



May 31, 2024

Alex Hernandez, Deputy Director
Kings County Community Development Agency
1400 W. Lacey Blvd. Bldg 6
Hanford, CA 93230
alex.hernandez@co.kings.ca.us

Subject: SCH No. 2024041297 – Draft Initial Study and Mitigated Negative Declaration
for Thomas Bros. Composting Facility (Conditional Use Permit No. 22-06)

Dear Alex Hernandez,

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The Kings County Community Development Agency, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The project location is described in the Draft IS/MND as follows: The proposed Project is in a rural unincorporated area of Kings County, just south of the Fresno County/Kings County border. The nearest community is Riverdale, approximately 2 miles northwest. The Site is on the southwest corner of W Excelsior Avenue and 20th Avenue. The Project Site is approximately 63.22 acres on APN 004-062-003. The Site is topographically flat and surrounded by agricultural uses and some residences. The agricultural uses to the south, east, and west are a part of Kings County, zoned as General Agriculture – 20 Acre Minimum (AG-20). The agricultural uses to the north are a part of Fresno County, designated as Exclusive Agriculture – 20 Acre minimum (AE-20). Kings County designates the Site as General Agriculture – 20 Acre Minimum and under agricultural use. The existing structures on the Site include shade structures, a hay barn, a pole barn, a milk barn, loafing barn, and one residence.

The Project would establish a composting facility on approximately 63.22 acres that would receive 70,000 tons of wet manure annually. The compost produced would be

sold to local farms. The Project would also construct a private truck washout and a retention pond.

Operations would occur Monday through Saturday. Operating hours for the composting site would be 6:00a.m. to 6:00 p.m. Operating hours for the truck wash would be 8:00a.m. to 8:00p.m. Maximum daily combined truck trips for the composting facility and truck wash are estimated to be 50 trucks per day.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Section 1.9, Page 3-5

This site will likely be regulated as an agricultural material composting operation ([Title 14 CCR Section 17856](#)) as determined by the solid waste Local Enforcement Agency (LEA). Odor Impact Minimization Plans (OIMP) are not required for agricultural material composting operations unless the LEA determines the site has caused odor impact violations. This does not preclude the site from submitting an OIMP ([Title 14 CCR Section 17863.4](#)) should they wish to add this as an additional odor mitigation measure.

Section 2.3, Page 3-11

The site will likely fall under the oversight of the Solid Waste Local Enforcement Agency (Kings County Department of Public Health, Environmental Health Division).

Solid Waste Regulatory Oversight

The Kings County Department of Public Health, Environmental Health Division is the Local Enforcement Agency (LEA) for Kings County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact Troy Hommerding at (559) 584-1411 to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

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If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6119 or by e-mail at Harprit.Mattu@calrecycle.ca.gov.

Sincerely,

Harprit Mattu, REHS, Environmental Scientist
Permitting & Assistance Branch – North
Waste Permitting, Compliance & Mitigation Division
CalRecycle