



December 6, 2016

Robin Kerns  
City of Commerce City  
Community Development Department  
7887 East 60<sup>th</sup> Avenue  
Commerce City, CO 80022

RE: PUD Concept Schematic for 6525 Olive St  
Z-940-16  
TCHD Case No. 4168

Dear Mr. Kerns:

Thank you for the opportunity to review and comment on the proposed Planned Unit Development (PUD) Concept Schematic to allow an accessory dwelling unit and urban farm located at 6525 Olive Street. Tri-County Health Department (TCHD) staff has reviewed the application for compliance with applicable environmental and public health regulations. After reviewing the application, TCHD has the following comments.

### **Local Food Production and Access to Healthy Food Options**

Because chronic diseases related to physical inactivity and obesity now rank among the country's greatest public health risks, TCHD encourages community designs that make it easy for people to include regular physical activity and increase the consumption of healthy food into their daily activities. TCHD commends the applicant for considering how to bring local farming to the community and encourages the applicant to seek opportunities to make produce grown onsite available to the surrounding community.

### **Animal Slaughter and Meat Processing**

Processing of animal slaughter and meat can bring health risks to people exposed to the animals and to people who consume the meat. It was not clear from the application materials who will consume the meat processed at the facility. The Colorado Department of Agriculture Custom Meat Processor Program regulates facilities that process meat. The Custom Meat Processor Program regulates domestic and wild game meat processing facilities that process animals for consumption by the owner of the animal, their family and non-paying guests. Facilities are inspected for proper sanitation, labeling, recordkeeping, compliance with USDA BSE regulations and verification that uninspected meat is not sold for human consumption. There may be some exemptions for the processing of small animals. TCHD recommends the applicant contact Steve Blunt, Meat Program Manager at the Colorado Department of Agriculture at (303) 867-9237. Additional Information can be found at <http://www.colorado.gov/ag>.

The General Notes in the PUD application mentions that offal from animal processing will not be composted or buried on site; however, it does mention that offal may be processed with utilizing an anaerobic digestion process.

Due to health and safety issues, and the potential for nuisance conditions, TCHD does not support the use of anaerobic digestion of this waste stream. We recommend that offal and other animal processing waste, e.g. feathers, always be disposed of by bagging and placement into an on-site dumpster with a fly-tight cover that is regularly serviced by the waste-hauling contractor.

### **Livestock Boarding Facilities**

Livestock washdown water shall be managed to avoid nuisance conditions and contamination of surface and groundwater. Nuisance conditions may include soil erosion, fly, odor, and mosquito problems associated with stagnant water. Also, to prevent human exposures to West Nile Virus and other mosquito-borne diseases, the applicant should not allow water to pond or stagnate on the site, as these conditions support mosquito breeding. The applicant should eliminate mosquito breeding areas from livestock pens by keeping water in troughs or by using dunks, (pellets of bacteria) that are non-toxic to animals, but that kill mosquito and fly larvae that are developing in water.

The application indicates that manure will be picked up daily and placed in compost bins designed for manure. We commend the applicant for planning for manure management and encourage the applicant to create a manure management plan that outlines the methods and practices for managing this aspect of the farming activities in a manner that does not create a nuisance. .

The application indicates that an anaerobic digestion process may be used for manure. Due to health and safety issues, and the potential for nuisance conditions, TCHD does not support the use of anaerobic digestion of this waste stream.

Liquid wastes (urine or washdown water) shall not be discharged into any on-site drainages, irrigation ditches or ponds. Washdown waters must be discharged in a way that does not create nuisance conditions or impact water quality. We recommend that “dry” methods, such as sweeping and shoveling, be used as much as possible to clean stalls.

### **Wastewater – On-Site Wastewater System Abandonment**

Under “Use and Scope of Project” in the Operations Narrative Letter, the application states that a septic system was installed around 1980. TCHD’s has no record of the “septic system” or On-Site Wastewater Treatment System (OWTS) being permitted for the subject property and no notification of abandonment . The existing OWTS shall be abandoned in accordance with Regulation No. O-14, Section 11.3. TCHD must be notified in writing once the system has been properly abandoned. For more information, or to submit the notification, the applicant may contact the TCHD’s Commerce City Office at (303)288-6816. More information is available at

<http://www.tchd.org/269/Septic-Systems>.

Please feel free to contact me at (720) 200-1571 or email at [slynch@tchd.org](mailto:slynch@tchd.org) if you have any questions on TCHD's comments.

Sincerely,

A handwritten signature in black ink, reading "Sheila Lynch". The signature is fluid and cursive, with the first name "Sheila" and last name "Lynch" clearly distinguishable.

Sheila Lynch  
Land Use Program Coordinator

CC: Monte Deatrich, TCHD