

JUN 18 2007

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FRESNO, CALIF.

June 15, 2007

Mr. Doug Patterson
California Regional Water Quality Control Board
Central Valley Region
Fresno Branch Office
1685 E Street, Fresno, CA 93706

Re: Comments on proposed SK Foods process water land application project

I make the following comments on the proposed SK Foods process water land application project because my home is immediately downwind of the project site, see attached map, and my years of experience of both observing and dealing with this water. As a property owner immediately downwind of this project site, it would seem to me that I would have been formally notified by your office of this project and received a copy of this study, or a later study and invited to make comments on it. To date I have not been notified, and SK Foods provided this document to me at my request.

The document that I am commenting on is titled, SK Foods, CEQA Initial Study, dated October 10, 2006. The document was prepared by Brown and Caldwell. Instead of commenting on each section of the document, I will limit my comments to the sections that I have concerns with. These comments center primarily around the summer and early fall applications of the process water while the SK Foods plant is processing the summer harvest. The intermittent application of water during the rest of the year and its affects are unknown at this time, but are not as likely to be an issue.

Section III Air Quality

My comments here are directed to subsection (e), Objectionable Odors. The migration of odors generated by this water has been a continuous historical problem. Even with very good management of the application which would minimize the time this water remains on the surface of the ground, odors can rapidly become a problem. The transport of the water in open canals within the project area will lead to the very real possibility of this water ponding and going septic due to the waters extremely high Biological Oxygen Demand (BOD) levels, prior to it being applied to the land. Once this water goes septic, the residual odor can be tenacious. Historically, the mixing of this water with fresh water during the irrigation process has not mitigated the odor potential.

I am not sure that only requiring this water to infiltrate the land within 48 hours will be sufficient. Management will be a key factor to minimize the impacts. Time will tell.

John Howe

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Section VI Geology and Soils

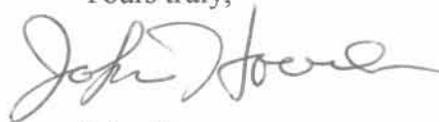
The comments here are mainly addressed at subsection (d) and (e). The infiltration rates of the soils in the project area are variable due in part to the different clay soil types and the topography of the lands this water is proposed to be applied to. Some of these lands cannot be successfully irrigated with a furrow surface applied system due to their present topography, which adds to the potential of the ponding of water, and the runoff of tail-water. Due to these soils being clay in nature, the infiltration capacity tends to decrease with each application of water during the crop growing season. This will result in a decline of the ability of the lands to hold this water. Increased management of the process water will be required as the summer application season progresses in order to keep the water from or running off the project site and ponding.

Section XII Population and Housing

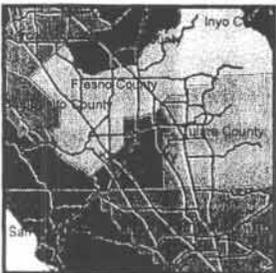
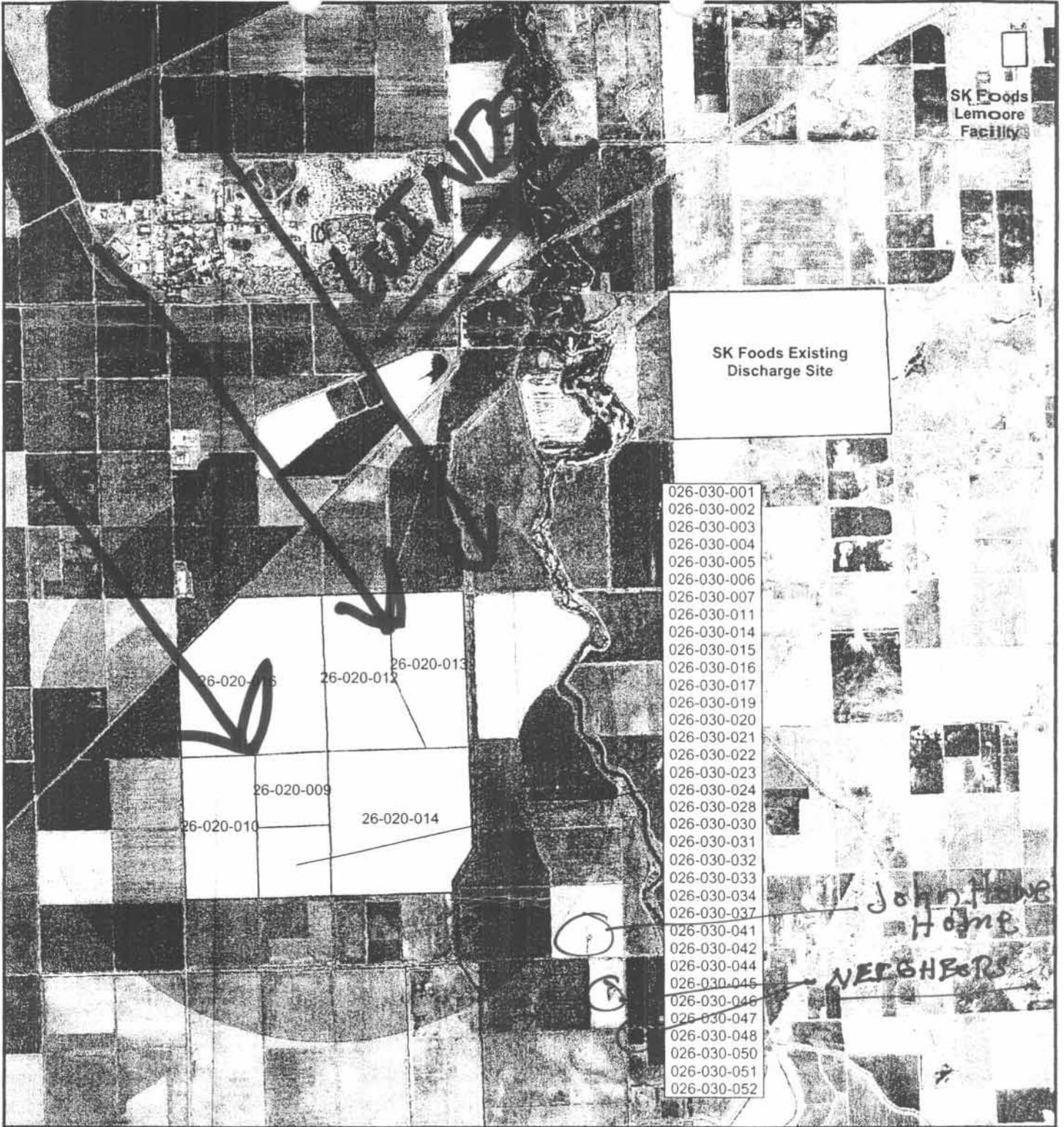
Whether this project will displace people or housing remains to be seen. The housing in this area is incidental to local farming operations. Most of the homes that have a potential to be affected have been here for 50 years or more. Whether something is substantial or not depends on the effected parties.

In closing, I will state again that I have had personal experience with this particular processing water. The odor potential is tremendous, and keeping it confined to the project area as described will be difficult. It will be impossible unless all the measures outlined in this document, or modified measures as found to be needed in the future are undertaken. The plant manager of SK Foods has assured me that this project will be a good neighbor. I am not too concerned with occasional short term odors that may occur from time to time, but I will be concerned if this project alters the enjoyment of my home and property in any substantial way.

Yours truly,



John Howe



Legend

- NEPA Investigation Area
- WWD Project Boundary and Parcels



1:60,000

Project Map SK Foods, Lemoore, California	
PROJECT 130335	DATE 4/17/06
Figure 1	