

March 16, 2021

Montgomery County Council  
100 Maryland Avenue, 6<sup>th</sup> Floor  
Rockville, MD 20850

Re: Comprehensive Solid Waste Management Plan for the Years 2020-2029

Dear Councilmembers:

As a longstanding County resident interested in the County's moving toward zero waste, I appreciate the opportunity to share my views on the construction and demolition (C&D) waste provisions of the 2020-2029 Solid Waste Management Plan ("Plan").

The anticipated change in the composition of C&D waste from land clearing debris toward waste resulting from demolition, deconstruction and renovation of existing structures creates significant opportunities to encourage deconstruction and salvage of materials over demolition. Laudably, the Plan calls for (a) deposit programs for developers to encourage compliance with the existing 50 percent diversion requirement of C&D materials and (b) supporting the development of new markets for C&D materials. **The County, however, can do much more.**

**Increase the Required Diversion Requirement:** *The Plan should call for a goal of diverting 75-80 percent of C&D materials, and the County, through its commercial and residential housing codes, should gradually increase diversion requirements to these levels as salvage and reuse markets develop. These diversion rates are achievable,<sup>1</sup> and indeed several other jurisdictions have set higher mandatory rates for C&D waste.<sup>2</sup> The County should start by increasing the diversion rate to at least 60 percent when considering the 2018 International Green Construction Code and should create a trajectory for future increases. The Plan should require that County construction contracts implementing the Plan set diversion rates above those required of private entities. By indicating the intent to increase diversion rates, the County will motivate the private sector to invest in the necessary deconstruction and diversion infrastructure to achieve these higher rates.*

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<sup>1</sup> <http://www.wm.com/octwebinar.pdf> This webinar provided case studies showing how the Terrence Donnelly Center for Cellular and Biomolecular Research at the University of Toronto diverted 75% of its C&D waste during construction, and the Bill and Melinda Gates Foundation Campus achieved a 97% diversion rate of C&D waste. The webinar also provides excellent information on strategies used effectively by other communities and government entities.

<sup>2</sup> The City of Berkeley, California, requires that (a) newly constructed nonresidential buildings and (b) additions to and alteration and demolition of existing buildings divert 100 percent of asphalt, concrete, excavated soil and land-clearing debris and a minimum of 65 percent of other nonhazardous construction and demolition waste. <https://www.cityofberkeley.info/wastediversion/> San Francisco requires that all C&D debris be recycled or reused. <https://sfenvironment.org/construction-demolition-requirements> King County, Washington requires that readily recyclable materials from construction and demolition projects be recycled. Clean wood, cardboard, metal, gypsum scrap, asphalt paving, bricks and concrete are all banned from landfill disposal. <https://kingcounty.gov/depts/dnrp/solid-waste/programs/green-building/construction-demolition.aspx>

## Support Development of Private Sector Salvage and Reuse Markets

*Increasing diversion rates requires robust salvage and reuse markets supported by a steady and significant supply of and demand for C&D waste.<sup>3</sup>*

Real-Time Information on Supply and Demand: The County should work with the private and non-profit sectors to develop an interactive website allowing construction companies, C&D processing companies, and non-profits to post information on the availability of and demand for specific types of salvaged materials. In addition, the County should use websites and other vehicles to inform homeowners and small construction companies about salvage and reuse markets, including non-profit reuse entities.<sup>4</sup>

Skilled Deconstruction Workforce: Deconstruction and salvage requires greater skills than demolition. Workers need inexpensive, flexible training to develop these skills. The County should work with the construction industry, non-profits<sup>5</sup> and Montgomery College to help develop this skilled workforce so that demolition companies and workers can compete in the deconstruction market.

Supporting Entrepreneurs in Developing New Uses for Salvaged Material: The availability of salvaged materials can spur businesses to develop new uses for these products. The websites (above) linking supply and demand would contribute to this end. In addition, the Plan should call for development of the Resource Recovery Park, rather than just mentioning it as an “if/when” item and for recycling and reuse fairs where these new products and businesses could be showcased.

Low-cost Storage Space for Salvaged Materials: Small construction companies generate smaller amounts of salvaged material and usually lack storage space. Markets typically require sale of larger lots. Small firms need inexpensive storage space to enable them to work cooperatively with similar companies to aggregate enough material to permit competitive resale.

Section 5.6.5 of the Plan should include these four strategies to ensure that the Recycling and Resource Management Division of the Department of Environmental Protection has the scope under the Plan to support robust salvage and reuse markets.

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<sup>3</sup> <https://delta-institute.org/delta/wp-content/uploads/St.-Louis-Deconstruction-Market-Assessment.pdf>. One speaker in this market assessment program noted that contractors typically are willing to incorporate more used materials in projects if they know the supply is reliably available in large quantities. Increased demand flows from increased supply.

<sup>4</sup> Local non-profits, which often sell both low and high value salvaged materials and rely on donated material, include The Loading Dock, [www.loadingdock.org](http://www.loadingdock.org); Community Forklift <https://communityforklift.org/>; and Habitat for Humanity ReStores, <https://www.habitat.org/restore>

<sup>5</sup> Second Chance, for example, is a Baltimore non-profit which also serves the Montgomery County deconstruction market. Its workforce development program, which achieves a 98% graduation rate and works with difficult to employ individuals, provides classroom and hands-on field instruction in technical, safety and life skills. Graduates are guaranteed associate or supervisory-level positions within Second Chance's deconstruction services or retail operations. Graduates may take advanced training and receive certificates in carpentry, restoration, manufacturing, plumbing, electrical and masonry. Advanced training in forklift operation and lead abatement and other hazardous material removal and handling is also available. <https://www.seconchanceinc.org>