

To: Ken Decio
Waste Permitting, Compliance, and Mitigation Division
California Department of Resources Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812-4025

July 14, 2015

Re: Additional 15-Day Comment Period/ Response to CalRecycle's Proposed Title 14 Composting Regulations

Dear Mr. Decio,

Throughout this rulemaking process and in our previous informal and formal comment letters, we specifically requested that CalRecycle allow on-farm projects to compost a small volume of off-site material as necessary to their ongoing on-farm composting, and per discretion and approval of the LEA. In its latest draft of proposed regulations, CalRecycle clarified in SS17855 (4) that composting of any combination of material is exempt so long as it fits within the 100 cy/ 750 sf limit. We are disappointed with this particular modification, as it still does not provide farms a means to participate in California's mandated organic recycling initiatives. An intermediate step is still missing.

San Diego County is home to more than 6,500 small family farms scattered throughout our urban and rural areas, many of which can feasibly accept small volumes of offsite material from their immediate neighbors to support their growing needs and our sustainability efforts. While the proposed exemption will suit micro-projects well, we have experienced cases where the on-farm composting operation exceeds this particular exemption. We have already reached regulatory resistance, demonstrating that the State regulations hurt our efforts to utilize our farmlands. The proposed regulations will not help.

We have no reason to believe that farms composting a minor volume of offsite material will pose a greater threat to public health or the environment to the extent that they would require a Registration or Full Solid Waste Facility Permit. An EA Notification would be a feasible middle ground. We provided examples of success stories in other states demonstrating successful projects. We recommended education and training programs to give CalRecycle and LEAs assurance that projects will be beneficial. We are disappointed that the composting regulations continue to incentivize development of large, centralized facilities out of convenience of regulation. California is too large and diverse a state for this one-size-fits-all approach.

We ask CalRecycle to explain why it has taken this position.

Thank-you for this opportunity to comment and look forward to working with CalRecycle and our local jurisdictions as the new regulations are implemented.

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