August 13, 2015

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

Subject: San Bernardino County Biosolids Ordinance

Dear Mr. Wetzel:

The California Association of Sanitation Agencies (CASA) is pleased to submit comments on the recently released draft revised biosolids ordinance for San Bernardino County. CASA is a statewide association of municipalities, special districts, and joint powers agencies that represent more than ninety percent (90%) of the sewered population of California, including several in San Bernardino County. CASA has long been a proactive leader on wastewater treatment, biosolids management, recycled water, air quality, renewable energy, and climate change mitigation issues.

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

CASA requests 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

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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.

Clarification of these issues is respectfully requested and CASA stands ready to assist in any
way the County would desire, which could include: assisting with language revisions, the
development of requirements or standards, providing data on research and the science to
support such practices, and we would be happy to answer any questions or to provide further
clarification as appropriate.

Thank you very much for your consideration of these requests and please don’t hesitate to
contact me with any questions or for more information at gkester@casaweb.org or 916-844-
5262.

Sincerely,

Greg Kester
Director of Renewable Resource Programs

cc: Scott Couch – State Water Resources Control Board
Johnny Gonzales – State Water Resources Control Board
Lauren Fondahl – US Environmental Protection Agency Region 9