

I am urging you to include an Urban Scale section for composting in Part 115 so that present and future midsize urban composters throughout the State of Michigan are represented. Please see below for the requests to be included in this bill:

Part 115: Urban Scale composting operation with 20%-30% Class 1 compostable materials at 1,000-5,000 yards (Midsize)

• 20%-30% Class 1 Materials is needed for midsize urban composters:

- Urban composters work with zoos, restaurants, convention centers, and other fast-producing food-waste sources that exist in urban environments.
- Operations should not become stagnant when hitting the 10% maximum that exists in the current Part 115 proposal for midsize composting operations. Small scale operators (500-1,000 yards) are only allowed 5% class 1 materials.
- Success is in the finished product and at least 20% of Class 1 materials are needed. To maximize potential of quality compost, 10% is not enough to provide a good product, more feed stock, manure and food waste is needed.
- Food service numbers and materials need to be addressed at midsize and large scale composting, for a city to truly compost as a zero waste practice.

• Carving out the urban piece for Part 115 is important because rural midsize means something totally different than urban midsize.

- 1,000-5,000 yards in an urban environment and 1,000-5,000 yards in a rural environment look very different.
- Urban composting allows for small satellites and larger composters to work together; with smaller composting facilities feeding and taking from larger facilities when needed. There is a lot of room for collaboration in the urban compost industry.
- Scaling and collaboration is key to success. Even in terms of hauling materials and collections of yard waste.
- Keeping compost at all scales local and decentralized, within the city, reduces costs and carbon emissions of hauling heavy food waste materials out to rural areas.
- Detroit's larger plans for green space growth and park improvements will require compost. It will save the city money if they can produce this compost locally. These initiatives and cost effective measures of producing compost locally would reduce city budgets and carbon emissions in cities across Michigan.

• As Part 115 now stands, it disproportionately increases costs of operations for urban scale composters who wish to stay relatively small while increasing their Class 1 Materials to meet the massive amount of food waste in cities and to create the best quality compost product.

- Most midsize urban composters will operate between 1,000-5,000 yards with an abundant access to food waste.

- If a small scale (500-1,000 yards) or a midsize (1,000-10,000 yards) composting operation processes more than 10% food waste, they will have to be regulated as a Large scale system.
- There are a lot more costs to be regulated as a 'Large Scale' composting operation. It requires composters to obtain a permit and financial insurance, in comparison to the current Mid-size operations that require only registration and no financial insurance for 1,000 - 10,000 yards.
- These additional requirements limit the likelihood and viability of any urban operation interested in expanding and restricts potential income for the growing number of urban farms that are unlikely to pay for the required permit and financial insurance as a large scale composting operation.

Thank you for considering this request and continuing this very important conversation of best practices in addressing equity in zero waste for the State of Michigan.

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