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**Montgomery Soil Conservation District**  
18410 Muncaster Road - Derwood, MD 20855 - Phone (301) 590-2855

November 30, 2020

The Honorable Sidney Katz, President  
Montgomery County Council  
100 Maryland Avenue  
Rockville, Maryland 20856

RE: Montgomery Soil Conservation District Written Testimony:  
ZTA 20-04, Farming Defined – Accessory Mulching and Composting

Dear Council President Katz:

The Montgomery Soil Conservation District (MSCD) Board of Supervisors respectfully requests that you accept our following comments concerning ZTA 20-04, Farming Defined – Accessory Mulching and Composting as the District Board's written testimony to be entered into the public record for the December 1, 2020 Public Hearing.

#### **General Observations**

The sad reality we face these days is that organic wastes generally ends up in our methane-producing landfills. Traditional alternatives for handling these organic wastes have included sending these materials to large scale industrial level composting plants or to anaerobic digesters, where food wastes are transported from our communities to these processing facilities. While good intentioned, these types of operations may create more problems than we are trying to solve and therefore are not likely to be the ideal way to handle these organic waste materials.

The Montgomery Soil Conservation District believes ZTA 20-04, Farming Defined – Accessory Mulching and Composting, represents a step in the right direction for smaller scale, farm based, local composting as a better alternative to large scale composting facilities. When we compost locally, we can reduce our carbon footprint by not having to truck these materials to remote areas of the county or out of the County entirely. Not only do we reduce the numbers of miles these materials are transported but we can also reduce the number of trips. We can use these locally generated composted materials to support local food production, saving money while improving the health and welfare of our residents and our local environment.

Composting is also a critical component of a growing healthy soils environment. Composting helps to recover soil health by developing deep nutrient rich organic matter which may help to reduce reliance on Synthetic\_fertilizers.

**MSCD Position: General Support for ZTA 20-04**

The Montgomery Soil Conservation District Board of Supervisor's understand the important role local composting can play in the over health and welfare of our county residents and environment as an accessory use to farming. While the ZTA recommends: "*The production and manufacturing of mulch or compost where a maximum of 50% of the materials used in accessory processing can come from off-site sources*", the Montgomery Soil Conservation District Board of Supervisors recommends taking the following thoughts into consideration.

The County Council through this ZTA, should encourage small scale on farm composting as an accessory use whereby the composting area would encompass less than 5,000 square feet of compost production area. The Maryland Department of the Environment-MDE allows on farm composting without a permit to operate if the composting area is under 5,000 square feet. We believe this threshold would encourage on farm composting as an accessory use by reducing/eliminating permitting requirements.

A composting operation that remains as an accessory use to farming and receives up to 50% of off-site materials will help increase the carbon-nitrogen ratio of the compost pile. If the composting pad and operation exceeds 5,000 square feet, then the County should understand that a composting facilities permit is required by the MDE. The composting facilities permit granted by the MDE will also monitor the size and scale of the composting operation to determine whether the compost area encompasses more that 50% of the total farm acres. If a composting pad and operation encompasses more than 50% of the total farm acres, a conditional use of approval for Agricultural Processing would be required by the County.

With these thoughts taken into consideration, please accept the comments of the Montgomery Soil Conservation District Board of Supervisors in support of ZTA-20-04 and enter our comments into the public record for the public hearing set for December 1, 2020.

Sincerely,



Robert Butz, Chairman  
Montgomery Soil Conservation District

cc: County Council  
District Supervisors