

May 15, 2025

## Testimony on Solid Waste Management and Zero Waste in Baltimore City's Fiscal Year 2026 Proposed Budget

In the five years since Baltimore signed a new contract with the BRESKO trash incinerator to send waste to the incinerator between 2021-2031, City leaders have made many commitments to Zero Waste. Upon the signing of the new contract in 2020, then-Council-President Scott [said](#), *"Under my administration, we're going to work to not burn as much at the incinerator as possible... And I will work my butt off to make sure that this is the last time we ever give them a new contract."* Upon taking office, Mayor Scott promised that his administration would *"Reduce chronic health disparities across racial and ethnic groups by decommissioning the use of waste incineration within the next decade"* in his [First Term Action Plan](#).

The [Less Waste Better Baltimore Master Plan](#) (LWBB), also adopted in 2020, outlined programmatic and infrastructure investments the City could make to reduce waste and divert it from the incinerator to reduce pollution and create local jobs. The Plan projected that Baltimore could achieve its Maximum Diversion Potential (increasing the overall diversion rate for all waste in Baltimore from 45% to about 83%) over a timespan of 20 years of investment, but noted that achieving this maximum diversion potential sooner was within the City's grasp: *"The City could aim to decrease any performance timeframe by phasing in options faster than assumed herein and/or by increasing funding to education, outreach, and other efforts to stimulate participation."*

But instead of moving faster to decrease the City's transition to Zero Waste, Mayor Scott's administration has moved slower, failing to invest financially in the steps outlined in LWBB and failing to increase the City's diversion rate. The [10-Year Solid Waste Management Plan](#) (SWMP), adopted in 2024, stepped backward from Less Waste Better Baltimore's timeline and shrugged off the responsibility of City government to lead in developing an alternative waste management system holistically for City waste: *"Until there is universal, coordinated adoption of waste diversion practices across public and private sectors, it is likely that the facility will continue to operate at or near its current throughput."* In response, the South Baltimore Community Land Trust (SBCLT), represented by the Environmental Integrity Project (EIP) and (Chesapeake Bay Foundation (CBF), [filed a Title VI complaint under the federal Civil Rights Act](#). This complaint outlines the environmental injustices of burning waste and polluting City neighborhoods, and demands practical remedies in City finances, investments, and policies. The EPA has granted the complaint, though it has not resolved the matter. And at a recent oversight hearing, the Council [learned](#) that the City has moved backward: between 2017 and 2024, although the volume of DPW-hauled waste diverted from incineration increased by about 8,000 tons, the volume of DPW-hauled waste brought to BRESKO increased by about 80,000 tons, and our total waste diversion rate actually decreased from 18% to 16%. This is a direct result of the City government's lack of financial investment in the necessary infrastructure and programming to reduce and divert the City's waste.

The proposed FY26 Operating Budget and FY26-31 Capital Improvement Program are another step backward. As Comptroller Henry [noted](#) in his abstention from the Board of Estimates vote on the

budget last week, *“the FY2026 budget as it is before us does not invest nearly enough in ... the Zero Waste initiatives that DPW has been promising for years – and requested be included – but were left out of the version before us today.”* While this budget proposal includes a partial remedy demanded in SBCLT’s Title VI complaint (increasing the landfill tip fee at Quarantine Road Landfill), it fails to invest those funds in Zero Waste remedies. Mayor Scott’s administration [denied specific Zero Waste projects for which DPW requested funding](#). Repeatedly in the last several years, DPW has asked for City investments in projects that are necessary to equitably transition the City away from BRESCO, only to see these requests decreased, delayed, or denied by the Finance Department or Planning Commission. In contrast, funding for the planned \$108 million investment in expanding the City’s landfill, budgeted over the last decade, has proceeded uninterrupted - projected to extend the life of the landfill by only 10 years.

The Council must amend the FY26 operating budget to fund Zero Waste programs, including yard waste and food waste collection and composting, and prioritize investments in waste reduction and diversion in coming years. Until the City budgets for Zero Waste as a meaningful priority worthy of investment, City policy will continue to result in more waste burned at BRESCO. Without a change, the City’s current course will make it all but impossible to meet commitments to end the City’s use of BRESCO in 2031, and will cause a financial and logistical crisis if BRESCO closes earlier than 2031.



## **Solid waste operating budget: revenue and surplus**

**Increasing the Quarantine Road Landfill tip fees is a partial remedy sought in SBCLT’s Title VI complaint. The Council should support it and should consider increasing it further.**

Baltimore City owns the Quarantine Road Landfill, and charges private haulers a tip fee per ton of waste disposed there. Since 1993, the tip fee charged to large haulers has been frozen at \$67.50 per ton. The FY26 budget proposal anticipates doubling this tip fee to \$135 per ton, raising **\$8.4 million** in new revenue. (This fee increase does not impact DPW-hauled waste, small haulers, residents hauling waste to landfill, or the disposal of ash from BRESCO, which Less Waste Better Baltimore indicates is the single largest waste stream at the landfill.)

In the Title VI complaint, SBCLT asked that EPA *“Require the City of Baltimore at Quarantine Road Landfill to increase its current tipping fee at Quarantine Landfill to account for inflation and consistency with regional practices.”* This change is a necessary step toward making Zero Waste progress. While the tipping fee for landfilling waste is artificially low, it is less economically attractive for large companies and institutions that use large haulers to reduce and divert their waste, and harder for Zero Waste businesses in sectors like reuse and compost to compete. The tip fee for

large haulers has effectively decreased each year by not adjusting to inflation. Effectively, this means that residents' taxes in the General Fund have been subsidizing the cost of large waste producers to throw away their trash at BRESKO: the tip fees charged to large haulers have not kept up with the cost of managing their waste at the landfill.

The proposed increase does not actually keep up with inflation since 1993. Adjusted to inflation, \$67.50 per ton in 1993 dollars is \$150 per ton today. The Council and the Administration should consider increasing the large hauler tip fee to \$150 per ton. This would raise \$1.9 million of additional new revenue, bringing the total new revenue from the landfill tip fee to **\$10.3 million**.

**DPW has a budget surplus in FY25. The Council should reinvest that surplus in Zero Waste.**

At the Budget and Taxation Committee's Third Quarter Budget Briefing on 5/13, BBMR [presented](#) that the Department of Public Works is projected to end FY25 with a \$6 million surplus, due to *"tipping fee savings and lower year-to-date non-personnel spending."* The tipping fee savings are not savings, but are due to the FY25 budget increasing the Wheelabrator Disposal tipping fee budget by an unprecedented 37%. The FY25 budget, like the FY26 proposed budget, [failed to invest in Zero Waste](#) - this \$6 million surplus could have funded such investments.

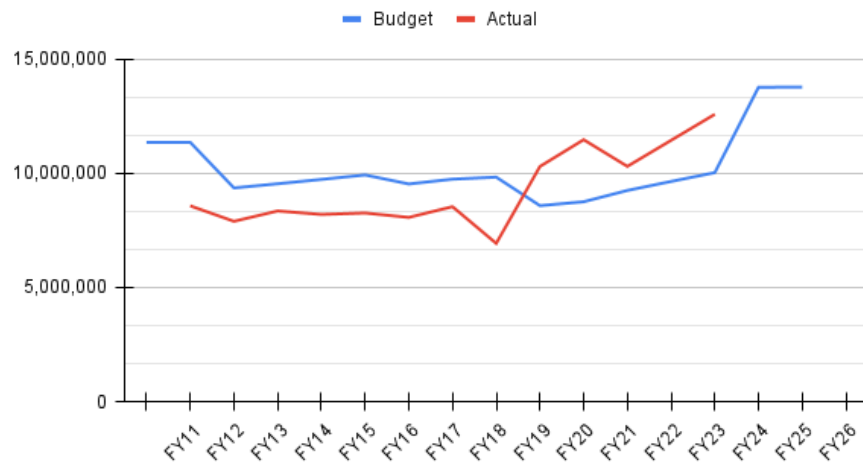
BBMR also [presented](#) that tipping fee revenue private haulers pay for waste disposed of at Quarantine Road Landfill has increased by \$2 million higher than projected for FY25, *"driven by an overall increase in landfill activity (private haulers and BRESKO ash."* This means that residents near Quarantine Road Landfill are facing increased landfill truck traffic and hazards, but not seeing the benefits of increased revenue being directed to solid waste solutions.

The Council should review the use of this **\$8 million** surplus in FY25, and direct surplus funds toward Zero Waste.

**The Council should decrease the Wheelabrator Disposal budget to its historic levels, and fund the Zero Waste programs that will decrease waste sent to BRESKO and therefore funds spent on Wheelabrator Disposal.**

The Wheelabrator Disposal budget increased by 37% (\$3.7 million) in FY25, and the FY26 budget proposal maintains this historic and unprecedented level of funding. After operating under budget for the prior decade, the actual spending on Wheelabrator Disposal increased dramatically in FY20, and has operated at a deficit since.

#### Activity 004 in Service 664: Wheelabrator Disposal, FY11-FY26



Baltimore City's [contract with BRESKO](#) sets the tip fees per ton of DPW-hauled waste that the City pays, which increase steadily at approximately 2.5% each year for the duration of the contract. The City's actual spending on this line item increased from \$6,933,009 in FY19 to \$10,301,831 in FY20 (a 46% increase) because DPW-hauled waste sent to BRESKO increased. While the start of the pandemic created many disruptions, including shifting more of the City's overall waste stream to the residential DPW-hauled sector, we cannot afford to budget with this as the new normal.

This increase has contributed to DPW's current FY25 surplus. At the Second Quarter Budget Briefing on 4/8/25, BBMR specifically [presented](#) that DPW's projected FY25 surplus was driven in part by "increase in tipping fees budget from FY24."

The Council should decrease the Wheelabrator Disposal budget to a historic normal (the average pre-pandemic actual spending in FY12-19, adjusted for inflation, is \$10.8 million), and invest the resulting **\$3 million** in waste reduction and diversion programs that will decrease our waste sent to BRESKO and therefore our Wheelabrator Disposal actual spending.

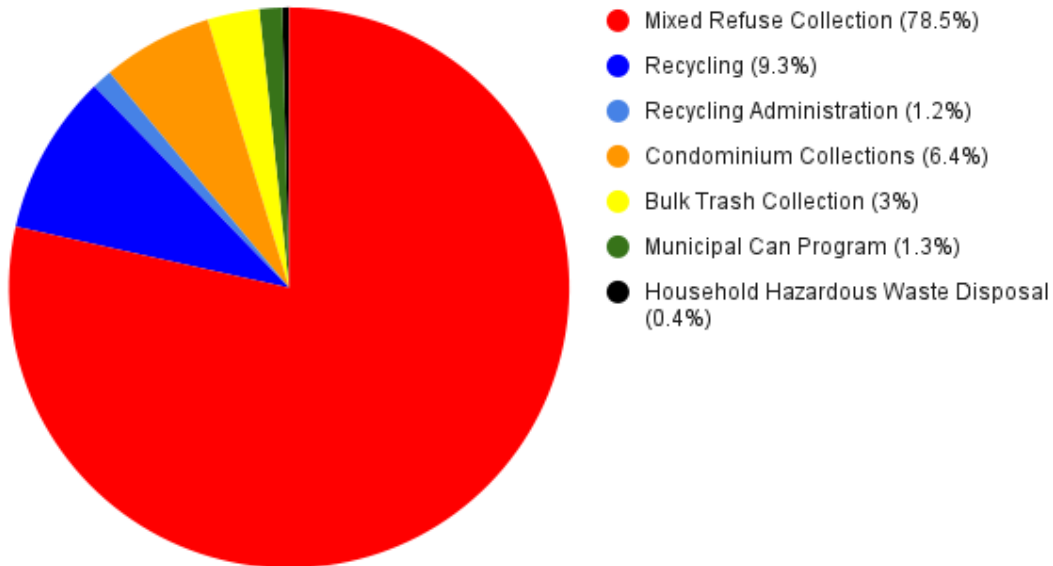


## **Solid Waste operating budget: Spending priorities and budget needs**

**The Council must invest new revenue and surplus within solid waste into solid waste solutions. The FY26 budget proposal does not.**

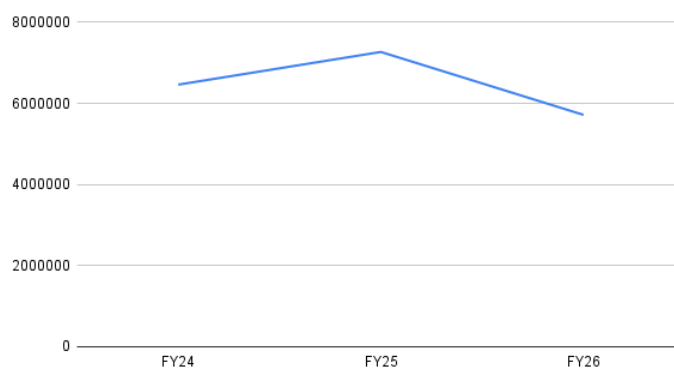
As in previous years, the current budget proposal invests City operating funds disproportionately in trash pickup, disposal at BRESCO, and management of the landfill, with little to no funding in Zero Waste alternatives.

### Service 663: Waste Removal and Recycling, FY26



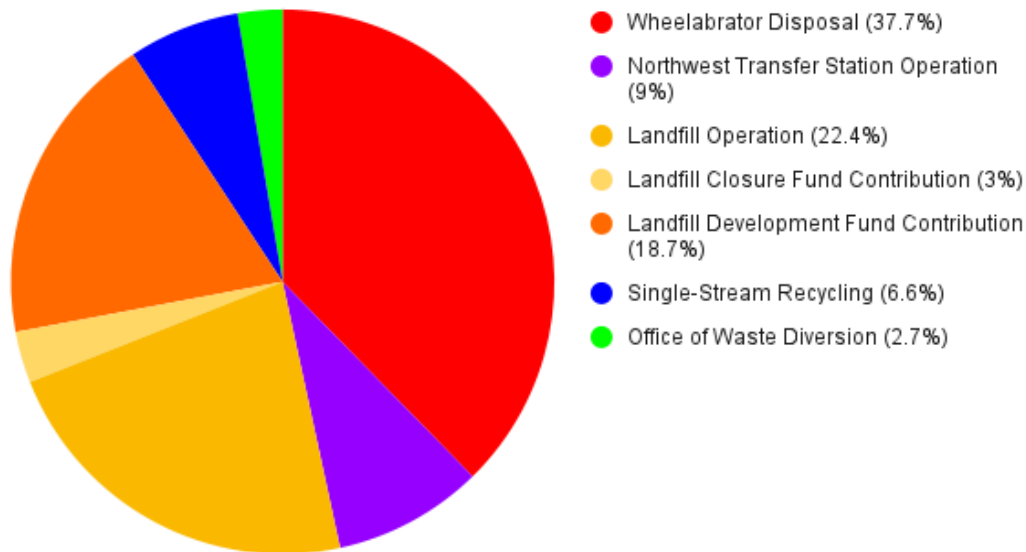
In Service 663, Waste Removal and Recycling, the FY26 budget proposal allocates 81.5% (\$44.7 million) to trash and bulk trash collection, and only 10.5% (\$5.7 million) to recycling collection and administration. The recycling budget has actually decreased by \$1.6 million since FY25, when it was funded \$7.3 million.

Recycling Collection and Administration, FY24-26



Organic waste collection (yard waste or food waste) is not funded in this budget proposal.

## Service 664: Waste Re-Use and Disposal, FY26



In Service 664, Waste Re-Use and Disposal, the FY26 budget proposal allocates 81.8% (\$29.9 million) to incineration and landfilling, and only 9.3% (\$3.4 million) to recycling and the Office of Waste Diversion. Over the past decade, the City has budgeted \$103 million for Wheelabrator Disposal, \$67 million for landfill operations, \$58 million in contributions over time to expanding Quarantine Road Landfill and closing the filled landfill cell, and just \$22 million in recycling processing.

Since no compost facility has yet been built, organic waste processing (yard waste or food scraps) is not funded in this budget proposal.

**DPW requested operating funds to implement waste reduction and diversion initiatives in FY26, but the administration denied these funds in the FY26 budget proposal. The Council must fully fund these initiatives to reduce waste disposed at BRESKO in FY26.**

Baltimore City currently has no program for separate yard waste collection and composting; yard waste is collected with regular trash and incinerated at BRESKO. Peer local governments in central Maryland ([Baltimore County](#), [Howard County](#), [Anne Arundel County](#), [Prince George's County](#), [Montgomery County](#)) collect yard waste separately from trash and compost it: Baltimore City stands alone in collecting yard waste with trash and incinerating it. Less Waste Better Baltimore estimates that there are 36,250 tons of yard waste in residential (DPW-hauled) disposed waste (11% of total disposed residential waste), meaning that the City is paying over \$2 million in the Wheelabrator Disposal line item each year just for incinerating residential yard waste. Most of our peer local governments have either piloted or permanently enacted food scrap collection for composting; Baltimore City likewise does not have curbside collection of food scraps for composting.

In summer 2024, the City Council considered [Ordinance 23-0466](#) to ban the disposal of yard waste in landfills or incinerators in the City, which would have prompted separate yard waste collection and composting in both the public and private sectors in Baltimore. This ordinance did not advance before the end of the Council term.

At the 4/30/25 Zero Waste investigational hearing, DPW staff [informed](#) the City Council that although they had made an Enhancement Request in November 2024 asking for FY26 funding to begin separate collection and composting of yard waste, as well as a pilot program for curbside collection of food scraps, the administration declined to include that in the budget. **The City Council should amend the budget to provide at least \$4.6 million to support the start of at least these two programs in FY26.**

Starting separate collection and composting of yard waste would require \$2.4 annually plus a \$1.7 year-one equipment cost, or **\$4.1 million** in FY26. With this funding, DPW would be able to offer separate collection of yard waste by 311 request, bringing the material to a privately-operated compost facility in Woodbine with excess capacity to accept it until the City-operated facility at the Eastside Transfer Station is operational in 2027. Implementing separate collection of yard waste before the City's own facility is operational is critical to the timely success of the program. DPW only projects capturing 15% of the City's residential yard waste, or 5,400 tons, in the first year of implementing separate yard waste collection. It will take time, and targeted communications, to inform City residents of the option and promote the behavior change of bagging yard waste and using 311 to call for yard waste pickup. DPW must receive investment to start separate yard waste collection in FY26, so that by the time the City-owned compost facility is operational in FY27 at a capacity of 12,000 tons, the capture rate is higher and we can more quickly move to expanding the facility to its full 24,000-ton capacity (which must be funded in the capital budget as outlined below).

Starting a phased-in food waste reduction & curbside collection pilot program would require **\$0.475 million** in FY26. With this funding, DPW could engage in communications and organizing around food waste reduction and implement a 500-household pilot program for City-supported curbside collection of food scraps. DPW must receive investment to pilot this program in FY26, so that a full program can be launched and expanded in FY27-FY31.

**The proposed budget makes important investments in new solid waste crews and worker conditions and safety. The Council should support these investments and engage with workers and union rank and file to prioritize further investments.**

The FY26 budget proposal includes \$5 million for additional solid waste crews, allowing shorter collection routes and less use of overtime, as well as \$0.125 million to mitigate hazards and improve safety for workers at solid waste facilities. These are important investments and preconditions to having an equitable, just, and safe solid waste system. The Council should maintain these investments and continue conversations with workers and union rank and file to identify further investments and improvements to prioritize in future budgets.





## Solid Waste Capital Budget

For Baltimore City to both advance in Zero Waste and to capture the significant jobs benefits associated with Zero Waste, we must build infrastructure within City limits that can employ City residents and benefit City communities. A study from the Institute of Local Self-Reliance [demonstrates](#) that composting employs two times more workers than landfilling and four times more workers than incineration per ton managed. The Less Waste Better Baltimore plan and 10-Year Solid Waste Management Plan call for building multiple compost facilities, distributed recycling facilities, and a Construction and Demolition materials recovery facility, among other investments.

In the three Capital Budget planning years since the 10-Year Solid Waste Management Plan was completed, the City has only invested \$1 million of GO Bond funding into Zero Waste capital infrastructure. Repeatedly, the Department of Public Works has requested capital funding for Zero Waste infrastructure, but the Department of Planning and Planning Commission have delayed or denied those funds. In comparison to this lack of investment, the City projects that the cost of expanding the Quarantine Road Landfill will total \$108,346,000 ([FY26-31 Capital Improvement Program Report: Planning Commission Recommendations](#), page 194), and DPW staff [informed](#) the Council at the 4/30/2025 oversight hearing that this is only expected to extend the life of the landfill by 10 years.

### Compost facilities

That city's plans propose a phased-in, decentralized approach to building 20,000 ton/year compost facilities throughout the city sequentially to meet growing demand for compost processing capacity. Less Waste Better Baltimore estimates Baltimore's Maximum Diversion Potential (goal for diversion from disposal at the landfill or incinerator) for organic waste at 78,300 tons per year.

Currently, the City has only planned financing to construct 12,000 tons/year of compost capacity through FY31. This facility was funded in FY24 through \$1 million of City GO Bonds with a \$4 million EPA grant [awarded](#) in September 2023. In FY24's planning stages, DPW requested \$8 million in GO Bond funding for the construction of compost facilities between FY26-FY29. After the City received the EPA grant, the Planning Commission reduced and delayed this City investment in the FY24 capital budget plan. In FY25 and FY26, those planned investments were eliminated, and there is no funding planned to increase the City's compost capacity through FY31.

	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31
FY24 requested	0	0	\$2 million	\$2 million	\$2 million	\$2 million	-	-
FY24 awarded	\$5 million*	0	0	0	\$1 million	\$2 million		
FY25 requested	-	0	0	0	0	0	0	-
FY25 awarded		0	0	0	0	0	0	



FY26 requested	-	-	0	0	0	0	0	0
FY26 awarded			0	0	0	0	0	0

\* \$4 million in federal funds from an EPA grant, \$1 million City match with GO bonds.

This compost facility will be located at the future Eastside Transfer Station at Bowley's Lane, and the \$21 million in GO Bond funding allocated for the transfer station in FY26 will complement the colocated compost facility. However, DPW staff [confirmed](#) at the Zero Waste oversight hearing on 4/30/2025 that the capacity of the compost facility once built (12,000 tons/year, 50% site capacity) will be no higher than the [capacity already funded in FY24](#). Despite significant interest among residents and institutions in the City for food scrap collection, DPW has only planned for this facility at its currently-funded capacity to accept yard waste, projecting an expansion to also process food scraps for a future expansion to bring the facility to its planned full capacity (24,000 tons/year).

LWBB calls for building multiple such facilities throughout the City to compost the city's yard waste and food scraps, but only one-half of one facility is currently projected to be built through the end of the current contract with BRESKO. Without additional capital funding for compost facilities in FY27-FY31, the City will have only built 12,000 tons/year of composting capacity by the end of the current contract with BRESKO - far short of the 78,300 tons/year of capacity needed.

### Recycling facilities

Less Waste Better Baltimore projects a Maximum Diversion Potential of 153,500 tons/year from improved and expanded recycling collection. The 10-Year Solid Waste Management Plan proposes constructing small-scale Materials Recovery Facilities (recycling plants) to reduce transportation costs and reliance on out-of-city vendors. It projected that design, permitting, and construction would take three years, and a new MRF could become operational as soon as 2029. (pages 184-186)

In FY24, DPW requested \$10 million between FY28-FY29 for this project, but the Planning Commission denied that request. No funding has been requested or awarded for these facilities in FY25 or FY26, leaving no investment planned through the end of the current BRESKO contract in 2031.

	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31
FY24 requested	0	0	0	0	\$5 million	\$5 million	-	-
FY24 awarded	0	0	0	0	0	0	-	-
FY25 requested	-	0	0	0	0	0	0	-
FY25 awarded		0	0	0	0	0	0	
FY26 requested	-	-	0	0	0	0	0	0
FY26 awarded			0	0	0	0	0	0

## Construction and Demolition materials facility

Less Waste Better Baltimore projects a Maximum Diversion Potential of 228,500 tons/year from reusing, reducing, and diverting construction and demolition materials. In FY24, DPW requested \$20 million between FY25-FY29 for a facility to better manage construction and demolition materials, but the Planning Commission reduced and delayed that funding to \$2.75 million across FY27-29. In FY25, DPW requested \$5 million across FY28-FY30, and the Planning Commission actually increased that funding to \$12 million. However, in FY26, DPW did not request any funding and the Planning Commission did not award any.

	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31
FY24 requested FY24 awarded	0 0	\$5 million 0	\$5 million 0	\$5 million \$1 million	\$5 million \$0.75 m	\$5 million \$1 million	-	-
FY25 requested FY25 awarded	-	0 0	0 0	0 \$0.5 m	\$1 million \$3.5 m	\$2 million \$4 million	\$2 million \$4 million	-
FY26 requested FY26 awarded	-	-	0 0	0 0	0 0	0 0	0 0	0 0

Explaining this lack of FY26 investment, staff labeled it a “Priority Change” and said “Prioritizing compliance and safety projects” ([FY2026-2031 Agency Requests vs. FY2025-2030 BOE Recommendations](#), page 16). These two investments must not be pitted against each other - both are necessary for the City to create an equitable and effective solid waste management system.



## Conclusion

Without amendment, the proposed FY26 budget represents a failure to keep promises City government has made to invest in Zero Waste solutions and make the City’s current contract to burn waste at BRESKO, now halfway over, its last. The Council must amend the FY26 Operating Budget to invest the significant new revenues and surpluses from solid waste into Zero Waste solutions, and work with the Department of Public Works, Department of Planning, and Planning Commission to plan for Zero Waste infrastructure investments in the FY27-FY30 Capital Improvement Plans.

Sincerely,

Jennifer Kunze  
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