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CEQA INITIAL STUDY AND DRAFT NEGATIVE DECLARATION, PROPOSED SK FOODS LAND APPLICATION PROJECT, KINGS COUNTY

In a 15 June 2007 letter, you expressed concerns regarding a proposal to discharge wastewater from the SK Foods tomato processing facility to an approximately 2,600-acre area northwest of your residence. Your concerns had to do with objectionable odors, the topography of the property and the clayey nature of the soil limiting infiltration, and the project displacing people and/or housing.

SK Foods' consultant initially prepared and submitted to the Regional Water Board the October 2006 CEQA Initial Study. The purpose of the Initial Study was to describe the proposed project, discuss any potential concerns, and identify steps to be taken as part of the project to ensure a significant impact is not created. As Lead Agency for CEQA, Regional Water Board staff reviewed, edited, and circulated the Initial Study and a draft Negative Declaration for the SK Foods project in May 2007. The Initial Study discussed several potential concerns, including those you reference.

SK Foods proposes several measures to prevent odors as part of its project description. The project will include the use of a 0.020-inch rotary screen to reduce solids in the wastewater stream by filtering it before discharging wastewater to the spreading areas. SK Foods proposes to apply wastewater at rates that will allow it to infiltrate within 48 hours, minimizing the potential for odors, and to inspect the fields at least daily when wastewater is being applied. Should standing water or odors be observed, SK Foods will increase the frequency of the rotation of the irrigation checks which in turn will minimize soil saturation and the potential for ponding and odors. If certain areas are found to be saturated and allowing water to stand, those checks can be bypassed and irrigation of those areas discontinued temporarily. In addition, wastewater will be blended with irrigation water before distribution, which in turn decreases the potential for odors to form. Following distribution, pipes and ditches will be flushed with fresh water.

Concerning site topography, the Initial Study (Section VIII, Hydrology and Water Quality) recognizes that some grading of the project site will be necessary to prepare it for the application of wastewater. The grading of the land used for recycling will ensure that wastewater is spread evenly over the property and will minimize the chance of even short-term ponding.

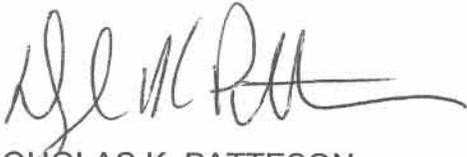
California Environmental Protection Agency

The predominant soil types on the project property are the Lethent Clay Loam (approximately 65 percent) and the Panoche Clay Loam (approximately 30 percent along the southern property boundary). These soils are reported to be moderately to well drained, but are generally saline in nature. The discharge area also contains lesser amounts of the Pitco Clay in the southeast corner, and the Tulare Variant Clay along the eastern property boundary. The clay areas of the site can have infiltration issues. However, SK Foods proposes to plant crops such as tomatoes, winter wheat, corn, and Sudan grass. The soil will be disked before planting, increasing the infiltration rates of the soils. SK Foods crop management will include rotation of crops to allow for cultivation and distribution of the wastewater being applied over the approximately 2,600 acre disposal area. The large size of the site and the rotation of the areas used will allow ample time for drying of the soils. If necessary, SK Foods will add soil amendments to improve salinity and drainage in these soils. In addition, wastewater will be screened, reducing the effect of solids to diminish the percolation rates of the surface soils.

From review of aerial photographs, the proposed project will not displace any existing housing. The proposed application area is currently used for agricultural purposes and no houses appear to be present within the actual disposal area.

Once the CEQA process is complete, Regional Water Board staff will draft tentative waste discharge requirements for consideration by the Regional Water Board. The waste discharge requirements will contain specifications and limitations to require that SK Foods implement the project as described in the Initial Study and that the proposed project does not create a condition of pollution or nuisance. The waste discharge requirement will include a monitoring and reporting program to ensure that all measures described in the Initial Study as part of the project are carried out. Before adoption, the waste discharge requirements will be circulated for public comment and a copy will be sent to you for review.

I hope this letter addresses your concerns. If not, or if you have any other questions or further concerns regarding this matter, please call Mr. Jeff Pyle at (559) 445-5145. Regional Water Board staff intends to place the Initial Study and Negative Declaration on the uncontested agenda for consideration at the August 2007 Board meeting.



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cc: Mr. Steve King, SK Foods, Lemoore
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