

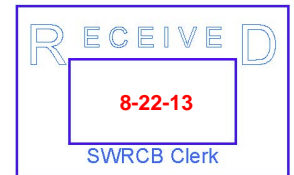


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NCL-13-035

August 21, 2013

Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, California 95814



SUBJECT: Notice of Preparation, Notice of Public Scoping Meeting Environmental Impact Report for the General Waste Discharge Requirements for Composting Operations for the State Water Resources Control Board

Dear Ms. Townsend:

The County of Orange has reviewed, Notice of Preparation, Notice of Public Scoping Meeting Environmental Impact Report for the General Waste Discharge Requirements for Composting Operations and offers the following comments:

Environmental Resources:

1. The EIR for the proposed regulations should examine the hydrologic impacts to sites in rural areas that are direct consequences of compliance. For example, larger sites would be required to have engineered 25-year storm retention ponds, pad working surfaces, and drainage ditches, even if the entire site is at present bare ground. Where the property ends, new engineered drainage ditches could then be discharging concentrated flows into earthen channels, increasing the likelihood of erosion at those points and immediately downstream.
2. The EIR for the proposed regulations may itself have to supply a precise definition of "surface water(s)," to fully examine impacts of facility minimum distances to surface waters. The proposed Order's regulatory text speaks of, "surface waters or surface water drainage course(s)," and "surface water bodies, including streams, ditches, canals, and other natural drainage courses." These are three different water bodies with different meanings. The EIR must determine which of the water bodies to examine its impacts instead of using them interchangeably.

If you have any questions or need clarification, please do not hesitate to call me at (714) 667-3211.

Sincerely,



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