

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

May 6, 2015

Re: Importance of Small-Scale, Community Composting and 15-Day Comment Period/ Response to CalRecycle's Proposed Title 14 Composting Regulations

Dear Mr. Decio,

In San Diego County, we are encouraged by the proposed changes to composting regulations. Thank you for listening to our concerns and incorporating much of our input.

Overview of the San Diego Environment

- San Diego County is in a particularly difficult situation without composting facilities permitted for food scraps to support the vast majority of the region. The nearest facility that will openly accept much of our food scrap is over 100 miles away.
- San Diego compost, community garden, and local food advocates value composting as necessary for sustainable food production and responsible management of natural resources. Interest in decentralized composting is increasing nationwide, and is continuously being recognized as an important component of a community's sustainability efforts.
- While AB 1826 will require businesses to recycle their organic materials starting in 2016, San Diego does not have the infrastructure necessary to support composting at centralized facilities. Permitted large-scale facilities will take years to develop and build, while small compost sites will be able to respond rapidly to businesses needing outlets to compost their organic materials. Urban farms and community gardens are in desperate need for low cost sources of the organic matter and nutrients found in compost.
- San Diego County's 19 jurisdictions must support composting in local land-use and zoning rules. Current land-use rules are vague, vary by jurisdiction, and some are outright prohibitive, even for small sites. In addition, franchise agreements with waste haulers may limit options businesses have for composting their organic materials.

Response to CalRecycle's Proposed Composting Regulations

We are excited that the new rules will expand small-scale, community composting for California. We feel that the proposed 750-square foot footprint could be small for some compost techniques, however, especially those that utilize flatter, wider piles commonly preferred in biodynamic farming. However, we will support CalRecycle's proposal moving forward, so long as it is understood that the footprint encompasses the dimensions of only the feedstock and compost piles, and does not include other areas such as aisles and work sheds.

We understand that CalRecycle is doing the best to balance the diverse and complicated nature of our State. We feel that, no matter how complex and confusing the actual text of the regulations, the spirit of the regulations is to protect the public health and minimize or prevent negative impacts to the local community. Keeping the

spirit of the regulations in mind, we ask that CalRecycle encourage LEAs to collaborate with their jurisdictions and be flexible in helping create projects that meet both the interest and unique needs of the community.

For example, we have identified a couple of scenarios that could pose problematic for farms seeking to participate in their communities' waste diversion strategies, particularly those farms with composting operations clearly larger than the 100 cy/ 750 sf permit exemption.

- A farmer backhauling the collective of spoiled produce from a farmers market back to their own farm for composting.
- A farmer who distributes directly to restaurants or small markets and backhauls spoils and trimmings to composting.

In our previous comment letters, we specifically asked that farms be allotted a small, accessory allowance for offsite material such as food. Let's not shut farms out the conversation, they shouldn't be required to enroll in a Registration or Full permit for accepting small volumes of offsite material. And farms theoretically could maintain a 100 cubic yard "excluded" pile, in addition to their ongoing agricultural composting.

We ask CalRecycle to add specific language to the exclusion to allow farms to compost a small volume of offsite material as part of its agricultural composting per discretion and approval of the LEA.

Finally, we continue to advocate for, and request that CalRecycle provide guidance and support to projects seeking education and training. Projects with some level of training will give assurance to LEAs and local leaders that the project will be properly managed.

We sincerely appreciate this opportunity to comment and look forward to working with you as the new regulations are implemented.

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