



# MODEL COMPOST PROCUREMENT POLICY WITH COMMENTARIES

## *[insert name of municipal entity issuing policy]*

### 1. Purpose

a. *[insert name of municipal entity issuing policy]* requires the procurement of compost (finished compost products) by *[insert names of municipal entities subject to policy (e.g., “Smith City Departments”)]* and encourages the purchasing of compost by *[insert names of quasi-governmental and/or semiautonomous entities that the municipal entity issuing policy does not fully control, such as semiautonomous boards, commissions, and other authorities, or public-private partnerships such as convention centers]*, as well as by private entities, for use in projects where compost is a suitable material. By increasing the use of compost, the implementation of this policy will provide the following numerous benefits.

i. *Economic benefits*

1. Requiring the purchasing of compost can increase demand for compost and increase business for local compost suppliers.
2. Diverting organic waste to be composted can reduce costs associated with landfill disposal.
3. Growing the compost market may result in the development of new compost processing facilities, which in turn may provide more jobs.
4. Applying compost increases soil-nutrient and water retention, which may reduce demand for irrigation and fertilizer, thereby reducing operational costs.

ii. *Environmental benefits*

1. Diverting organic waste from landfill disposal reduces greenhouse gas emissions by minimizing methane emissions from landfills and maximizing carbon storage from composting—and may ultimately mitigate the need for new landfill construction.
2. Cycling carbon and nutrients back into soil through compost application conserves resources and improves soil quality.
3. Composting helps prevent erosion and stabilize land.
4. Composting increases the ability of soil to retain water, thereby reducing stormwater runoff.

In determining the entities subject to the compost procurement policy, numerous factors may be considered, including the issuing entity’s scope of authority, which, in turn, may be affected in part by the form of local government (e.g., council-mayor, council-manager, and commission)—as well as considerations such as political and budgetary constraints.

The list of benefits was compiled using the following sources: [Natural Resource Defense Council’s Guide to Composting at Sports Venues](#), [Institute for Local Self Reliance’s “Benefits of Composting.”](#) U.S. Environmental Protection Agency’s [Compost in Landscaping Applications](#), and [“Soils for Salmon.”](#) See also Revised Code of Washington, [43.19A.120](#) (State compost procurement law provides: “The legislature finds . . . that local compost manufacturing plays a critical role in our state’s solid waste infrastructure. Composting benefits Washington agencies, counties, cities, businesses, and residents by diverting hundreds of thousands of tons of organic waste from landfills, reducing solid waste costs, and lowering carbon emissions. . . . The diversion of food waste from landfills to compost processors remains critical for state and local governments to meet their ambitious diversion goals. The legislature also finds that composting is a strong carbon reduction industry for Washington, as the application of compost to soil systems permits increased carbon sequestration. Compost can also replace synthetic chemical fertilizer, prevent topsoil erosion, and filter stormwater on green infrastructure projects such as rain gardens and retention ponds.”)<sup>1</sup>

- 5. Reducing reliance on chemical fertilizers, which are often produced using fossil fuels, reduces water pollution that can result from fertilizer application and subsequent nutrient runoff.
- 6. Reducing reliance on irrigation conserves water resources.

b. The policy is not intended to supersede any existing federal, state, or local laws and regulations, including those that address materials procurement.

## 2. Municipal and state legal authority and policy support

a. **Municipal:** *[insert citations to relevant municipal policies, codes, and ordinances—such as waste management plans and procurement regulations—that offer support for issuance of a compost procurement policy].*

b. **State:** *[insert citations to relevant state laws and regulations—such as waste diversion and sustainable procurement goals—that offer support for issuance of a compost procurement policy].*

c. **U.S. Environmental Protection Agency (EPA):** EPA’s Comprehensive Procurement Guideline recommends that relevant procuring agencies—including local agencies that have spent \$10,000 or more on compost in the current or previous year, all or a portion of which came from federal funding—purchase compost made of recovered organic materials. The guideline recommends that procuring agencies “purchase or use mature compost made from recovered organic materials in such applications as landscaping, seeding of grass or other plants on roadsides and embankments, as nutritious mulch under trees and shrubs, and in erosion control and soil reclamation.”<sup>3</sup>

The [Environmentally Preferable Purchasing Policy](#) of Berkeley, California, has a similar but more expansive statement: “It is not the intent of this policy to require a department, buyer or contractor to take any action that conflicts with local, state or federal requirements or to procure products that do not perform adequately for their intended use, exclude adequate competition, or are not available at a reasonable price in a reasonable period of time.”<sup>2</sup>

## 3. Definitions

- a. **“Compost”** means solid waste that has undergone biological decomposition of organic matter, has been disinfected using composting or similar technologies, and has been stabilized to a degree that is potentially beneficial to plant growth and that is suitable for use as a soil amendment, artificial topsoil, or other similar applications.
- b. **“Composting”** means biological decomposition of organic constituents under controlled conditions.
- c. **“Contract”** means all types of *[insert name of municipal entity issuing policy]* agreements and contracts, regardless of what they may be called, for the procurement or disposal of supplies, services, or construction.
- d. **“Contractor”** means any person having a contract with *[insert name of municipal entity issuing policy]*.
- e. **“Cost prohibitive”** means the product purchasing cost exceeds by more than 10 percent the cost of another product that would serve the same purpose.<sup>5</sup>
- f. **“Erosion”** means the disintegration or wearing away of soil by the action of water.
- g. **“Green infrastructure”** means an approach to wet-weather management that is cost-effective, sustainable, and environmentally friendly, and that incorporates management approaches and technologies that infiltrate, evapotranspire, capture, and reuse stormwater to maintain or restore natural hydrologies. Green infrastructure practices include, but are not limited to, open space, rain gardens, porous pavements, green roofs, infiltration planters, trees and tree boxes, swales, and curb extensions.
- h. **“Impervious surface”** means any ground or structural surface that water cannot penetrate or through which water penetrates with great difficulty.

To promote consistency across policies, local governments may want to source these definitions from their own local or state codes and policies. Most of the definitions included in this policy were adopted from Tennessee laws and policies and other government laws and policies.

Another option is to source definitions from the U.S. Composting Council, which defines terms in its [Model Compost Rules](#) (including definitions of compost, composting, and stormwater).<sup>4</sup>

- i. **“Landfill”** means a facility, other than a land application unit, where solid wastes are disposed of by burial in excavated pits or trenches or by placement on land and covering with soil or other approved material.
- j. **“Locally produced compost”** means compost that is produced in the same region where it is being used.
- k. **“May”** denotes the permissive.
- l. **“Private entity”** means any person, business, or nonprofit that is not a government body or a contractor thereof.
- m. **“Procurement”** means buying, purchasing, renting, leasing, or otherwise acquiring any supplies, services, or construction. It also includes all functions that pertain to the obtaining of any supply, service, or construction, including description of requirements, selection and solicitation of sources, preparation and award of contract, and all phases of contract administration.
- n. **“Shall”** denotes the imperative.
- o. **“Stormwater”** means runoff that is generated from rain and snowmelt events that flow over land or impervious surfaces—such as paved streets, parking lots, and building rooftops—and does not soak into the ground.
- p. **“Top-dressing”** is a method of adding compost, mulch, loam, peat, or a combination of these things as improvements to the soil or for leveling existing lawns.

#### 4. Procurement requirements

##### a. General policy

- i. *[insert names of municipal entities subject to policy]*, except if otherwise exempted, shall purchase compost for use in public projects in which compost is an appropriate material, provided it is not cost prohibitive to acquire.
- ii. *[insert names of quasi-governmental and/or semiautonomous entities]*, as well as private entities that are based or operate in *[insert name of area governed by municipal entity issuing policy]*, are also encouraged to purchase compost, when possible, for use in their projects.
- iii. In conjunction with the overarching compost procurement requirement, compost shall be used to amend soil in landscaping and construction projects, as well as to provide for erosion control and stormwater management in road and highway and green infrastructure projects, in accordance with the requirements outlined in subsections 4.b. through 4.e. Compost used in landscaping, construction, roads and highways, and green infrastructure will count toward satisfaction of the compost procurement goals of *[insert names of municipal entities subject to policy]*.

##### b. Landscaping

- i. Using compost in landscaping projects improves the quality of soil and reduces the need for fertilizers and irrigation.
- ii. Soil amendment prior to new planting

Local governments may instead opt to require that a certain percentage of purchases is composed of compost, or that a certain portion of money spent is used on compost, and ramp up the percentage over time. ([Washington State](#): “The strategy shall incorporate actions to achieve the following purchase level goals of compost products. Compost products as a percentage of the total dollar amount on an annual basis: (1) At least forty percent by 1996; (2) At least sixty percent by 1997; (3) At least eighty percent by 1998.”)

This policy considers a product “cost prohibitive” if its cost exceeds the cost of an alternative product by more than 10 percent. Local governments may want to use a higher or lower percentage.

Furthermore, some local governments instead opt for a “whenever practicable” standard, which allows them to take into account factors in addition to purchasing cost ([Sustainable Purchasing Policy](#) of Sacramento, California).

In addition, some local government policies include a “price preference” or “bid discount.” Examples of this type of provision include: [Berkeley’s Environmentally Preferable Purchasing Policy](#) (10 percent price preference may be given to recycled-content products based on the lowest bid or price quoted by suppliers offering competing non-recycled-content products) and the [Code of Ordinances §187A.02-Preference for Local Producers, Local-Food Purchasers, and Local Sustainable Businesses](#) of Cleveland, Ohio (“A Contracting Department shall apply a Bid Discount of two percent (2%) to a bid received from a Local Producer; two percent (2%) to a bid received from a Local Sustainable Business . . . provided that the maximum total Bid Discount applied under this division (a) shall not exceed four percent (4%). . . . The maximum amount of any Bid Discounts applied . . . shall not exceed fifty thousand dollars (\$50,000.00).”)<sup>6</sup>

1. Prior to the installation of new plants in landscaping projects, *[insert names of municipal entities subject to policy]* are required, and *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities are encouraged, to amend existing soil with compost. This requirement does not apply if soil tests reveal that pre-amendment soil is composed of at least 6 percent organic material to a depth of 6 or more inches, or a condition exists that prevents the application of compost, such as oversaturation.
2. Soil shall be amended with compost at a rate of at least 4 cubic yards of compost per 1,000 square feet of soil. The compost shall be spread evenly across the project area, then incorporated into the soil to a depth of 6 inches. In areas where there are not 6 inches of soil in which to incorporate the compost, compost shall be incorporated at a rate of 25 percent compost to 75 percent soil to the existing soil depth.
3. Proof of satisfactory soil quality that did not require amending, the condition that prevented application of compost, or the completion of the required soil amendment with compost shall be documented by *[insert names of municipal entities subject to policy]* and made available for review by *[insert name of municipal office that oversees procurement or alternative entity]* upon request.

The following background materials may be useful:

- [Guidelines for Landscaping with Compost-Amended Soils](#) discusses the benefits of amending soil with compost, particularly for landscaping involving turf/traditional lawns.
- A brochure on [Achieving the Post-Construction Soil Standard](#) from King County, Washington, specifically addresses post-construction soil amendment, which is often done before landscaping.<sup>7</sup>

This language exempting sites with pre-amendment soil that already meets the organic material standards is modeled on [Sacramento's Water Efficient Landscape Requirements \(Ch. 15.92\)](#). Local governments could instead grant variances when proof is presented that the soil's organic material is satisfactory ([Soil Preparation for New Lawns in Greeley](#) of Greeley, Colorado). This approach, however, could require more administrative work, which may increase the cost of implementing the policy.

The 6 percent organic material exemption is modeled on [Sacramento's Water Efficient Landscape Requirements \(Ch. 15.92\)](#), and the other conditions exemption is from the [Washington State Department of Transportation's General Special Provisions Related to "Roadside Seeding, Lawn and Planting Area Preparation"](#) (p. 397). Provisions referenced:

- "Soils with greater than six percent organic matter in the top six inches of soil are exempt from adding compost and tilling." (Sacramento, California)
- "Compost shall not be placed when a condition exists, such as frozen or water saturated soil that may be detrimental to successful application or soil structure." (Washington State)<sup>8</sup>

This is a common requirement for soil amendment in the landscaping context. Examples of policies that require 4 cubic yards of compost per 1,000 square feet of soil: [Sacramento's Water Efficient Landscape Requirements](#), [Soil Preparation for New Lawns in Greeley](#), and the [Soil Amendment Program of Denver, Colorado](#). Some local governments include variations on the rule. For example, Denver's standard allows for the following modifications to the 4 cubic yards per 1,000 square feet requirement under certain circumstances (emphasis added):

- "Native grass-seeded areas may incorporate amendment at a rate of 2 cubic yards per 1,000 square feet. Seed mixes are required for submittal along with a map outlining the area.
- Soil amendment is not required within 5 feet from the foundation of the property.
- An application rate of 12 cubic yards per 1,000 square feet is required for amended topsoil."<sup>9</sup>

This approach to demonstrating compliance is intended to leave flexible the means of documentation to help ensure that the requirement does not impose a significant administrative burden. An alternative approach is to require submittal of documents for review and approval before landscaping activities can begin. For example, [Denver's Soil Amendment Program](#) states: "Proof of proper soil preparation is required before installation of plant material. Penalties may apply if soil amendment is not completed prior to the installation of plant material." Documentation on quantity, location, and application of soil amendment is required. Adopting this type of requirement, however, may increase administrative costs, as a result of review and approval of submitted materials.<sup>11</sup>

This provision is modeled after the [Composite Zoning Ordinance, Site Standards, Landscaping Requirements of Leander, Texas](#), p. 117, which states: "This six-inch (6") minimum soil depth will consist of 75 percent soil blended with 25 percent compost. The soil/compost blend shall be incorporated into the top two inches of the native soil. The six-inch (6") depth requirement does not apply to the area between the drip line and trunk of existing trees, shrub beds or wildscape areas." The 25/75 ratio is specifically for turfgrass in this context.<sup>10</sup>

iii. Ongoing maintenance

- 1. *[insert names of municipal entities subject to policy]* shall, and *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities are encouraged to, purchase and use compost, where feasible, in ongoing landscaping activities, such as for top-dressing.

Note, compost can be utilized in landscaping after plants are first planted. It can be applied as necessary to continue to amend and improve soil (see [“How to Preserve and Restore Healthy Soil”](#) (subsection [“Improving the Soil in Existing Landscapes”](#))).<sup>12</sup>

c. Construction

- i. In addition to providing benefits for post-construction landscaping, the use of compost to amend soil that is compacted or disturbed during construction projects increases on-site water retention, decreases erosion, and contributes to better stormwater management.
- ii. The following measures shall be implemented in construction projects undertaken by *[insert names of municipal entities subject to policy]*. It is encouraged, but not required, that the measures are adopted in the projects of *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities.

These provisions are modeled after King County’s [Post-Construction Soil Standard](#): “A person conducting a grading activity shall comply with the following standards: . . . The duff layer and native topsoil shall be retained in an undisturbed state to the maximum extent practicable. Any duff layer or topsoil removed during grading shall be stockpiled on-site in a designated, controlled area not adjacent to public resources and critical areas. The material shall be reapplied to other portions of the site where feasible. . . . Except as otherwise provided . . . areas that have been cleared and graded shall have the soil moisture holding capacity restored to that of the original undisturbed soil native to the site to the maximum extent practicable. The soil in any area that has been compacted or that has had some or all of the duff layer or underlying topsoil removed shall be amended to mitigate for lost moisture-holding capacity. The amendment shall take place between May 1 and October 1. The topsoil layer shall be a minimum of eight inches thick, unless the applicant demonstrates that a different thickness will provide conditions equivalent to the soil moisture-holding capacity native to the site. The topsoil layer shall have an organic matter content of between five to ten percent dry weight and a pH suitable for the proposed landscape plants. When feasible, subsoils below the topsoil layer should be scarified at least four inches with some incorporation of the upper material to avoid stratified layers. Compost used to achieve the required soil organic matter content must meet the definition of ‘composted materials’ in the [Washington Administrative Code]. . . . [The requirements do not] . . . apply to areas that . . . [a]re subject to a state surface mine reclamation permit; or . . . [a]t project completion are covered by an impervious surface, incorporated into a drainage facility or engineered as structural fill or slope.” See also King County’s [Achieving the Post-Construction Soil Standard](#).<sup>13</sup>

iii. Preserve existing soil

- 1. To the extent possible, *[insert names of municipal entities subject to policy]* shall keep original soil in place and avoid compacting it with construction equipment.
- 2. When existing soil must be moved during construction, *[insert names of municipal entities subject to policy]* shall keep it on-site for use once construction is completed.

iv. Post-construction soil standards and amendment

- 1. In areas where soil is left exposed after construction is completed (not impervious surfaces) and soil is being amended, *[insert names of municipal entities subject to policy]* shall, and *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities are encouraged to, amend the soil to achieve the organic matter and pH standards in the following subsection (4.c.iv.2). The soil shall be amended using compost.

This provision is modeled on Tennessee’s Department of Environment and Conservation’s Erosion and Sediment Control Handbook (p. 140).<sup>15</sup>

Note, while not directly related to compost, this provision is relevant for minimizing the demand for soil amendment in the first place. This approach is used in the King County guidance and is also discussed in Tennessee’s [Department of Environment and Conservation’s Erosion and Sediment Control Handbook](#) in the context of soil enhancement (p. 140). The handbook states: “Soil retention. The native topsoil should be retained onsite. . . . to the maximum extent practicable. In any areas requiring grading, remove and stockpile topsoil on site in a designated, controlled area, not adjacent to water resources and critical areas, to be reapplied to other portions of the site where feasible.”<sup>14</sup>

2. Soil shall be amended such that the top eight inches contain between 5 and 10 percent organic material and are restored to their original pH levels, or to pH levels between 6 and 8. Five percent is sufficient for turf, and 10 percent is sufficient for planting beds. The amount of compost that will need to be added to achieve these standards will vary depending on the initial quality of the soil. Custom amendment rates specific to the soil for a particular project may be calculated using an online calculator from King County, Washington: <https://kingcounty.gov/depts/dnrp/solid-waste/compost-calculator.aspx>. Alternatively, the following preapproved amendment rates may be adopted:
  - a. in turf areas, 1.75 inches of compost shall be incorporated into the top 8 inches of soil, which amounts to 5.4 cubic yards of compost per 1,000 square feet of soil; and
  - b. in planting beds, 3 inches of compost shall be incorporated into the top 8 inches of soil, which amounts to 9.2 cubic yards of compost per 1,000 square feet of soil.
3. If soil is particularly compacted, the top 4 inches of the soil below the 8 inches of amended soil shall be scarified.
4. Compost shall only be incorporated into dry soil.
5. Proof of satisfactory soil quality that did not require amending, or of the completion of the required soil amendment with compost, shall be documented by *[insert names of municipal entities subject to policy]* and made available for review by *[insert name of municipal office that oversees procurement or alternative entity]* upon request.

These rates were developed using King County's [compost calculator](#) to determine how many cubic yards of compost would be required to meet the King County preapproved amendment rates in order for the units to be comparable to those required by this policy in the landscaping context. Another option for local governments is to require that soil contain a certain percentage of organic material in both the landscaping and post-construction contexts, but this could require testing before the calculator could be used to determine how much compost to add the required organic matter.<sup>16</sup>

This requirement is included in the [Stormwater Management Manual for Western Washington](#), as well as Tennessee's [Department of Environment and Conservation's Erosion and Sediment Control Handbook](#) (with regards to soil enhancement, p. 139). According to the [U.S. Department of Agriculture](#), "Mechanical scarification is the tilling or ripping of the soil across the slope using farming or construction equipment."<sup>17</sup>

Some local governments ([King County](#) (p. 3)) require that "[s]oil amendment must take place between May 1 and Oct. 1 when soils are typically driest and less subject to compaction."<sup>18</sup>

**d. Roads and highways**

- i. Compost is used in road and highway projects to prevent erosion, promote vegetation growth, and improve the stability and longevity of roads and highways.
- ii. When undertaking erosion control measures in the context of road and highway construction and maintenance, *[insert names of municipal entities subject to policy]* shall use compost where possible, including when implementing best management practices that call for the use of organic material. Measures for which compost shall be used include, but are not limited to, the following:
  1. landscaping and planting;
  2. filter berms and socks; and
  3. compost blankets.
- iii. Compost shall contain the required organic material content, pH, and particle size for the intended use.
  1. Landscaping and planting:
    - a. moisture content—35 to 60 percent;
    - b. particle size—less than 0.5 inches;
    - c. soluble salts concentration—less than 4.0 mmhos/cm (ds/m);
    - d. stability—stable to very stable; and
    - e. pH—6.0 to 8.5.
  2. Filter berms, filter socks, and compost blankets: Ensure that compost adheres to the specific standards contained in the 2003 American Association of State Highway and Transportation Officials' Provisional Standards Manual for filter berms (applies to filter socks as well) and compost blankets.

Alternative approaches to ensuring compliance include [King County's](#) permit application system (p. 3), whereby soil management plans are submitted for approval and site inspections are conducted.<sup>19</sup>

The language in this section is modeled after [New York State's Department of Transportation's Compost Specification](#) (p. 190).<sup>20</sup>

California's Department of Resources Recycling and Recovery's definition of compost blankets: "A compost blanket is a layer of compost applied on the soil surface as a mulch, typically at a depth of 2 inches or 270 cubic yards per acre. A compost blanket protects soil surfaces from wind and water erosion, conserves water, and moderates soil temperature. In addition, a compost blanket improves the soil's physical, chemical, and biological properties, which provides a healthy growth medium, including nutrients, required for sustainable plant establishment."<sup>21</sup>

These specifications are from the [New York State Department of Transportation's compost specification](#) (p. 190).<sup>22</sup>

These standards are cited by [New York State Department of Transportation](#) (p. 190) and [South Carolina Department of Transportation](#).<sup>23</sup>

iv. Satisfaction of the quality specifications for compost used in road and highway projects shall be documented by *[insert names of municipal entities subject to policy]* and made available for review by *[insert name of municipal office that oversees procurement or alternative entity]* upon request.

**e. Low-impact development and green infrastructure**

- i. Incorporating compost into low-impact development and green infrastructure projects can help achieve stormwater management goals by filtering pollutants and keeping more water on-site.
- ii. When constructing low-impact development and green infrastructure projects, *[insert names of municipal entities subject to policy]* shall, and *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities are encouraged to, use compost where possible, including when adopting best management practices that call for the use of organic material. Measures for which compost shall be used include, but are not limited to, the following:
  - 1. green roofs;▲
  - 2. downspout disconnections; and
  - 3. bioretention projects/rain gardens.▲
- iii. *[insert names of municipal entities subject to policy]* shall consult local policies and manuals, including *[insert names of relevant local policies and manuals]*, for additional ways to incorporate compost into their projects.
- iv. The use of compost in low-impact development and green infrastructure projects shall be documented by *[insert names of municipal entities subject to policy]* and made available for review by *[insert name of municipal office that oversees procurement or alternative entity]* upon request.

Low-impact development is a “comprehensive land planning and engineering design approach with a goal of maintaining and enhancing the pre-development hydrologic regime of urban and developing watersheds” ([Low Impact Development Center](#)). Low-impact development aims to reduce the flow rate, volume, and contaminant level of stormwater runoff.<sup>24</sup>

[Guidance for green roofs](#) from Nashville, Tennessee, states: “The remaining media should contain no more than 15% organic matter, normally well-aged compost.” In addition, the [Stormwater Management Guidebook](#) (p. 33) of Washington, D.C., lists green roofs as a stormwater best management practice. Green roofs require the use of a growing media that combines inorganic and organic materials. The guidebook lists “well-aged compost” as one potential source of organic material.<sup>25</sup>

A rain garden is “a garden designed to intercept, store and soak in rain water.” The [RainScapes Rewards Rebate Program](#) of Montgomery County, Maryland, offers rebates to residents who install rain gardens. One of the specifications for creating qualifying rain gardens is that soil must be amended with compost.<sup>26</sup>

Both [Sacramento](#) and [Berkeley](#) discuss giving preference to compost that is made using debris generated within the region.<sup>27</sup>

Institute for Local Self Reliance’s [Growing Local Fertility: A Guide to Community Composting](#) discusses how distances covered by locally produced composting networks will vary in rural, urban, and suburban cities. It compares New York City, where networks may be measured in terms of blocks, with rural areas, where networks may span 50 miles (p. 7-8).<sup>28</sup>

Washington State law provides a specific exception to the requirement that local governments use compost in their projects, if compost products “are not available within a reasonable period of time.” Revised Code of Washington, [43.19A.120](#).

Another option is to require prior approval before a non-compost alternative can be purchased (similar to [Berkeley’s Environmentally Preferable Purchasing Policy](#), section 5.8). This could be more administratively burdensome, however.<sup>29</sup>

**5. Compost sourcing and quality requirements**

**a. Locally produced compost**

- i. Compost purchased by *[insert names of municipal entities subject to policy]* for purposes of complying with this policy shall be locally sourced.▲
- ii. If locally produced compost is not available, compost shall be sourced from outside the region, with preference given to products sourced as close as possible to *[insert applicable standard such as “Smith metropolitan statistical area”]*. Proof that locally produced compost was not available at the time of purchase or was cost-prohibitive shall be documented—including, if appropriate, by written confirmation from local providers—and included in the annual reports of *[insert names of municipal entities subject to policy]*.
- iii. *[insert names of quasi-governmental and/or semiautonomous entities]* and private entities are encouraged to purchase locally produced compost or compost from outside the region when it is available and not cost prohibitive.

**b. U.S. Composting Council Seal of Testing Assurance (STA) Program certified compost**

- i. *[insert names of municipal entities subject to policy]* shall, and *[insert names of quasi-governmental and/or semiautonomous authorities]* and private entities are encouraged to, purchase compost from U.S. Composting Council STA Program-certified compost manufacturers.<sup>30</sup>

- ii. Purchasers shall obtain technical data sheets from composting manufacturers detailing the test results for each compost shipment they receive. This information shall be kept on file and included in annual compost procurement reports.

Some local governments include language specifying a maximum amount of time that can pass between when the testing is performed and when the compost is used. For example, the [Washington State Department of Transportation's Compost Quality Specifications](#) (p. 9-112) requires submission of "a copy of the manufacturer's Seal of Testing Assurance STA certification as issued by the U.S. Composting Council dated within 90 calendar days of the application."<sup>31</sup>

## 6. Reporting

- a. *[insert names of municipal entities subject to policy]* shall compile annual reports, to be submitted to *[insert name of municipal office that oversees procurement or alternative entity]* on or before March 1, and that contain the following information:
  - i. the name of the *[insert names of municipal entities subject to policy]*;
  - ii. the volume of compost purchased throughout the year and total funds expended on compost;
  - iii. information about the source of the compost and proof of its STA certification;
  - iv. the end uses of the composted materials and proof of satisfaction of any quality specifications related to those uses;
  - v. the percentage of total materials purchased that consisted of composted materials; and
  - vi. recommendations for how to increase the percentage of purchasing composed of compost in the future.
- b. *[insert name of municipal office that oversees procurement or alternative entity]* shall review annual reports submitted by *[insert names of municipal entities subject to policy]* and track progress related to compost procurement throughout *[insert name of area governed by municipal entity issuing policy]*. This information will be made available to the public through regular reports on compost procurement and the state of composting in *[insert name of area governed by municipal entity issuing policy]*.

According to the [Urban Sustainability Directors Network](#), tracking and reporting requirements are useful for numerous reasons, including to "gain credibility with the community by demonstrating how the jurisdiction is 'leading by example,'" and to "identify opportunities for improving the jurisdiction's sustainable procurement program." Best practices include to "track the amount of your jurisdiction's 'sustainable spend,'" "track the types and quantities of sustainable products your jurisdiction purchased," and "communicate the measurable results of your jurisdiction's sustainable procurement activities" to residents, policymakers, and other stakeholders.<sup>32</sup>



ENDNOTES

- 1 Darby Hoover, Guide to *Composting at Sports Venues*, NRDC, March 2014, <https://www.nrdc.org/sites/default/files/sports-venue-composting-guide.pdf>. Institute for Local Self Reliance, “Benefits of Composting,” March 28, 2010, <https://ilsr.org/benefits-of-composting/>. John Stutz, Sara Donahue, Erica Mintzer, and Amy Cotter, *Compost in Landscaping Applications*, U.S. Environmental Protection Agency, May 2003, <https://archive.epa.gov/wastes/conservation/tools/greenscapes/web/pdf/compost.pdf>. Soils for Salmon, “Soils for Salmon: Building Soil,” accessed May 18, 2021, <https://www.soilsforsalmon.org/>. Washington State Legislature, Use of Compost Products in Projects, § 43.19A.120 (2020), <http://app.leg.wa.gov/RCW/default.aspx?cite=43.19A.120>.
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