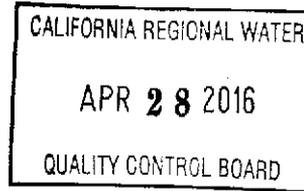


**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**



April 26, 2016

**Laurie Taul**  
California Regional Water Quality Control Board  
San Francisco Bay Region  
151 Clay Street, Suite 400  
Oakland, CA 94612

**ALAMEDA COUNTY**  
Tom Bates  
Margaret Fujioka  
Scott Haggerty  
Nate Miley

**CONTRA COSTA COUNTY**  
John Gioia  
David Hudson  
(Secretary)  
Karen Mitchoff  
Mark Ross

**MARIN COUNTY**  
Katie Rice

**NAPA COUNTY**  
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Edwin M. Lee  
Eric Mar  
(Chair)

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David J. Canepa  
Carole Groom  
Warren Slocum

**SANTA CLARA COUNTY**  
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(Vice-Chair)  
Jan Pepper  
Rod G. Sinks

**SOLANO COUNTY**  
James Spering  
Osby Davis

**SONOMA COUNTY**  
Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

**Subject: Initial Study and Mitigated Negative Declaration (IS/MND) for the Adoption and Implementation of General Waste Discharge Requirements (General WDRs) for Confined Animal Facilities including the Re-opening of an Existing Dormant Facility (Project)**

Dear Ms. Taul:

Bay Area Air Quality Management District (Air District) staff has reviewed the California Regional Water Quality Control Board's IS/MND prepared for the Project. The Project consists of the San Francisco Bay Regional Water Quality Control Board establishing General WDRs for the management of process water, manure, and other organic materials at confined animal facilities (CAFs), including the application of such materials to land. The General WDRs may be used to regulate currently operating CAFs and any dairies that may reopen within the footprint of a former dairy operation within the San Francisco Bay region.

Air District staff recommends that the IS/MND state that CAFs are regulated by Air District Regulation 2, Rule 10, and that CAFs may require Air District permits, per Air District Regulation 2, Rule 1.

Air District rules and regulations can be found on our webpage at <http://www.baaqmd.gov/rules-and-compliance/current-rules>. Air District staff is available to assist the California Regional Water Quality Control Board to address these comments. If you have any questions, please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov).

Sincerely,

  
Jean Roggenkamp  
Deputy Executive Officer