



Chair Bray and Senate Natural Resource Committee Members,

May 14, 2020

In 2016 Lamoille Regional Solid Waste Management District took your mandate, Act 148, very seriously and committed the financial and human resources necessary to develop a food scrap composting program called Lamoille Soil. In just over 2 years approximately 225 tons of food scraps have been diverted from the landfill and turned into our rich compost product that goes right back out to the community. This program also promotes the strategies of the Farm to Plate initiative and supports Vermont's Working Landscape.

Lamoille Soil is open for business and has the capacity to expand. The Lamoille Soil business plan was predicated on the phase-in of Act 148, sizing our operation for short-term need and long-term growth. The tipping fee at Lamoille Soil is \$35/ton, significantly lower than landfill fees, saving residents considerably while conserving landfill space, building healthier soils, and reducing damaging greenhouse gases. While our first commitment is to businesses and haulers within the 12-town consortium, we welcome food scraps from outside the District, just as we do for all our drop-off facilities.

One Lamoille Soil organics hauler has been crippled by the closure of Northern Vermont University, the Vermont Studio Center, and Johnson Elementary School. This hauler provides 4 local jobs, and some of the food scraps they collect feed a robust poultry enterprise supplying our communities with eggs and chicken all year. ***To delay the food scrap ban would further penalize haulers like these, cut off local food supplies, and undermine huge financial investments made to comply with Act 148.***

Large generators are already on board with food scrap diversion and the smaller ones and residents have been well primed for the July 1, 2020 deadline through comprehensive and widespread education, videos, advertising, technical support, and workshops. Attached is a partial list of those efforts. ***To pull the rug out under these tremendous human and financial investments is unnecessary.*** The Agency of Natural Resources has always led with a policy of "outreach and education before enforcement". They have repeatedly and openly reassured the public over the past year that they are not expecting 100% compliance, have no intention of opening trash bags, and are not the "trash police".

Any lack of planning, preparedness, or resources within the solid waste community should not be misinterpreted as a crisis or used as leverage in time of one. These same voices have been lobbying for years to delay or eliminate the organics separation requirement, one the entire Vermont legislative body had unanimously committed to in 2012.

As for risk and exposure, personal protective gear is part of the industry standard as we work with pathogens and vectors every day. Multiple improvements and adaptations to facilities and personal protective equipment (PPE) have been made to protect both employees and customers in the course of providing this essential service. Attached here is a copy of the guidance provided to the solid waste industry by the largest and widely respected trade association, Solid Waste Association of North

America. As industry experts they, and others such as OSHA, are confident that the administrative and engineering measures taken to reduce exposure to COVID-19 are appropriate. ***With proper PPE, social distancing, changes in schedules and adjustments in operations, industry experts assure the solid waste community there is no reason to disrupt the collection of trash, recycling and food scraps.***

Intermediate measures that might be considered include providing DEC a 'relief valve' for individual materials that are difficult to manage or have a negative economic value. LRSWMD currently pays \$84/ton for transportation and tipping of trash at the Coventry landfill and \$165/ton for transportation and tipping at the Materials Recovery Facility in Williston. Some of the blue bin materials can be managed within a reasonable customer fee structure and some cannot. That, however, is not a direct consequence of COVID-19 rather a function of fluctuations in supply and demand or global disruptor such as China exhibited. ***Therefore, the specifics of a 'relief valve' might better be discussed through a wider lens than COVID-19.***

Thank you for consideration of these points as they inform your conversation regarding proposed changes to Act 148.

Respectfully submitted,

Susan Alexander, Manager, LRSWMD