informed decision regarding a long-range wastewater management plan.

Much of the discussion regarding the marsh alternative has focused on regulatory problems. I believe, that if Santa Rosa joins in a cooperative effort with the other cities, the County of Sonoma and interested parties, the regulatory hurdles can be overcome. I stand ready to assist in any way I can.

I also think it's important for the City and other interested parties to request an additional extension from the North Coast Regional Water Quality Control Board. Our mutual concern is finding the solution that is most environmentally sensitive, that has the least impact on local ratepayers and that can generate widespread public acceptance and support. I know the Regional Board shares those concerns and would, I believe, be receptive to granting some additional time.

The policy decision facing you is perhaps the most important issue that Sonoma County will face in this decade. Its impacts will certainly be felt for at least three decades. It is a decision that cries out for creative approaches. I believe that a cooperative effort can result in a beneficial solution.

01-7, fig. 2

Comments on Wastewater DEIR by Assemblyman Hauser

Page 5

I urge you to direct the responsible parties to address the serious inadequacies in the DEIR so that your decision can be based on the best available information.

Thank you for this opportunity to address my concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Hauser". The signature is stylized with a large, sweeping "D" and "H".

Dan Hauser

DH/ae