



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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December 11, 2009

Chair Sarah Christie and Commissioners
San Luis Obispo County Planning Commission
c/o Ramona Hedges
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Dear Chair Christie and Commissioners:

REQUEST TO REMOVE BIOSOLIDS POLICY LANGUAGE FROM CONSERVATION AND OPEN SPACE ELEMENT

I appreciate the opportunity to provide comments on this issue and do so on behalf of the California Association of Sanitation Agencies (CASA). CASA represents more than ninety percent of the sewered population of California and has long advocated for proactive and sustainable solutions for wastewater treatment, reclaimed water, and biosolids management. I am the Biosolids Program Manager for CASA and a civil and environmental engineer by training. I served on the National Academy of Sciences Committee that evaluated the federal biosolids regulations, releasing a report in 2002.

In the draft Conservation and Open Space Element (COSE) that you are considering on December 17 the following language is included, "The County should prohibit disposal of biosolids on open space lands." Your staff recently proposed this policy change in response to one commenter, but it is important to point out that no scientific evidence was provided to support the commenter's allegations. Scientific research at universities across the nation and around the world has documented for decades the safety and benefits of applying biosolids to land. Biosolids application should not be prohibited, but recognized as an example of an environmentally sound and economically prudent recycling program. Each year 750,000 dry metric tons of biosolids are produced in California and approximately 65% percent is beneficially applied to land. Not only is soil quality enhanced and crop production improved, but carbon is sequestered in the soil and fossil fuel is conserved by not producing as much inorganic fertilizer. San Luis Obispo County cities could also greatly reduce truck trips and fuel consumption by not exporting biosolids to neighboring counties, along with preserving scarce landfill capacity. In general, local application provides net benefits for climate change mitigation and helps to achieve the green house gas emission reduction mandates of the Global Warming Reduction Act of 2006 (AB 32).

Most San Luis Obispo County cities and wastewater agencies already currently truck biosolids out of the County for management. As the population increases, the amount of biosolids generated in San Luis Obispo County will also increase, and CASA is concerned that a prohibition such as the one under consideration would be short-sighted with respect to your county's ability to meet its future environmental and financial needs. Biosolids application within the county would provide a local governance solution with long-term viability. In response to any

To: Chair Christie and Commissioners

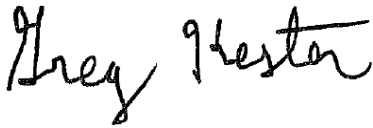
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public health concerns, it should be noted that Biosolids treatment and application is closely regulated by the U.S. Environmental Protection Agency and State Water Resources Control Board.

CASA believes that prohibiting biosolids application on open space lands would not be good environmental policy, and requests you remove this policy language (Policy OS 2.4) from the COSE prior to submittal to the Board of Supervisors. CASA would be pleased to work with you and provide further information if desired.

Sincerely,

A handwritten signature in black ink that reads "Greg Kester". The signature is written in a cursive style with a large initial "G".

Greg Kester
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