



SF Environment

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A Department of the City and County of San Francisco

Public Comment
Compost Order MND
Deadline: 10/10/12 by 12 noon



EDWIN M. LEE
Mayor

MELANIE NUTTER
Director

October 10, 2012

Via Email (commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Comment Letter – Compost Order CEQA Draft Initial Study/Mitigated Negative Declaration

Dear Ms. Townsend:

The San Francisco Department of Environment appreciates this opportunity to submit comments on the draft Initial Study and Negative Declaration prepared by the State Water Resources Control Board in connection with the proposed adoption of General Waste Discharge Requirements for the Discharges of Wastes at Compost Management Units. The Department is concerned that the State Board has not adequately evaluated the negative effects of the proposed WDR's on the City's extensive food scrap and yard trimmings composting program that would result from the greatly increased regulatory costs that the WDRs would impose.

This could effectively price composting out of consideration or reduce the number of approved compost facilities, either way, forcing organics into landfills.

Just last week, the City of San Francisco announced that it has achieved an 80% diversion rate. The composting of organics is an integral part of that success.

Specifically, the Initial Study does not evaluate the effects of the WDRs in diverting organic materials from the City that are currently sent to composting facilities to disposal in a landfill instead. Compared with composting these organic materials, landfill disposal would increase methane emissions and hence greenhouse gases. In addition, the decreased use of composted materials in agricultural operations, and the resulting increase in pesticide and irrigation water use, could lead to significant environmental impacts, including impacts to air quality, climate change, water quality, and water supply.

The State Board should not rely on a Negative Declaration, and it should instead prepare a full Environmental Impact Report.

Kevin Drew
Residential and Special Projects Zero Waste Coordinator

Cc: Bart Broome, San Francisco Public Utilities Commission