



AGRICULTURAL PRESERVATION ADVISORY BOARD

November 30, 2020

Council President Sidney Katz
Montgomery County Council
100 Maryland Avenue
Rockville, MD. 20850

Dear Council President Katz:

APAB Recommendation on the Composting ZTA
20-04- Farming Defined – Accessory Mulching and
Composting

Please accept this letter as the Agricultural Preservation Advisory Board's - APAB position regarding the Composting Zoning Text Amendment 20-04.

In 2016, the County Government adopted Bill 28-16 Strategic Plan To Advance Composting, Compost Use and Food Waste Diversion.

https://www.montgomerycountymd.gov/COUNCIL/Resources/Files/bill/2016/Packets/20160628_4B.pdf

This proposed ZTA would permit up to 50% of the composting materials to be sourced from off-site. Since 1998, when the definition of farming was amended to allow the production of mulch and compost as an accessory use to farming, very few operations have begun. We believe ZTA would encourage more small scale operations to being that would aid in the County's efforts to reach its zero food-waste goal.

The APAB believes there are adequate provisions in place at both the state and county level that will govern composting operations. The County will begin to see more small scale composting operations like the Compost Crew which encompass up to 5,000 ft² meeting the Maryland Department of the Environment-MDE on-farm composting threshold that does not require a state permit. Composting operations that exceed 5,000 ft² will require an MDE composting facility permit that regulates the size of composting pad including the feed stocks of organic materials that are used as part of the decomposition process. Another provision that regulates the final compost product is the requirement of registering the product with the Maryland Department of Agriculture. To ensure the product is safe to use as a soil conditioner/amendment, the State Chemist Office tests and registers the product.

Additionally, the County Zoning Code requires a conditional use approval for Agricultural Processing involving all composting operations that exceed the magnitude of accessory use to

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farming. The State and County regulations stated above represent a good policy framework that needs to be considered as we discuss the merits of the next phase of composting in the County.

Sincerely,

Michael Jamison, Chairman

CC: Marc Elrich, County Executive
Jeremy Criss, Director, Office of Agriculture