



Mape's Ranch and Lyons' Investments

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October 16, 2023

California State Water Resources Control Board
P.O. Box 100
Sacramento CA 95812

Sent via Email

Re: Support for the Renewal of the Low Threat Waiver of WDR's, RWD's, and/or WRR's in the Central Valley Region

Dear Members and Senior Staff of the Central Valley Water Board,

We are the owners/operators of a food processing by-product reuse land application site permit in Stanislaus County. We have been managing/operating the permitted site for over 30 years as a soil amendment program. The site is heavily monitored and inspected on a weekly basis during the season by Senior Stanislaus County Staff, with a comprehensive report compiled and due annually. The report covers such items as by-product type, number of truckloads delivered, moisture content, and third-party State of California licensed lab analysis. With over 30 years of operational and management experience, the site has never received a formal complaint or violation from Stanislaus County.

The service we provide provides a tremendous cost effective and environmentally friendly alternative to dumping the food processing by-product in the Stanislaus County landfill. The management and incorporation of the natural food by-product into the farming soils provides organic matter that benefits the soil structure and food production. The by-product is spread over hundreds of acres annually and is dried by sunlight and then incorporated into the soil. Our site and the Stanislaus County Food Processing By-Product Reuse Program should be used as a model throughout the State of California.

We strongly urge the California State Water Resources Control Board to renew the Low Threat Waiver for this type of program.

Sincerely,

William (Bill) J. Lyons, Jr.

Cc: Stanislaus County DER
Stanislaus County Food Processing By-Product Reuse Committee