
PUBLIC COMMENTOR 240 - BOB SMITHFIELD, SEPTEMBER 24, 1996

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I'm Bob Smithfield, P.O. Box 1113, Fairfax, California. I have six comments to make. Additional comments I'll make in writing.

Mayor Wright:

Thank you.

BOB SMITHFIELD:

First comment pertains to volume 1, 1-33. The Draft uses the word "estero" to refer to each of the estuaries of the Gulf of the Farallons National Marine Sanctuary. Although each estuary is in fact called by name estero, the word "estero" does not seem to be recognized or used by the public as another way of saying estuary. Therefore, estero may not convey the functional ecological meaning to the public as estuary does. For CEQA and NEPA purposes of adequately informing and facilitating the involvement of the public and public decision makers, it seems that two changes are appropriate.

First, whenever Estero Americano or Estero de San Antonio are used, the phrase "the estuary" should proceed them. Thus modified, the reader would read "the estuary Estero Americano" and "the estuary Estero de San Antonio." Second, wherever estero or the plural form or possessive form is used, estuary should be used instead.

My second comment is also on public participation in this process. When a reader seeks to investigate noise impacts of the project or components of the project, the Draft states there are no supporting documents produced. In fact, there is documentation of significant adverse public reaction and public concern about project components noise potential and impacts and substantial public question about whether or not land owners and/or occupants of property potentially cited for wastewater pumps and pump stations had ever been, or adequately been informed about the potential noise impacts of the pumps. The relevant documentation is in the draft summary feedback reports, Santa Rosa subregional long-term wastewater project EIR/EIS dated February 23rd, 1996 by the cover letter which accompanied that publication. The relevant dialogue is recorded under round table number 2, land use, transportation, public services, noise, air, energy, November 16th, 1995 appearing on pages 5 through 8.

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The level of public interest and the specificity of the concerns about expected pump station noise level, given those, it seems factually significant and legally necessary to include a thorough reporting and evaluation of these impacts and the public's stated interests and concerns about them.

Third comment, as regarding irrigation conservation management programs, in volume 1 and in volume 2, and sensitive biological resources conservation program and revegetation program discussed in Volume 1. It seems possible that during the life of the

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project and in later years political and economic circumstances in this region might change which would result in putting into jeopardy the funding for continuance of the ICMP'S, the sensitive biological resources conservation program and the revegetation programs. If the assessed reduction or elimination of funding for any and all of these programs occur, then it is likely that the monitoring and mitigation actions necessary to prevent or mitigate environmental impacts covered by them would be impaired.

The EIR/EIS needs to describe in what ways impairment of the operation of these programs is to be avoided or remedied in order to satisfy the need to present impacts -- the impacts avoidance, minimization, monitoring, mitigation schemes which adhere to the legal and regulatory guidelines.

Fourth comment, the attrition of irrigation land is mentioned in the EIR/EIS in volume 1 on 121. Here as well as elsewhere in the Draft -- excuse me -- here as well as elsewhere in the Draft in discussion of the ICMP'S there's no mention of continued impacts monitoring of the lands that move out of the program through attrition. And no mention of how natural resources adjacent to these lands will be monitored in years after the lands stop receiving the wastewater.

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It seems to be apparent that potential impacts from the use of treated wastewater could have a significant -- would persist following the attrition, making continuing monitoring both prudent and necessary. It also seems possible that soil management practices would affect these potential impacts for some time following the attrition of the lands from the program. So that ICMP'S and impacts monitoring should be developed and operated to include post-attrition practices, post-attrition monitoring and reporting. These should all be addressed in the EIR/EIS.

Fifth comment, regarding the --

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Mayor Wright:

You need to wrap up. Your five minutes is up.

BOT [sic] SMITHFIELD:

Okay. The ICMP -- let's see, Volume 2, Section 4.2, 6, 7, and 8 regarding the ICMP for agricultural irrigation components for the proposed project, significant impact questions are raised about the practical usefulness of both the trace elements loading criteria and Soil Erosion T Value Criteria.

Actual public and legal tolerance of trace elements loading of soils and soil erosion may not conform to these trace elements criteria and the USDA Soil Erosion T Value Criteria.

We all know that there are farms all over the united states that are -- that follow USDA practices where soil erosion continues at an unacceptable rate. So it would be appropriate

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for the Draft to incorporate more comprehensive data on the actual consequences of the ICMP'S which will adhere to these criteria.

Mayor Wright:

Thank you, Bob. Craig Lawson has left. Charlie Carson is going to make his comments for him.