



**SF Environment**

**Our home. Our city. Our planet.**

A Department of the City and County of San Francisco



Edwin M. Lee

Mayor

Deborah O. Raphael  
Director

December 5, 2014

Mr. Ken Decio  
Senior Integrated Waste Management Specialist  
Department of Resources Recycling and Recovery  
1001 "I" Street  
PO Box 4025  
Sacramento, CA 95812-4025

**Re. CalRecycle Draft Regulatory Revisions to Title 14 and 27 Regarding Compostable Materials Handling and Transfer/Processing**

Dear Ken:

I am writing to express my interest and attention to the regulatory revisions process underway. I believe we need to create a fast-track for organics processing and utilization in order to stimulate the most rapid expansion of compost production and utilization possible. This is crucial to an immediate response to catastrophic climate change.

I coordinate San Francisco's residential zero waste program including the collection of source separated organics. This program has been in operation for over 15 years and, combined with the commercial program, is currently capturing 750 tons of organics per day.

The preponderance of the material is food, as yards are small to non-existent in San Francisco. Working closely with Recology our service provider and partner in developing the collection and processing, we have been able to provide feedstock for the fine line of compost products crafted at the Jepson Prairie Organics facility.

As a pioneer in handling organics, our program overcame many obstacles and broke new ground to build a successful program. We embraced BPI certified compostable bags and foodware early on to encourage participation. We took early action to eliminate plastic bags from our discard stream to reduce contamination. We have recently reached full coverage of all residential and commercial users, including over 8,500 apartment buildings and 20,000 businesses. Each of these were/are works in progress, reaching for the best, stepping off the edge, but always recognizing the need for reevaluation and course correction.

We are now fixated on achieving zero organic waste to landfill in all of our sectors and zero contamination in our organics streams. We seek to capture the cleanest feedstock in order to make the cleanest finished product, and we will also "squeeze" every living bit of organics out of our discards as well.

Getting the regulatory framework right for organics on collection, processing and utilization statewide is hugely important for San Francisco to accomplish these goals and for the state with its goals as well. Indeed, I believe it is critical to the health of our planet's climate and our very future.

Recent scientific research, spearheaded by the Marin Carbon Project with Lawrence Berkeley National Labs and UC Berkeley, and building upon work across the state, country and world, indicates, what many have known or "felt in our bones", forever - that soil - healthy, moist, active soil, is the most effective carbon sponge on earth. Compost applied to rangeland can excites, enhances, honors our soil, and as a result, sequesters 2 to 5 times more carbon than untreated soil. This one-time compost treatment also results in ongoing annual increase in water holding capacity and increased forage production. The carbon sequestration also continues annually, for at least 20-30 years, from one compost application.

Compost is the natural accelerant to the soil carbon cycle, and that is one of the most promising keys to absorbing the excess 50+ ppm of CO2 threatening our human and natural future.

Why shouldn't our entire economy be organized around this fact? Certainly our so-called "waste" stream should be recognized for the valuable organic resources it holds. These treasures - organic material, compost - must be given a vaunted place in our human hierarchy if we are to manage our way out of the climate trap we humans created.

My challenge to you, Ken, and your able department, is to find the way to safely fast-track the planning, approval, funding, construction and operation of organics processing facilities. This is a natural outgrowth of the legislative initiatives adopted in the last session. And those were the results of decades of earnest work by thousands of California citizens, elected officials, government staff and private sector professionals – from ranch and range to landfill and inner city. It's the logical next phase to the "vision quest" launched with AB939.

We are turning the page on landfilling and wasting, we need you to envision the pathway to a safe, productive carbon positive future. We've been preparing ourselves to undertake this mission for years, it just happens to be the last, best chance we have to avoid catastrophe.

Please step up to this daunting and spectacular challenge. Find the way. Make us proud. Save our bacon.

Sincerely,

**KEVIN DREW**

Kevin Drew  
Residential and Special Projects Zero Waste Coordinator  
San Francisco Department of Environment  
kevin.drew@sfgov.org

cc: Carroll Mortensen  
Scott Smithline  
Mark DeBie