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October 12, 2026

The Honorable Marc Elrich
County Executive, Montgomery County
101 Monroe Street, Second Floor
Rockville, MD 20850

The Honorable Natali Fani-González
President, Montgomery County Council
100 Maryland Avenue, Sixth Floor
Rockville, MD 20850

Montgomery County Councilmembers
100 Maryland Avenue, 6th Floor
Rockville, Maryland 20850

SUBJECT: Rockville Comments on Long-Term Solid Waste Management Alternatives

Dear County Executive Elrich, Council President Fani-González and Montgomery County Councilmembers:

The City of Rockville (City) appreciates the opportunity to supplement our May 5, 2026 letter outlining our priorities for the County's long-term solid waste system. Since that time, the County Council has held a series of work sessions and public meetings, and the Mayor and Council received the first briefing from the Montgomery County Department of Environmental Protection (DEP) on October 5, 2026. We have requested the County's continued consideration of additional analysis, diverse perspectives, and robust discussion as it deliberates this complex decision. While the County's presentations have included potential impacts to other jurisdictions adjacent to proposed landfills, the briefing materials should also include greater depth and analysis on the impact to neighboring jurisdictions, such as Rockville, Shady Grove communities, Gaithersburg, and Washington Grove.

The City has significant concerns about the potential impacts of the proposed changes at the Shady Grove Transfer Station on neighboring communities, particularly alternatives that would replace the existing rail-based system with long-haul trucking. While evaluating the future of the Resource Recovery Facility (RRF) is necessary, that evaluation should consider the full range of service needs, as well as the environmental, transportation, financial, equity, and community impacts. Replacing a functional, reliable, and efficient rail-based system with increased reliance on long-haul trucking, including the potential transportation of waste to an out-of-state landfill, could represent a significant step backward for regional environmental sustainability, transportation, and equity goals.

The County's *Comprehensive Solid Waste Management Plan 2025-2034* references a policy to minimize solid waste-related traffic on County roads. The County developed the dedicated rail-haul system in 1995 in large part to reduce substantial waste truck traffic through communities. That infrastructure represents a substantial public investment and provides significant system-level benefits, including the ability to move large volumes of waste cost-effectively while reducing the burden of waste-related traffic on local and regional roadways and helping to reduce greenhouse gas emissions.

The *Shady Grove Sector Plan* also recognizes the continued importance of the processing facility and transfer station at the location, in part because the facility can use the existing rail infrastructure. The Plan does not anticipate relocating the facility to another part of the county, but calls for mitigation of environmental impacts. The plan

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also projects growth in this area; therefore, the County has a responsibility to ensure that changes to solid waste operations do not compound existing environmental, transportation, noise, or quality-of-life impacts for current and future residents.

We have heard from Rockville residents, and they reinforce the concerns raised at the September 2nd community meeting hosted by Councilmembers Katz and Luedtke. Adjacent communities have already expressed concern with odors, noise, truck traffic, and roadway impacts under current operations, and they have significant concerns that these problems will be exacerbated by a transition to long-haul trucking. With more than 2,000 people living within ½ mile of the Transfer Station and projected population growth, those concerns warrant full and comparable consideration alongside the concerns raised by residents surrounding the RRF. A transition in the County's solid waste system should not simply shift environmental, transportation, or quality-of-life impacts from one community to another.

The City is particularly concerned about the *cumulative* impacts of the proposed changes at the Shady Grove Transfer Station on surrounding communities. The County has indicated that the future system could include a transition from rail to long-haul trucking, the construction of an advanced waste processing facility (AWP), and modifications to existing composting operations, but has not yet provided a comprehensive plan showing how these changes would work together or affect surrounding communities. Before making such a significant change, the County should develop a comprehensive plan with sufficient information on proposed locations, systems, processes, and operations to evaluate cumulative community impacts. The County should also engage directly with neighboring communities early in the planning process to identify potential impacts and develop meaningful mitigation measures and improvement plans before final decisions are made.

The City is not asking the County to preserve or close the Resource Recovery Facility (RRF) at this time. Rather, the City is asking the County to demonstrate that any system that replaces or supplements the RRF is fully planned, cost-effective, reliable, resilient, and protective of affected communities before an irreversible transition is made. Accordingly, before selecting a preferred alternative or taking actions that would foreclose continued use of the existing rail infrastructure, we respectfully request that the County complete and publicly present the following:

1. **Comprehensive Shady Grove operations and transportation analysis**. A comprehensive transportation analysis should account for all planned capital improvements and operational changes at the Shady Grove Facility and Recycling Center so that cumulative impacts are evaluated. The analysis should reconcile truck-volume estimates from cumulative changes at the facility; identify expected inbound and outbound truck movements by hour and vehicle type; evaluate truck queuing, noise, odor, and staging requirements; determine whether the facility can accommodate projected operations without unacceptable congestion; and examine impacts on Shady Grove Road, Route 355, I-370, I-270, and other affected roadways and intersections.

2. **Defined location and a timeline for advanced waste processing (AWP) and truck loading operations**. If advanced waste processing is pursued, the County should identify the proposed location, the type of mechanical, chemical, or biological treatments involved, and the timeline for operations. Residents adjacent to the Transfer Station, such as King Farm and Shady Grove adjacent communities, have already shared concerns about putrid odors and noise from current transfer operations and have significant concerns that adding a facility to process raw municipal waste at this location and tractor-trailer loading and hauling of the waste will further exacerbate conditions. In addition, the proposed 3 a.m. start time for hauling operations raises concerns about sound disturbances to adjacent communities, particularly given the absence of plans for a sound wall or other mitigation measures. Furthermore, the proposed transition from covered rail cars to trucks using tarp covers raises further concerns about increased odors. These potential impacts warrant careful consideration and effective mitigation measures to protect the health and quality of life of nearby residents.

Comprehensive contingency plan. The County's solid waste system provides an essential daily service that must be resilient to a range of operational disruptions. Under the current rail system, trucks provide a backup when rail is disrupted. For the proposed long-haul operations, the County should demonstrate a contingency plan to maintain uninterrupted service during disruptions caused by snow and ice on local and regional roads, regional transportation disruptions, equipment failures or other unforeseen events.

3. **Transparent lifecycle cost, equity, and environmental comparison**. Residents and municipal governments should be able to easily compare the full costs, environmental effects, service benefits, and equity impacts of each alternative. Equity impacts should consider communities by the Transfer Station as well as the RRF and proposed landfills. These costs and impacts should be evaluated over comparable long-term time periods using clearly identified assumptions. The analysis should also identify the projected effect of each alternative on County base system benefit charges, tipping and disposal fees, and the costs borne by municipal solid waste programs and their residents.

4. **Engagement and protections for surrounding communities**. Further engagement with communities, such as King Farm, the Farmstead, and The Reed, is needed for this critical decision. Any proposal that increases operations at Shady Grove should include mitigation measures and enforceable actions addressing hours of operation, truck routing, noise, odor, lighting, litter, air quality, roadway maintenance, pedestrian and bicycle safety, emergency access, enforcement, and ongoing monitoring. The County should also establish a process through which nearby communities can review actual operational impacts after implementation and identify appropriate corrective measures.

5. **Formal consultation with Rockville regarding operating changes, mitigation, and improved services**. Recognizing that the County's solid waste system directly affects residents, transportation networks, development plans, and municipal recycling and refuse services, Rockville should have a meaningful opportunity to partner in this process. We understand that at least one Rockville resident has applied to serve on the County's Solid Waste Advisory Committee (SWAC), and we hope you look favorably upon including a representative from our municipality. The County should also collaborate with Rockville to develop appropriate mitigation measures and opportunities to improve services. Finally, Rockville strongly supports upgrades to Montgomery County's recycling facility that would provide the flexibility to accept single-stream recycling and food scraps and other compostable materials from municipal programs. These upgrades could provide significant benefits to Rockville residents by expanding and simplifying recycling and organics management options to advance the County's zero-waste goals.

A successful next-generation waste system should not simply relocate environmental, transportation, financial, or quality-of-life impacts from one part of Montgomery County to another. It should reduce the County's overall waste stream, provide reliable and resilient disposal capacity, protect communities throughout the County, and establish a sustainable solid waste system capable of serving residents for decades.

The City of Rockville stands ready to work collaboratively with the County Executive, County Council, County departments, and affected communities toward that goal.

Sincerely,



City of Rockville Mayor and Council

cc: Jennifer Macedonia, Director, Department of Environmental Protection (DEP)
Jeff Seltzer, Deputy Director, Department of Environmental Protection
Willie Wainer, Chief, Recycling and Resource Management Division, DEP
Kaley Laleker, Chief, Zero Waste Programs, DEP
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