



August 10, 2015

Michael Wetzel
High Desert Government Center
15900 Smoke Tree Street
Hesperia, CA 92345

RE: San Bernardino County Biosolids Ordinance

Dear Mr. Wetzel:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to submit comments on the draft revised biosolids ordinance for San Bernardino County. SCAP represents 83 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as reusable biosolids, recycled water, and renewable energy.

SCAP appreciates San Bernardino County's efforts to revise its ordinance and to allow for the potential of increased biosolids recycling in the unincorporated parts of the County. Biosolids recycling to agricultural and other lands is a time proven practice that increases organic matter and improves soil health, increases crop production and yield, reduces the need to irrigate, sequesters carbon long-term in the soil, and reduces or eliminates the need to use fossil fuel based inorganic fertilizer. Biosolids recycling is also supported by the Statewide General Order No. 2004-0012-DWQ (GO) for land application issued by the State Water Boards along with a Programmatic Environmental Impact Report in 2004. Earlier this year Governor Brown introduced the Healthy Soils Initiative to ensure California soils will support production agriculture for future generations of Californians. The Initiative is being implemented by the California Department of Food and Agriculture. As the state works toward returning to 1990 levels of carbon dioxide equivalent emissions to mitigate climate change impacts, there is increased recognition of the importance of sequestering carbon in the soil and reduced dependence on fossil fuel. Furthermore, the state has adopted a legislative goal to recycle 75% of the solid waste generated in the state by 2020. Recycling of all biosolids help achieve these goals and are supported in policy and regulation across the state. Two national academies of

P.O. Box 231565

Encinitas, CA 92024-1565

Fax: 760-479-4881 Tel: 760-479-4880 Website: www.scap1.org Email: info@scap1.org

science reports have supported the federal regulations for the land application of biosolids along with decades of research at universities across the globe.

SCAP has been working closely with the California Association of Sanitation Agencies (CASA) to promote the beneficial uses of biosolids throughout the state and fully support the following requests made by CASA for several modifications to the draft ordinance in support of everything outlined above:

1. The allowance for the land application of Class B biosolids as stipulated in both federal (40CFR503) and state (GO) regulations. In fact the California State Water Boards in adopting the statewide GO and PEIR state that the land application of Class B biosolids is the highest and most beneficial use option available for the management of biosolids; and
2. The allowance for use of biosolids for the reclamation of fire ravaged land, superfund mine sites, overgrazed rangeland, and brownfields. Such reclamation has been shown to be exceedingly successful and is supported at both the state and federal levels. It often requires a one-time application at rates higher than the agronomic rate and would thus be prohibited by the ordinance. However, extensive research across the nation and within California have documented the benefits of such reclamation projects and can be tremendous assets to California.
3. The allowance of Class A Exceptional Quality biosolids such as compost or heat dried pellets for use in landscaping, golf courses, home use, and other beneficial practices as provided for in part 503 without the restrictions outlined in the draft ordinance. Such restrictions seem intended for bulk application on agricultural land, but as written would seem to apply to all practices. Clarification is therefore requested, and provisions articulated to exclude uses described above.
4. Definitions are not consistent with state or federal law in several cases and should be revised accordingly.

Thank you very much for your consideration of these requests and please feel free to contact me with any questions or for more information at jpastore@scap1.org or at 760-479-4121.

Sincerely,

A handwritten signature in black ink that reads "John Pastore". The signature is written in a cursive, flowing style.

John Pastore, Executive Director