March 1, 2013

To: SLO County Board of Supervisors

Re: Sewage Sludge Land Application

Dear Supervisors,

The agenda item for your March 12, 2013, board meeting pertaining to the interim ordinance for the Land Application of Treated Sewage Sludge presents you with several options: Extend the existing Land Application of Treated Sewage Sludge/Biosolids interim ordinance until March 2017; make the existing Land Application of Treated Sewage Sludge/Biosolids interim ordinance the permanent ordinance; or move forward with the draft ordinance with the intention of permanently replacing the interim ordinance.

On behalf of the Sierra Club’s members in San Luis Obispo County, we urge you to accept the staff recommendation to amend the expiration date for Ordinance 3023: Moratorium on the Land Application of Treated Sewage Sludge/Biosolids from March 9, 2014 to March 9, 2017.

We believe the options of making the interim ordinance permanent or processing a new permanent ordinance are premature, primarily for three reasons:

1. The interim ordinance does not regulate compost containing sewage sludge, and allows land application of sewage sludge containing significantly higher levels of contaminants than are found in locally generated sludge.
2. As we have noted previously, the County has yet to address or incorporate options for disposal/reuse as alternatives to the land application of sewage sludge, and should not adopt a permanent policy until it has examined these sludge management alternatives.
3. The new draft permanent ordinance addresses only nine of the thousands of pollutants and toxic compounds sewage sludge is known to contain. It would result in a significant increase in the concentration of heavy metals in soil and does not address this cumulative impact.

Thank you for your consideration in this matter,

Greg McMillan, Chapter Chair