



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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IN REPLY PLEASE

REFER TO FILE:

EP-5

October 10, 2012

Ms. Jeanine Townsend  
Clerk to the Board State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814-2828

Dear Ms. Townsend:

### COMMENTS ON THE DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR THE DISCHARGE OF WASTES AT COMPOST MANAGEMENT UNITS

The Los Angeles County Department of Public Works appreciates the opportunity to provide the following comments on the State Water Resources Control Board's (SWRCB) Draft Initial Study/Mitigated Negative Declaration, Statewide General Waste Discharge Requirements for the Discharge of Wastes at Compost Management Units:

- **6.4. BIOLOGICAL RESOURCES.** Paragraph d) should be marked as "less than significant impact" as there may be some impacts on the movement of any native resident and migratory fish or wildlife species or with established native resident or migratory corridor or impede the use of native wildlife nursery sites during the construction and operation of a CMU.
- **6.14. PUBLIC SERVICES.** Paragraph a) should be marked as "less than significant impact" as there may be some impacts on public fire protection service in term of maintaining acceptable fire service rations, response times, etc. do to the potential dangers associated with fire resulted from the spontaneous combustion of working piles in the CMU.
- **6.18. MANDATORY FINDINGS OF SIGNIFICANCE.** This section should address the implementation of the monitoring program and probable issues associated with it such as ponding water. There should be

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discussion on preventive measures to minimize the harboring and spreading of vectors and disease.

We appreciate you considering our comments and look forward to working with you in developing an effective Statewide order for composting facilities. If you have any questions, please contact Ms. Emiko Thompson at (626) 458-3521, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER  
Director of Public Works



 PAT PROANO  
Assistant Deputy Director  
Environmental Programs Division

WT:dy

P:\Sec\SWRCB IS MND Comment Ltr

cc: Secretary, CalEPA (Matt Rodriguez)  
Chair, State Water Resources Control Board (Charles Hoppin)  
State Water Resources Control Board (Thomas Howard, Lisa Babcock,  
Scott Couch, Roger Mitchell)  
CalRecycle (Caroll Mortensen, Mark Leary, Howard Levenson, Brenda Smyth,  
Ken Decio, Robert Holmes, Mark De Bie)  
California Air Resources Board (Mary Nichols)  
California Department of Food and Agriculture (Annete Whitford)  
Each Member of the Los Angeles County Integrated Waste Management Task  
Force