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Frank Franciosi

June 15, 2017

Leslie Olson, AICP

Director St Lucie County Planning and Development Services
Department Planning & Economic Development, Building & Code
Enforcement

2300 Virginia Avenue
Fort Pierce, FL 34982

RE: St. Lucie County's Proposed Composting Ordinance 17-XXXX

Dear Ms. Olson,

The US Composting Council has received the proposed Commercial Composting Ordinance from our colleagues at the Recycle Florida Today's Organics Recycling Committee. After review of the ordinance the USCC believes that the ordinance would effectively prevent the construction of any compost facility within St. Lucie County by making it economically impossible for a facility to be constructed. Examples of provisions in the ordinance that would most seriously impact the economic viability of constructing and operating a compost facility include:

- Enclosing the entire process, from raw material grinding through storage of finished product, in a building
- Requiring 72-hr, 100 yr rain event storage
- Requiring fire lanes inside the building without regard to technology type

The prevention of odor and the treatment of storm water are serious issues and should be managed properly. However, there are other less costly alternatives for addressing these issues. For example, composting pads can be designed to separate storm water from wastewater with proper collection, reducing the size and scope of treatment. Likewise, odors can be prevented and mitigated with best operational practices. It has been the experience of USCC members, which includes facility operators, state regulators and urban planners, that some aspects of managing a composting facility can benefit from being inside a building, while others can be negatively impacted.

Around the country, there are hundreds of large commercial compost manufacturing facilities operating in an environmentally responsible manner. Thanks to them, millions of tons of organic residuals are being recycled into useful products that enhance our soils and improve plant growth, while reducing the impacts of those organics on the environment, preventing the spread of both human and plant pathogens, increasing the recycling rates of their communities, providing green jobs and supporting their local economies. Indeed, in the recent report from ReFED on meeting the challenge of cutting

the amount of wasted food in half by 2030, large scale composting has by far the greatest potential for moving large volumes away from disposal.

We know St. Lucie shares our goals of responsible environmental stewardship of organic resources and the local environment, and we would welcome the opportunity to make specific suggestions to improve the workability of the ordinance to meet these complimentary goals.

We urge you to extend the workshop and discussion time period and provide an opportunity for the Organics Recycling Committee, FDEP, and others to engage in constructive dialogue that help the county meet it's goals while keeping the requirements reasonable.

Regards,



Frank Franciosi,
Executive Director

About the USCC:

Established in 1990, the US Composting Council (USCC) is the only national organization in the United States dedicated to the development, expansion and promotion of the composting industry. The USCC achieves this mission by encouraging, supporting and performing compost related research, promoting best management practices, establishing standards, educating professionals and the public about the benefits of composting and compost utilization, enhancing compost product quality, and developing training materials for composters and markets for compost products. USCC members include compost producers, marketers, equipment manufacturers, product suppliers, academic institutions, public agencies, nonprofit groups and consulting/engineering firms.