

Support of SB 229 - Environment – On-Farm Composti

Uploaded by: Colby Ferguson

Position: FAV



3358 Davidsonville Road • Davidsonville, MD 21035 • (410) 922-3426

January 25, 2022

To: Senate Education, Health & Environmental Affairs Committee

From: Maryland Farm Bureau, Inc.

Re: **Support of SB 229 - Environment – On–Farm Composting Facilities – Permit Exemption**

On behalf of our member families, I submit this written testimony in support of SB 229, legislation that requires the MDE to adopt regulations to exempt an on-farm composting facility from the requirement to obtain a permit if the on-farm composting facility uses 40,000 square feet or less in support of food scrap composting and meets any other condition for a permit exemption specified in regulations.

Food waste is a great source of organic matter and organic fertilizer. Allowing farmers to incorporate food scraps into their existing composting operation will not allow Maryland to divert thousands of tons of food waste from the landfills, but also increase the composted organic matter added back to the farm field. This would be a win, win for Maryland citizens and farmers.

Maryland Farm Bureau Policy:

- We support the right for Maryland farmers to make and process mulch and compost from both on and off the farm sources.

MARYLAND FARM BUREAU SUPPORTS SB 229 AND REQUEST A FAVORABLE REPORT

A handwritten signature in black ink, appearing to read "Colby Ferguson".

Colby Ferguson
Director of Government Relations

For more information contact Colby Ferguson at (240) 578-0396

SB0229_IndivisibleHoCoMD_FAV_ElizabethFixsen.pdf

Uploaded by: Elizabeth Fixsen

Position: FAV



**SB0229 Environment – On–Farm Composting Facilities –
Permit Exemption
Testimony before
Senate Education, Health, and Environmental Affairs
January 25, 2022
Position: Favorable**

Mr. Chair, Madame Vice Chair and members of the committee, my name is Elizabeth Fixsen, and I represent the 750+ members of Indivisible Howard County. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members). We are providing written testimony today in **support of SB0229**, to exempt from permit requirements on-site composting by farms up to 40,000 sq. ft. as long as they meet other exemption requirements.

Currently, a permit is not required for a facility that uses no more than 5,000 square feet in support of composting if it meets certain conditions. This bill would allow a facility up to 40,000 square feet to be exempt from permitting if it meets the other conditions for permit exemption. Allowing larger facilities a permit exemption, as long as they meet other permit exemption requirements, will increase on-farm composting in the state of Maryland.

However, we would ask that the bill be amended to include a provision for reporting quantity and source of off-farm waste accepted by the facility and to require that any off-farm materials brought onto the farm must be incorporated within 24 hours. (These concerns are more fully addressed in testimony by Emily Ransom of Clean Water Action.)

Composting of organic materials has many benefits. It diverts material from disposal, reduces greenhouse gas emissions, and creates a valuable product. Modern agriculture uses compost and mulch on annual crops, perennials, orchards, vineyards, and grasslands. Compost improves soil properties, provides nutrients in a stable organic form, increases plant growth and health, and conserves water. Mulch reduces weed germination, moderates soil temperature, and conserves water.

Thank you for your consideration of this important legislation.

We respectfully urge a favorable report.

Elizabeth Fixsen
Savage, MD 20763

¹ <https://mde.maryland.gov/programs/LAND/RecyclingandOperationsprogram/Documents/Permitting%20Guidance%20-%20Final%20Revised%201.22.2019.pdf>

¹ <https://mocofoodcouncil.org/wp-content/uploads/2015/08/Kaley-Laleker-and-Tariq-Masood-On-Farm-Composting.pdf>

¹ <https://www.calrecycle.ca.gov/organics/farming#:~:text=>

SB 229_MoCo_Criss_FAV (GA 22).pdf

Uploaded by: Jeremy Criss

Position: FAV

Testimony of Jeremy Criss
Director, Montgomery County Office of Agriculture
In Support of Senate Bill 229
Environment – On-Farm Composting Facilities – Permit Exemption
Education, Health, and Environmental Affairs Committee
January 21, 2022

I want to thank the Committee for this opportunity to speak in support to Senate Bill 229.

This legislation will increase the On-Farm Composting Facility Permit Exemption allowable threshold for composting certain Type 2 feedstocks, including food scraps from off-farm from 5,000 square feet to 40,000 square feet.

As a member of the 2014 Composting Facilities Working Group, I advocated for a Permit Exemption to help expand opportunities for On-Farm Composting in Montgomery County and the State.

When the Composting Facilities Regulations were adopted in 2015, I accepted the 5,000 square foot area limitation for the on-farm composting of Type 2 feedstocks such as food scraps as the first step for Maryland.

Since 2015, the Montgomery County Office of Agriculture has been working with farming operations to explore the 5,000 square foot area including the use of different feedstocks as part of the operation.

We learned that the 5,000 square foot area is a very limiting factor, and it creates a disincentive economically for farmers to implement on-farm composting.

One of these farms installed a maximum of 5,000 square feet and they are composting Type 1 and 2 feedstocks to produce a valuable product and soil amendment that is applied to the farmland in accordance with their Soil Conservation and Water Quality Plan and Nutrient Management Plan to increase soil health.

Last year, Montgomery County adopted a Zoning Text Amendment 20-04 to expand opportunities for on-farm composting which allows up to 50% of the materials being composted from offsite including food scraps.

The Composting Facilities Regulations currently allow farmers to compost materials generated from the farm up to a maximum of 40,000 square feet without a permit from the Maryland Department of the Environment.

The intent of Senate Bill 229 is to replicate this existing provision in the Composting Facilities Regulations and apply it to Type 2 feedstocks which includes food scraps with the requirement of a Soil Conservation and Water Quality Plan and Nutrient Management Plan and best management practices such as immediate mixing with carbon materials record keeping.

Thank you again and I would ask the Committee for a favorable report on Senate Bill 229.

SB 229.pdf

Uploaded by: Keith Ohlinger

Position: FAV

SB 229, Favorable

Keith Ohlinger
2790 Florence Road
Woodbine, Maryland 21797-7841

Dear Senators:

Thank you for the opportunity to testify before you today, I hope you and all your loved ones are safe and healthy in these strange COVID times. I am testifying before you today as a private farmer who has been involved with the Maryland Compost regulations since their inception. We have made and used compost historically in our family as long as anyone can remember. It is an integral part of our gardening and our nutrient management and soil fertility programs. It has an overall agricultural history dating back well over forty centuries.

The challenge we face is how do we provide food, clothing, shelter, building materials and energy for an ever-expanding population without destroying our planet in the process? Compost is one of the ways we can help. Many farmers already have the equipment, land, and expertise available to make compost on their farms and have done so in accordance with the regulations for several years now. It is time to expand what we can take to allow us to help the broader community, increase our soil health and expand economic base in the process by adding the changes we propose in this bill.

I live on and work on my farm with my family and we are very concerned about any issues involving the making of compost and we are very careful to make sure the regulations are followed and that we are including safeguards for the environment and the community. Please help us and allow us to do our part for a better future by supporting this bill. Thank you again for your time and I pray for the health of you and your loved ones during these times. Thank you for all you do.

Very Truly Yours,

Keith Ohlinger
Porch View Farm LLC

SB 229_eranson_fwa.pdf

Uploaded by: Emily Ranson

Position: FWA

SB229: Environment – On–Farm Composting Facilities – Permit Exemption

Senate Education, Health, and Environmental Affairs Committee

January 25, 2022

Positon: Favorable with Amendments

Dear Chairman Pinsky and Members of the Committee,

Clean Water Action supports SB229 to expand the footprint of on-farm compost facilities, but we have amendments to provide guardrails and head off poorly managed operations.

A critical piece missing in Maryland’s effort to divert food waste from landfills and incinerators is the capacity to compost food scraps. Meanwhile, Maryland farms use compost in their operations, and the ability to have a routine source of compost while earning income for accepting food scraps is a positive. Many farms across the state are using the current small compost permit exemption to take food scraps from nearby producers and incorporate it into their compost, creating better mixes of compost. The ability to add food scraps to on-farm generated materials allows farmers and composters to create a higher quality product.

High quality compost needs a mix of materials, the “green” and the “brown.” Greens are moist things like coffee grounds, vegetable scraps, and animal manure, while browns are dry materials like leaves, corn stalks, and paper. Greens tend to be rich in nitrogen and protein and help heat up the pile, while browns are carbon rich and provide the bulk in the pile to allow air to filter through. A proper balance of these materials helps produce high quality compost, but relying on on-farm generation of materials does not often produce the right mix.

This is why it’s so important to allow farms to bring in materials from off-farm sources. We have also heard that the limit of 5,000 square feet for these operations is too limiting, especially since it is not tied to the size of the piles but to the full footprint of the operation. We support this initiative to expand the footprint.

However, we have some concerns about scaling up a permit exemption without clear guardrails to protect surrounding water quality. Poorly managed waste piles can run off into nearby streams or rivers and can be rich in nutrients or bacteria, depending on what is in those waste piles. At 40,000 square feet, the permit exemption could create almost an acre of problematic practices and piles.

A major source of this concern is that people are paid to take the waste on the front end, creating an incentive to bring in more waste than the site can handle. If the property does not have the capacity or technical know-how to effectively manage compost piles and process that waste, then

we may create a situation where piles of waste stack up and languish, posing a water quality concern. Unfortunately, even at the 5,000 square foot permit exemption cases like this have occurred, and expanding the exemption to 40,000 square feet increases these concerns.

To alleviate these concerns, we support amendments to put reasonable guardrails on the program:

1. Require reporting of quantity and source of off-farm waste accepted
 - a. This is necessary so if piles of unmanaged waste build up on a property there is a system in place to know when that waste arrived
2. Require that off-farm materials brought onto the farm are incorporated into compost piles within 24 hours
 - a. Waste management is critical for preventing polluted runoff into nearby streams and rivers, and farms accepting off-farm materials should have a plan for those materials before accepting them
3. Farms with compost operations over 5,000 square feet should have both a conservation plan and a waste management plan
4. If the finished compost is being spread on fields, the Nutrient Management Plans for those fields should be on record at the Maryland Department of the Environment

Composting on farms has been a haven supporting new and growing compost companies within the state of Maryland. Expanding the ability of farmers to compost on their land and create an important soil supplement is a great opportunity to address the issues of food waste, soil health, and carbon sequestration. However, it is important that as we significantly expand the footprint allowed for these operations under a permit exemption that the state set up reasonable guardrails to make sure that the operations are well run and do not pose a threat to water quality.

Thank you,

Emily Ranson
Clean Water Action
eranson@cleanwater.org

SB 229_MDSierraClub_fwa - 25Jan2022.pdf

Uploaded by: Josh Tulkin

Position: FWA



Maryland Chapter
P.O. Box 278
Riverdale, MD 20738

Committee: Education, Health, and Environmental Affairs

Testimony on: SB 229 “Environment – On–Farm Composting Facilities – Permit Exemption”

Position: Support with Amendment

Hearing Date: January 25, 2022

The Maryland Chapter of the Sierra Club supports SB 229 with a clarifying amendment. This bill will expand the footprint for on-farm composting of food residuals without an MDE-issued permit from the current 5,000 square feet or less to 40,000 square feet or less. Current regulations allow on-farm compost facilities to operate without an MDE-issued permit within specific limits, including a footprint of 40,000 square feet or less for most feedstocks, but within a footprint of only 5,000 square feet for food residuals.

Expanding on-farm food scrap composting to 40,000 square feet without requiring an MDE permit will increase the availability of food residual composting operations and bring them closer to where food residuals are generated, with the following benefits:

- Conserving resources and increasing the use of compost, a valuable soil amendment for local farmers. It is an opportunity for farmers to reduce reliance on chemical fertilizers that pollute air and water and are a petroleum product requiring energy to produce.
- Diverting organic waste from landfills and incinerators. Food waste is nearly 18% of municipal solid waste (MSW) by weight in municipal landfills, and about 30% of MSW is compostable.¹ Landfill space in Maryland is already in critically short supply, with existing capacity to last 31 years.² Diversion of food waste will reduce costs to taxpayers for waste disposal and conserve landfill space for waste that cannot be diverted.
- Contributing to reaching Maryland’s Zero Waste food scrap goals of 60% diversion by 2025, 70% by 2030, and 90% by 2040.³ To achieve these targets, the state’s Zero Waste Plan calls for increasing food donation, promoting compost use, and phasing in a food scrap disposal ban in commercial and institutional organizations – all of which are promoted by this bill.
- Reducing future landfill methane emissions. The anaerobic decomposition of organic matter such as food residuals in a tightly compacted landfill releases methane, a greenhouse gas many times more potent than carbon dioxide.

While we support the objective of the bill, it is ambiguous about what part of the Maryland Code will be changed and any other requirements that the expanded food scrap expansion would have to satisfy. We propose a clarifying amendment that would increase the maximum area for food residual composting to 40,000 square feet without requiring an MDE permit if it:

¹ MSW Consultants. 2017. “2016 Maryland Statewide Waste Characterization Study: Final Report.” MDE, July. Figure ES-3.

²Department of Legislative Services, Office of Policy Analysis. 2017. “Solid Waste Management and Recycling in Maryland.” Annapolis, Maryland. p. vii. (<http://dls.maryland.gov/pubs/prod/NatRes/January-2017-Waste-Management-in-Maryland.pdf>)

³Maryland Department of the Environment (MDE). 2014. “Zero Waste Maryland: Maryland’s Plan to Reduce, Reuse, and Recycle Nearly All Waste Generated in Maryland by 2040.” December.

Founded in 1892, the Sierra Club is America’s oldest and largest grassroots environmental organization. The Maryland Chapter has over 70,000 members and supporters, and the Sierra Club nationwide has over 800,000 members and nearly four million supporters.

- is constructed and operated with a nutrient management plan;⁴
- implements either a soil conservation or agricultural waste management system plan;
- describes the composting facility components and design, schedule for storage and utilization of the materials, system maintenance, and operational requirements of general restrictions on composting;⁵ and
- can accept food scraps that are generated off-farm.

Most of these provisions can be found in COMAR 26.04.11.06§D, with the additional allowance for off-farm food scraps.

The Maryland Chapter of the Sierra Club urges a favorable report on HB 229 with an amendment clarifying how the bill will address these issues in the regulations. Diverting food waste from the waste stream would: conserve space in our landfills; reduce future greenhouse gas emissions; create green businesses and jobs; and benefit the agricultural sector. It is an important step on the path to zero waste.

Ben Fischler
Chapter Zero Waste Team
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Josh Tulkin
Chapter Director
Josh.Tulkin@MDSierra.org

⁴ COMAR 15.20.07.

⁵ COMAR 26.04.11.04§B

SB229_MPluta ShoreRivers_Fav w. Amend.pdf

Uploaded by: Matt Pluta

Position: FWA



Testimony IN SUPPORT WITH AMENDMENTS of SB229- Environment – On-Farm Composting Facilities – Permit Exemption
Education, Health, and Environmental Affairs Committee

January 25, 2022

Dear Chairman Pinsky and Members of the Committee,

Thank you for this opportunity to submit testimony in **SUPPORT WITH AMENDMENTS of SB229** on behalf of ShoreRivers. ShoreRivers is a river protection group on Maryland's Eastern Shore with 3,500 members. Our mission is to protect and restore our Eastern Shore waterways through science-based advocacy, restoration, and education.

ShoreRivers supports composting for the number of undeniable benefits that it provides, including the recycling of organic material, the natural approach to addressing solid waste concerns and the environmental impacts from landfills, and the use of the end composted product as a means of increasing soil absorption and as a natural alternative to synthetic fertilizers. We also support composting as an alternative means of managing poultry manure. However, we have concerns with incentivizing this industry to grow, without adequate oversight, and to the point where it could become a source of nutrient pollution and a threat to local water quality.

This bill increases the size a composting operation can be from 5,000 sq. ft. to 40,000 sq. ft. (0.9 acres) while being exempt from needing a composting permit from Maryland Department of the Environment. We also understand that the intention of the bill is to exempt only those farmers who are re-applying finished composted material on fields that they own, and not selling the product.

As we understand the bill, composting operations will be allowed to receive and store more material but without oversight to make sure it's handled properly. Handling the raw (pre-composted) product is important because if it's improperly stored and too much organic material gets into a local waterway it'll increase the Biological Oxygen Demand (BOD), also known as how much oxygen that organic material takes out of the water to decompose, taking the necessary oxygen away from other aquatic life. **To safely manage the storage of the raw product the landowner should follow an approved Agricultural Waste Management System Plan to clearly state how and where the raw material is to be safely stored, and record-keeping of the quantity and source of material received. In addition, the landowner must follow an approved Water Quality Conservation Plan that identifies the best management practices in place to prevent the raw material from entering local streams and waterways.**

We also understand that the sponsor may be considering amendments that require material that's brought to the farm to begin being composted within 24-hours, however, **without required record-keeping this requirement is not enforceable.** And secondly, the **bill will need to better define what it means to begin being composted**, as a pile of raw material placed on the ground could be considered to have begun being composted.

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Our final concern is how this bill will increase the unregulated production of compost while also incentivizing the increased application of composted material on farms without verifying that the farm can accept the additional nutrients and that the material isn't being overapplied. There's no secret that the over application of organic material on the Eastern Shore, particularly poultry waste, has caused impairments to the local waterways. We're concerned that with this bill that an increasing number of landowners will be producing more compost than they can safely apply, which might lead to them certifying their product with the state and selling it or mishandling and overapplying the material. **To provide better oversight, transparency, and accountability of the nutrients in the finished product, we feel that a landowner applying compost under this bill should be required to have their Nutrient Management Plan (NMP) on file with MDE.**

For these reasons stated above, ShoreRivers asks the Committee to adopt a **favorable report that includes these necessary amendments** on **SB229**.

Sincerely,



Matt Pluta

Choptank Riverkeeper , on behalf of:

ShoreRivers

Isabel Hardesty, Executive Director

Annie Richards, Chester Riverkeeper | Matt Pluta, Choptank Riverkeeper

Elle Bassett, Miles-Wye Riverkeeper | Zack Kelleher, Sassafras Riverkeeper



Senator Gallion SB 229 FWA.pdf

Uploaded by: Senator Gallion

Position: FWA

JASON C. GALLION
Legislative District 35
Harford and Cecil Counties



Education, Health, and
Environmental Affairs Committee

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THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

January 21st, 2021

The Honorable Paul Pinsky, Chair and Members

Senate Education, Health, and Environmental Affairs Committee

Re: SB 229 – On-Farm Composting Facilities – Permit Exemption

Position: Favorable w/ Amendments

Chairman Pinsky and EHEA Committee Members:

SB229 is enabling legislation that would increase the square footage permit exemption for an on-farm composting facility to 40,000 square feet. This increase would allow on farm composting operations to expand and provide less reliance on landfill facilities.

Sincerely,

A handwritten signature in blue ink that reads "Jason Gallion".

Senator Jason Gallion

Senate Bill 229 - On-Farm Composting Facilities -

Uploaded by: Jen Nelson

Position: INFO



January 25, 2022

The Honorable Paul Pinsky, Chairman
Senate Education, Health, & Environmental Affairs Committee

Re: Senate Bill 229 – Environment – On-Farm Composting Facilities – Permit Exemption

Position: **Informational**

Chairman Pinsky & Committee Members:

I am writing on behalf of the Maryland Association of Soil Conservation Districts (MASCD) to provide information regarding on-farm composting. Senate Bill 229 – Environment – On-Farm Composting Facilities – Permit Exemption, requires the Maryland Department of the Environment to establish an exemption from permitting for on-farm composting sites that meet all necessary regulations and use less than 40,000 sq. ft.

MASCD, incorporated in 1956, promotes practical and effective soil, water, and natural resource related programs to all Marylanders. Through individual conservation districts MASCD provides leadership, education, cooperation, and local direction, on a voluntary basis, promoting these initiatives. MASCD is an advocate for the responsible practice of composting throughout our urban and rural landscapes because it reduces carbon emissions and provides a nutrient rich conditioner to our soils that improve crop yields. Through a coordinated approach, on-farm composting facilities can assist in building a more sustainable food system throughout Maryland and can improve the soil quality on our farms.

Thank you for your kind consideration and attention to this legislation.

Respectfully Submitted,

Jen Nelson, Executive Director
Maryland Association of Soil Conservation Districts

SB0229 LOI.pdf

Uploaded by: Tyler Abbott

Position: INFO



January 25, 2022

The Honorable Paul G. Pinsky, Chair
Education, Health, and Environmental Affairs Committee
Miller Senate Office Building, Suite 2W
Annapolis, Maryland 21401

Re: Senate Bill 229 – Environment – On–Farm Composting Facilities – Permit Exemption

Dear Chair Pinsky and Members of the Committee:

The Maryland Department of the Environment (MDE) has reviewed Senate Bill 229 entitled *Environment – On–Farm Composting Facilities – Permit Exemption* and we would like to provide information regarding this bill.

Under §9-1725 of the Environment Article, MDE has broad authority to adopt regulations to establish conditions under which a person may construct and operate a composting facility in the State, including establishing exceptions to any requirement to obtain a Composting Facility Permit or approval from the Department. Senate Bill 229 would amend §9-1725 of the Environment Article to require MDE's regulations to exempt an on–farm composting facility from the requirement to obtain a Composting Facility Permit if the on–farm composting facility uses 40,000 square feet of area or less in support of food scrap composting and meets any other condition for a permit exemption specified in regulation.

MDE regulations currently exempt an on-farming composting facility from the Composting Facility Permit if the facility uses 40,000 square feet of area or less in support of composting; however, the exemption allows for the composting of food scraps only if those materials were generated on site or at another farm controlled by the same operator. The exemption also allows for the composting of Type 1 feedstocks (e.g., yard waste) and animal manure and bedding, regardless of the site of generation (*see* COMAR 26.04.11.06D). Under Senate Bill 229, MDE would need to amend the regulations to include a Composting Facility Permit exemption for on-farm composting facilities using 40,000 square feet of area or less in support of food scrap composting, regardless of the site of generation.

House Bill 817 of 2011 required MDE, in consultation with the Maryland Environmental Service (MES) and the Maryland Department of Agriculture (MDA), to study composting in the State, develop recommendations on how to promote composting in the State, and report findings and recommendations to the General Assembly. To conduct the study, MDE convened a Composting Workgroup that included representatives from MDA, MES, the composting industry, local governments, and other stakeholders. The final report from the study recommended that MDE adopt regulations with a tiered system of permits and permit exemptions for composting facilities. The final

report from the study specifically recommended a tiered approach to on-farm composting, with certain on-farm composting activities exempt from the permit requirement and others subject to the same permit and operational conditions required of non-farm facilities. This approach was further refined, with additional stakeholder consultation, during the development of the composting facility regulations.

MDE supports initiatives that promote composting of food scraps and on-farm composting operations. In 2020, an estimated 167,228 tons or 18 percent of food waste generated in Maryland was recycled, an estimated 112,167 tons of which were composted. Composting of surplus food that cannot be diverted for human or animal consumption helps to reduce greenhouse gas emissions related to disposal, conserve existing landfill capacity, and create a valuable soil amendment that improves soil health.

Despite the benefits of composting, poorly managed composting operations can result in issues like leachate or other material discharging to surface and groundwaters of the State, nuisance odors, and insect and rodent infestations. The regulations were developed with the intention of preventing these issues at permitted facilities through design and operational controls and oversight, including provisions to prevent uncontrolled runoff or groundwater contamination from water that has contacted the feedstocks. MDE also sought to balance these environmental safeguards with more flexibility for smaller or lower-risk sites, including smaller facilities and on-farm facilities that managed the types of materials already typically managed on farms. Allowing a commercial-scale composting facility to accept and manage significant quantities of food scraps without a Composting Facility Permit as long as it is located on a farm would be inconsistent with the original rationales for the permit requirements and exemptions. Additionally, because the bill would allow a commercial-scale food scraps composting facility on a farm to operate without a permit and the accompanying safeguards, while still imposing those requirements on an identical facility located elsewhere, it may put operations on unequal competitive footing without any meaningful environmental distinction.

MDE recognizes the need to expand capacity for composting food scraps in particular, and is willing to work with bill's proponents and relevant stakeholders on any necessary regulatory adjustments to the composting facility regulations to ensure they are not overly burdensome to on-farm composting facilities but remain protective of public health and the environment.

Thank you for your consideration. We will continue to monitor Senate Bill 229 during the Committee's deliberations, and I am available to answer any questions you may have. Please feel free to contact me at 410-260-6301 or by e-mail at tyler.abbott@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyler Abbott", with a stylized flourish at the end.

Tyler Abbott

cc: The Honorable Jason C. Gallion
Kaley Laleker, Director, Land and Materials Administration