February 17, 2016

Amrith Gunasekara
Science Advisor to the Secretary
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Subject: Agronomic rates of compost application for California croplands and rangelands to support a CDFA Healthy Soils Incentives Program

Dear Dr. Gunasekara:

The California Association of Sanitation Agencies (CASA) respectfully submits comments on the draft white paper establishing application rates for compost on croplands and rangeland. We understand the announced deadline for submitting comments has passed, but request that our input be considered as part of the ongoing dialogue to implement the Healthy Soils Initiative.

CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, maximizing beneficial use of biosolids, generating renewable energy, and producing other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. CASA members are actively engaged as partners with the state to fulfill a number of mandates and initiatives intended to mitigate climate change impacts. These include: (1) providing 50% of the state’s energy needs from renewable sources; (2) reducing carbon dioxide equivalent emissions to 1990 levels; (3) reducing the carbon intensity of transportation fuel used in the state by 10%; (4) recycling 75% of the solid waste generated in the state; (5) reducing the release of short lived climate pollutants; and (6) advancing the objectives of the Healthy Soils Initiative through the recycling of biosolids to agricultural land.

CASA fully supports the creation of financial incentives to expand the use of compost and other organic soil amendments in support of the Healthy Soils Initiative. We do have several questions and comments relative to the proposed application rates for compost on cropland and rangeland in California. They include:

1. Are the recommended application rates advisory or mandatory?
2. Will the application rates apply to biosolids compost?
3. Why are the application rates limited to 15% of the nitrogen need of the crop grown? Is it expected that synthetic fertilizer will be applied in order to make up the deficiency? If so, why not follow the biosolids model and allow for application of compost up to the nitrogen need of the crop to be grown?
4. Is there no concern about high C:N ratio compost which may cause short term nitrogen deficiency in crops?

5. Why are rates so limited for rangeland? There is much work from Utah, Colorado and elsewhere documenting the benefits of biosolids to overgrazed rangeland and it would appear that California could also benefit from such application.

We very much look forward to continued proactive work with CDFA on this and other issues related to the Healthy Soils Initiative. Please contact me at gkester@casaweb.org or at 916-844-5262 with any response or for further clarification.

Sincerely,

Greg Kester
Director of Renewable Resource Programs

cc: Secretary Karen Ross – CDFA
    Deputy Secretary Jenny Lester Moffitt – CDFA
    Bobbi Larson – Executive Director CASA
    Howard Levenson - CalRecycle