



Vineyard Conservation Society

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Martha's Vineyard Commission
33 New York Avenue
Oak Bluffs, MA 02557

September 17, 2019

Re: DRI #391-M4, MVRRRD transfer station expansion

Dear Commissioners,

The Vineyard Conservation Society (VCS) is a local member-supported non-profit land conservation and environmental advocacy organization, working since 1965 to preserve the natural resources and unique character of the Island. Over the years, VCS has on many occasions weighed in during the DRI review process, often in opposition to the expected impact of a proposal on our island's environment.

Regarding the proposal to expand operational space at the Edgartown transfer station, VCS is pleased to be able to offer our support for a project that has the potential to make a *positive* impact on the island's environment. Increased space at the District's central processing facility would provide opportunities to improve waste management in two critically important areas: organic materials (aka "food waste"), and conventional household recycling (e.g. plastics, metal, paper, and glass).

Since 2014, the state of Massachusetts has banned the disposal of food waste by businesses (and other institutions such as schools and hospitals) that create at least one ton of waste per year. While there has been no enforcement of the ban on Martha's Vineyard to date, it is unlikely the lack of enforcement will continue forever. Meanwhile, proposals to lower the threshold to 0.5 ton (which VCS supports) are gathering momentum. Further, since its inception, it has been presumed that the ban would eventually come to include residential food waste. The island currently lacks the infrastructure to comply with the law as it exists, much less the increased demands likely to come, in an economically and environmentally sustainable way.

Beyond compliance with the law, though, it simply makes good sense to improve our management of food waste. More than 10 million pounds is generated annually on Martha's Vineyard, all of which is shipped off island at great cost to taxpayers. As discussed in detail in the letter from the Island-Wide Organics Waste Committee (on which VCS sits), pilot projects are currently demonstrating the potential for large-scale composting to both manage waste locally and provide a marketable product. By reducing the number of trucks carrying trash off-island, and the number returning with commercial compost, we can reduce carbon emissions, save taxpayer money, and benefit the local economy.

In addition to the promise of an island-wide composting system, increased space at the transfer station would allow for more flexibility in addressing current challenges in household recycling. Changes in global recycling markets, especially the decision by China to ban nearly all imports from the USA, has led to an unsatisfactory

and unsustainable situation in many American communities – including ours. An important part of any solution is to reduce the contamination level of our recycling stream. Public education has an important role to play in this. Realistically, however, to reduce our contamination level by the amount necessary will likely require increased monitoring at transfer stations and/or a greater degree of sorting of materials (i.e. less “comingling”). Those changes, while challenging, become more feasible with an expanded central transfer station.

Thank you for the opportunity to comment on this important proposal for improving the future of our island’s waste management.

Sincerely,

Jeremy Houser
Communications & Ecologist

Brendan O’Neill
Executive Director