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THE PACKAGE STORE

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Maria Meredith, Senior planner
 Santa Rosa City, etc.
 October 7, 1996

RE: SANTA ROSA WASTEWATER DISPOSAL EIR; COMMENTS ON PALEONTOLOGY SECTION

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| 1. | The relevant appendices were available only at 4 locations, one of which (SSU) required concerted effort to locate it. I question the decision to restrict access to particular portions of this EIR which is a publically funded project. | 001 |
| 2. | The paleontology portion is not in the final EIR at SSU (Appendix 15). Therefore, I assume it is missing from the other 3 published copies. Where is it? I am inclined to further assume it wasn't done. | 002 |
| 3. | 4.15 - 10 (last line): "...no goals, objectives and policies related to paleo... in project area..." Unless the Sonoma County General Plan was amended to specifically exclude paleontologic resources since the 1980's, I believe it is specifically addressed. If not it should be if only to be consistent with every other county in California. The Marin County General Plan as of at least ca. 1992 also specifically addressed paleo resources. Obviously, State and Federal requirements also exist if State or Federal monies are involved. The laws are quite specific for paleo resources. | 003 |
| 4a. | 4.15 - 13 (line 26): "...no known sites in project area..." This area includes at least the Wilson Grove Formation, Petaluma Formation, and/or the Glen Ellen Formation, all of which are paleontologically sensitive and all of which should be addressed on a stratigraphic, and not topographic or geographic basis. | 004 |
| 4b. | Also, invertebrate and plant fossils from the Wilson Grove Formation do "add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally.". These are significant because they are "individual specimens or assemblages which are unique, unusual, rare, uncommon, and diagnostically and stratigraphically important". | 005 |
| 4c. | Also, a qualified monitor should also recognize plants and invertebrates in terms of their potential importance. | 006 |
| 4d. | Also, mitigation for paleo resources, <u>ALL SECTIONS</u> : Microvertebrate testing should occur during assessment/mitigation. | 007 |
| 4e. | Also, standard requirements for paleo assessment, mitigation, and analysis are clearly outlined (Reynolds 1991). | 008 |
| 5a. | 4.15 - 10 (line 8): The Franciscan is fossiliferous, and also as mapped includes other fossiliferous formations (such as Great Valley sequence). For instance, see G.-Naidu 1978a, 1982b, 1991b, 1994a, 1994b. | 009 |
| 5b. | (Line 16). There are vertebrate fossils from many localities, which would have been recognized in the institutional collections review of a comprehensive paleo study, which apparently was not done for the EIR. Moreover, "...little | 010 |

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published information..." is irrelevant because a comprehensive paleo study would recognize unpublished localities. Paleontology is a research-oriented science; research is an ongoing phenomenon; consequently unpublished localities, taxonomic lists, or stratigraphic occurrences of paleo resources are the norm and not the exception. Clearly, that is a contributing reason for having a paleo sensitivity statement in the first place, since working professional paleontologists have access to required information. 010 (cont.)

5c. (Line 19): Birds in the Petaluma Formation? Probably an incorrect allusion to the Wilson Grove Formation, which contains 20+ species of fossil birds. (G.-Naidu in preparation, A). 011

5d. (Line 22): Sonoma Volcanics tuffs and ashes are fossiliferous, which is well documented in existing published literature, institutional collections, and even local tourist attractions (the Petrified Forest). Even were they not known to be fossiliferous, one would assume they could be, or probably were, thus requiring assessment and/or mitigation. 012

6. The paleo part of this EIR is at least partly incorrect. It is entirely insufficient in terms of establishing relative importance of local fossiliferous strata and consequently is probably insufficient in terms of analyzing paleontologic sensitivity. 013

A. Part of the problem apparently can be traced to the paleo component of the 1990 EIP study, which is cited repeatedly in the present 1996 EIR. Since paleo was apparently omitted from the present EIR, the following comments address the paleo component of the earlier EIP 1990 document, which I have recently reviewed:

7a. The earlier EIP paleo study was based largely on consultation with me, utilizing my unpublished baseline maps, unpublished comprehensive faunal lists, and my conclusions, based on my work therein since 1964, regarding paleo sensitivity of the Wilson Grove and Petaluma formations, as well as Sonoma Volcanics and "Franciscan complex". The published EIP 1990 paleo section is insufficient, partly incorrect, and largely inconsistent with my original personal (verbal) communications with the EIP paleo section author. 014

7b. EIP 1990, 12-19 and other sections: Proximity of discrete paleo sites and occurrences to proposed project sites is largely irrelevant in terms of establishing sensitivity, since paleo resources are assessed stratigraphically (in terms of specific rock units). 015

7c. EIP 1990, 12-16; 12-18: The summary of paleontologic resources is entirely insufficient and in part incorrect, as is the geologic and stratigraphic review. The diversity of the fauna/flora of the Wilson Grove Formation, as well as co-occurrence therein of invertebrate-vertebrate communities, is not adequately addressed and its potential importance in terms of West Coast geology/paleontology appears to have been completely ignored. 016

7d. EIP 1990, 12-17: Known paleontologic resources: This was insufficient and partly incorrect at the time of writing (1990); it is much more so insufficient and still partly incorrect currently (1996). 017

8. In view of inadequacies in the EIP 1990 paleo section, the current lack of updated, comprehensive, or interpretational paleo studies in the 1996 wastewater EIR constitutes a glaring oversight or omission. 018

Sincerely yours

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