



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 · PHONE (916) 446-4647

May 6, 2015

Mr. Ken Decio
Waste Permitting, Compliance, and Mitigation Division
California Department of Resources Recycling and Recovery
P.O.Box4025
Sacramento, CA 95812-4025

RE: Proposed Regulation Text, Compostable Materials, Transfer/Processing

Dear Mr. Decio:

The California Farm Bureau Federation would like to thank you for addressing our concerns regarding the definition of Land Application in Section 17852 (a) (24.5). We believe the resolution you have proposed will provide the flexibility to those farmers and ranchers who want to apply compostable materials more than once a year for soil fertility and weed suppression. Using the land use zoning designation will insure your goal of keeping unscrupulous or absentee land owners from dumping large amounts of compostable materials that can become a nuisance for all those who live in rural areas, especially the agricultural community.

We also appreciate the change of 0.1% physical containments to 0.5%. It will be important to have standardized and repeatable lab protocol to meet this more reasonable containment level to insure the health and environmental goals of the regulation can be achieved by the composting industry.

We understand the California League of Food Processors, Dairy Cares and Agricultural Council have expressed specific amendments. We believe their requests are realistic and practical and urge you to adopt their recommendations. The premise of their requests is to insure CalRecycle does not add another layer of regulation where there is already adequate environmental oversight from another authority. This type of cooperative spirit will be important as we implement the Healthy Soils Initiative being actively developed by the Brown Administration. This initiative will require multiple agencies, including CalRecycle, to work together in a streamlined and non-duplicative regulatory manner to insure agricultural soils have adequate soil organic matter to meet the challenges we are facing from increasingly variable precipitation and temperatures.

Farm Bureau looks forward to working with CalRecycle and other key state departments and agencies to explore various approaches that help create the long term sustainability of our soil system. We must continue to find ways to increase crop yields that will sustain a growing world population despite being in a serious drought.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia L. Cory".

Cynthia L. Cory
Director, Environmental Affairs

cc: Jennifer Lester Moffitt, CDFA