



P.O. Box 4024
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To
The Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

December 1, 2020

Reg: Zoning Text Amendment 20-04, Farming Defined -Accessory Mulching and Composting
Position: Support

Dear County Council Members,

On behalf of nearly 6000 members of Sierra Club in Montgomery County, we write to support ZTA 20-04, introduced by Councilmember Glass. This amendment would increase the amount of off-site food waste that farms can accept for composting from 20 percent to 50 percent.

In 2017, Montgomery County produced about 130,000 tons of food scraps. Adding in non-recyclable food-stained paper like pizza boxes, could bring the total of potentially compostable food waste to 182,000 tons.¹ That's about 346 pounds per resident per year, much of which could be diverted and turned into a healthy soil amendment called compost.

Adequate supplies of compost for our county's farmers are critical to growing fruits and vegetables that meet the food supply demands of a growing population. Because it removes excess carbon from the atmosphere, compost also helps protect and restore agricultural soils and can move Montgomery County closer to achieving its net zero emissions target by 2035.² Further, compost amendments to soil strengthen the health of the landscape, reduce stormwater runoff in developed areas, and protect against erosion and the degradation of streams. Our 93,000-acre Agricultural Reserve could contribute significantly toward carbon sequestration through the addition of large quantities of compost to nourish soils that provide the ever-growing supply of food needed for our residents.

In 2017 the County enacted Bill 28-16, which required the development of a strategic plan to reduce food waste and advance composting. The plan called for, among other things, greater efforts to increase on-farm food scrap collection and composting.³ This ground-breaking report has since been followed up by the final report of the county's Zero Waste Task Force. The Task Force, which called for the closure of the Dickerson trash incinerator by 2026, recommended that

¹ Montgomery County Department of Environmental Protection, Recycling and Resource Management Division, *Table 4.2: Waste Recycling by Material Type: Achievement and Opportunity, 2017.*

² *Montgomery County Sequestration Workgroup Agricultural Methods and Solutions*, <https://www.montgomerycountymd.gov/green/Resources/Files/climate/workgroup-recommendations/sequestration-appendix-b.pdf>

³ *Montgomery County Department of Environmental Protection, Strategic Plan to Advance Composting, Compost Use and Food Scraps Diversion in Montgomery County, April 2018.*

the County accelerate pilot food waste and organics diversion programs to move closer to zero waste.⁴

Currently, only a small percentage of food scraps produced in the single-family and multi-family residential sectors is collected for transport and production of composting materials on farms, not to mention in community composting enterprises, or in backyards. The remainder is either placed in garbage disposals (where it must be processed by wastewater treatment facilities) or disposed of by residents with their regular trash and sent to the incinerator in Dickerson, adding to the production of greenhouse gases and contributing to climate change. Commercial entities like grocery stores and restaurants make up 55 percent of the food waste and non-recyclable paper in the county. All of these categories of food waste are an enormous untapped source of materials for composting. Furthermore, composting this food waste on farms and other appropriate sites can create green jobs.

The Montgomery Department of Agriculture has noted that the current limit on the amount of food scraps imported to farms for composting, 20 percent, was an arbitrary number with no real basis in policy. We support increasing this limit to 50 percent.

Sierra Club MC believes that the proposed ZTA 20-04 is an important component of a multi-pronged food waste reduction policy that should also include county or private curbside food scrap collection, backyard composting, community composting and commercial food waste composting. Finally, we strongly support the Department of Environmental Protection's current efforts, working with the Department of Agriculture, to site a world class food waste composting facility within Montgomery County similar to the Prince George's County's Western Branch Facility, and we encourage all members of the County Council to take a tour of existing and proposed facilities when appropriate.

Thank you for providing this opportunity to support efforts to advance food waste diversion and to support composting in Montgomery County.

Sincerely,

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⁴Memo from Montgomery County Integrated Waste Systems Strategic Task Force/Zero Waste and Strategic Plan Task Force, Chaz Miller, Chair to Montgomery County Executive Marc Elrich and Montgomery County Council, May 7, 2020, <https://www.montgomerycountymd.gov/SWS/Resources/Files/master-plan/task-force-recommendations.pdf>