

2/26/2015



RE: Comments on State Water Resources Control Board Draft Order WQ 2015-XXXX-DWQ

As a compost producer in San Diego County, we would urge the State Water Resources Control Board to delay the implementation of the General Order until such a time that a set of rules better suited to the unique geologic and meteorological histories of each Regional Water Quality Control Board be put forth for consideration. Regional Water Boards were established specifically because of these very real differences in climate, weather and geology, so it becomes apparent that a “one size fits all” type of General Order is poorly thought-out, impractical, and unfair to an industry that facilitates water conservation and quality.

The 30-year average precipitation for Marin County, for example, is completely different from San Diego County. The climate and geology of these counties vary considerably. The General Order reads more like mitigation for a Northern California climate/weather region than it does for a semi-arid SoCal region.

We encourage the State Water Board to work with the Regional Water Boards to develop common sense, region appropriate rules and standard operating practices that will not discourage new entries into the future compost producing market, nor make undue capital expenditures required of small producers that drain the motivation to compete as the financial requirement to participate is not only prohibitive, but geographically unnecessary. Based on a 30-year average, precipitation in San Diego is approximately 10” per year, yet under the current proposed rulemaking, our business will be forced to finance the design and installation of a massive detention pond with a pan lysimeter. The size and scope of such a project is completely unnecessary for an operation of our size, and would be financially burdensome in both capital and operation and maintenance costs.

We appreciate the efforts of the State Water Board to bring about a set of guidelines that will ensure proper stewardship of the lands on which compost producers assist the state in meeting its future recycling goals for the benefit of its citizens and the continued health and viability of its native soil. But we must oppose the General Order for being too broad in scope and for lacking solutions that are appropriate to each region in favor of an overly simplistic model that will eventually, and unfortunately, prove to be a detriment to all the wonderful work that has been accomplished up to this point.

Respectfully,

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