



Sludge Alert - County Ordinance EIR / Scoping 11-12-15

David Broadwater to: mbandov

11/02/2015 09:32 AM

From: David Broadwater <csi@thegrid.net>

To: mbandov@co.slo.ca.us,

Follow Up: Normal Priority.

History: This message has been forwarded.

2 attachments



CSI - Extend Perm Ord EIR Scoping 10-30-15.pdf SLOCo Plann - Scoping NOI 10-31-15.pdf

Citizens of SLO County,
re: **Sewage Sludge Land Application - Permanent SLO County Ordinance Proposed**
ALERT: Short EIR Scoping Period Protested - Demand for Extension

The County has decided to propose a permanent ordinance permitting sewage sludge land application, and to initiate the CEQA/EIR process by severely limiting public and organizational input. The County Planning Department plans to issue a Notice of Preparation on 11-2-15, and to conduct a Scoping meeting nine weekdays later, on 11-12-15.

Scoping hearings are required by CEQA and designed to gather public input regarding the issues an EIR should examine. This schedule makes it extremely difficult for organizations to agendize this matter and formulate a response, and for individuals to submit suggestions, as well.

CSI opposes this schedule, and has written the Planning Department and Commission, Board of Supervisors, and the Environmental Health Division of the county Health Agency protesting it, and recommending an extension of the Scoping period to 11-30-15.

FYI - Attached to this email are CSI's letter and the Planning Department's Public Notice.

Some of you may be receiving the Planning Department's Notice of Preparation soon.

You may also object to this schedule and support the recommendation for an extension by writing to the county Planning Department. Suggested recipients:

James Caruso, Senior Planner - jcaruso@co.slo.ca.us

Ellen Carroll, Environmental Division Director - elcarroll@co.slo.ca.us

Planning Department - planning@co.slo.ca.us

Feel free to share copies of any such missives with CSI.

CSI will be preparing a document containing issues for EIR analysis over the next few days for submission during the scoping process. When completed, it will be shared with you.

My phone number is in the letterhead of the attached CSI letter. Feel free to call me if you'd like to discuss this matter.

David Broadwater

CSI

CSI letter:

Planning Dep't. Public Notice:

CSI: Center for Sludge Information

Advocacy through Acquisition, Analysis and Articulation of Information re:

Land Application of Sewage Sludge

6604 Portola Rd., Atascadero, Calif. 93422. ph# (805) 466-0352. Email: csi@thegrid.net

to: SLO County Planning & Building Department, & Environmental Division
SLO County Planning Commission,
SLO County Board of Supervisors,
Environmental Health Division of SLO County Health Agency.

date: 10-31-15

re: **Sewage Sludge Land Application Permanent Ordinance – NOP / EIR
/ Scoping Period**

SLO County is proposing a permanent ordinance permitting spreading sewage sludge on land. It's initiating a CEQA/EIR process by issuing an NOP and scheduling a Scoping meeting.

But, there is a very serious deficiency in the scheduling of this Scoping meeting. Due to the significance and immediacy of the matter, it must be corrected now. The numerous agencies, organizations and individuals involved indicate the depth of this matter. A solution is hereby presented.

Problem – Short Scoping Schedule:

- Less than 10 weekdays between issue of NOP (11-2-15) and Scoping meeting (11-12-15) = Unnecessary limitation of public and governmental agency input.

Because of the legal and ethical guidelines organizations follow, many will be unable to agendaize and deliberate on submitting issues for consideration in the EIR scoping by 11-12-15.

Given the historic involvement of various Advisory Councils, the SLO Co. Health Commission, Ag Liaison Board, Sierra Club, Farm Bureau, ECOSLO, NoCoWatch, Surfriders, etc.; Closing the scoping period only nine days after its opening is, effectively, prohibitive of public participation.

Solution – Extend Scoping Period:

To accommodate the participation of its advisory bodies, community organizations and individuals, extend the Scoping Period to one month, i.e. from 11-2-15 to 11-30-15. Let's give folks time to absorb information, discuss and deliberate policy, and submit some EIR issue recommendations.

Background

The following is a summary of information CSI has received to date.

CSI received (via 10-28-15 & 10-30-15 emails) notification that the Planning Department:

- is initiating a CEQA process to enact a permanent ordinance permitting the land application of sewage sludge,
- will issue a Notice of Preparation on 11-2-15, and

- will conduct a Scoping Meeting on the EIR during the evening of 11-12-15. CSI received (via a 10-30-15 email) a "Public Notice" (dated Saturday, 10-31-15) regarding the EIR Scoping Meeting (scheduled for 6:30 – 8:30 PM at the Palm Street County Library in SLO).

The "Public Notice" contains the parenthetical phrase "(see attachment 1 for the proposed ordinance)", but includes no such attachment. It remains impossible, therefore, for an interested party to evaluate the proposed/draft ordinance, although it obviously already exists.

Extend the scoping period. Allow all stakeholders to participate.

David Broadwater
CSI
Atascadero, Calif.



DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

PUBLIC NOTICE ENVIRONMENTAL IMPACT REPORT SCOPING MEETING

WHO: County of San Luis Obispo Department of Planning and Building

WHAT: An Environmental Impact Report (EIR) Scoping Meeting for the proposed Permanent Biosolids Ordinance. An EIR Scoping Meeting is an opportunity for agencies and interested members of the public to obtain information about the project and provide input on the issues that will be analyzed in the EIR.

Proposed Project

The proposed permanent biosolids ordinance will regulate the land application of biosolids on agriculturally designated property in the unincorporated area of the county (see attachment 1 for the proposed ordinance). Highlights of the proposed ordinance include:

- a. The draft ordinance is significantly more stringent than the existing federal, state and county land application regulations. Only "exceptional quality biosolids" or "exceptional quality composted biosolids" can be land applied in the county with significant regulations.
- b. Exceptional quality and exceptional quality composted biosolids (hereinafter referred to as "EQB" & "EQCB"), can only be applied to land zoned "agricultural" at the calculated agronomic rate for the intended ag use.
- c. Depending on receiver site constraints and the scope of a land application project, EHS may require submittal of an Erosion Control Plan, a Nutrient and Heavy Metals Management Plan, an Odor Management Plan, and a Water Quality Management Plan, with each plan designed to address a specific project and receiver site conditions.
- d. The total amount of EQB/EQCB that can be land applied on any one receiver site is limited to a maximum of ten (10) tons per acre over any three (3) year period, unless soil testing of pollutant concentrations for the receiver site show the land is capable of taking additional applications.

If you need more information about this project, please contact James Caruso at (805) 781-5702, or jcaruso@co.slo.ca.us.

WHEN: The meeting will be held Thursday, November 12, 2015 from 6:30 p.m. to 8:30 pm

WHERE: The location of the meeting will be at the San Luis Obispo Library Community Room (corner of Palm and Osos Streets).

DATED: October 31, 2015

MARTI FISHER
Environmental Administrative Assistant