

**CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION**

**c/o Department of Environmental Services  
2100 Clarendon Blvd., Suite 705  
Arlington, VA 22201**

November 27, 2023

Honorable Christian Dorsey  
Chair, Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

Re: Draft Solid Waste Management Plan

Dear Chair Dorsey:

The Climate Change, Energy and Environment Commission (C2E2) has reviewed the draft Solid Waste Management (SWM) Plan approved for public sharing by the Solid Waste Committee on September 21, 2023. We wish to commend the Solid Waste Bureau staff on the quality of the document and the thoughtfulness with which it presents ways to expand and improve on the current waste management system as well as introduce voluntary zero waste measures. C2E2 recognizes that solid waste management is a complex challenge over which the County has limited control. Nevertheless, we have suggestions on how the document might be more forthcoming with Arlington residents about the current state of waste management and recycling within Arlington and nationally and its implications for climate and the environment and more comprehensive, focusing on reducing waste first and foremost, or at least as much as on ‘recycling right.’

C2E2 understands that the Plan is organized into two parts: one that fulfills Virginia’s regulatory requirements, and another that proposes voluntary measures to advance the County’s 2015 Zero Waste Resolution goal of 90 percent waste diversion from landfill and incineration by 2038. In establishing this scope, the Plan is responsive to State and County requirements but misses a crucial opportunity, as noted above, to address the County’s solid waste management practices in a comprehensive and ambitious fashion that better reflects Arlington residents’ desire for its community to be a climate and sustainability leader.

C2E2 has the following suggestions on how the draft Plan can be improved:

**Expand the Scope to More Robustly Promote Waste Reduction**

While the draft Plan effectively describes Arlington County’s current waste and recycling efforts and establishes an ambitious Zero Waste goal, it relies heavily on the fact that current efforts are already exceeding state requirements – at least according to the formula the State provides to calculate success – tonnage recycled (further on this below). For planning purposes, to meet the state mandate, projected per capita waste generation is held constant and zero waste targets focus

on improving diversion rates by “recycling right” more than by tapping into the larger potential of waste reduction.

We appreciate that among the Zero Waste measures presented, the Plan gives highest priority to public education. However, among these education efforts we suggest a relative shift in emphasis toward education on waste reduction measures as ultimately holding much greater potential than additional education on the use of current systems. The draft Plan itself acknowledges (p. 46) that waste reduction and reuse “prioritize the highest tier of the Virginia DEQ and U.S. EPA waste management hierarchy” and that “(m)any opportunities exist for waste reduction, including **material donation and reuse, which represents the most significant opportunity in solid waste management to conserve resources, reduce costs and protect the environment.** Residents and businesses must rethink their purchasing practices to shift away from disposable products to reusable and durable materials that can be donated or reused.”

Overall, the Plan forecasts a much smaller potential diversion from “Waste Reduction and Material Donation/Reuse Education Campaigns” – 3.0-3.7 percent – than for education on existing systems at 14.2-16.5 percent, but we believe this is because this enhancement is not being tackled ambitiously enough. As currently drafted, this public education effort comprises only multimedia campaigns and makes no mention of possible dialogue with key sectors like Construction (see next paragraph) as peer jurisdictions have successfully done (e.g., Seattle and King County, WA<sup>1</sup>). The waste diversion percentage that could result from a more ambitious version of this enhancement, if it included construction and demolition waste for example, could be significantly larger.

C2E2 also endorses the Plan’s recommendations to support state and federal legislations that would shift responsibility for waste management to producers and enhance the ability of communities and consumers to reduce waste. Such legislation could include extended producer responsibility laws, bottle bills, right-to-repair laws, and greater authority for local jurisdictions to limit hard-to-recycle single use products. Such laws would address many of the waste management issues we face at their source.

### **Enhance Efforts to Improve Performance in Key Sectors**

Across the country, **Construction and Demolition (C&D)** waste represents around a third or more of total waste streams, yet Arlington’s draft SWM plan doesn’t mention the tonnage or the share it represents as part of our waste stream. It also doesn’t mention its composition. As there are no authorized C&D disposal sites in Arlington, almost all C&D waste is disposed of outside the County and no reporting from these sites goes to Arlington. The Plan states on page 27 that: “Although commercial haulers report tonnages to the County, neither the County nor the private waste companies keep data on the C&D composition.” The SWB itself has reported that tonnage reporting can also be spotty.

While the Plan says on page 27 that “(t)he County requires that developers commit to recycling as much of their C&D waste as possible,” it is unclear to what degree this happens. The minimal

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<sup>1</sup> City of Seattle’s [2022 Solid Waste Plan Update: Moving Upstream to Zero Waste](#), p. 4; and EcoAction Arlington Zero Waste Webinar, January 17, 2023.

discussion of C&D waste in the Plan results in something of an “out of sight, out of mind” phenomenon as regards to this significant waste source, somehow absolving the community of responsibility for its improved management. By contrast, the City of Baltimore reports in its SWM plan that C&D waste represents 35 percent of its overall waste stream, offers data on its composition, and presents options for reducing the share C&D represents of its total waste stream.<sup>2</sup>

At a minimum, Arlington County should consider assessing these tonnages periodically and requesting details from the developers about composition to determine whether they are significantly contributing to the County’s generation of waste materials. The County could glean additional data from participants in Arlington’s Green Building Incentive Program who frequently opt for LEED points for ‘diverting up to 75 percent of C&D waste from landfills.’ The County could also better measure this latter going forward.

The SWM Plan treats **Arlington Schools** as another commercial entity in its waste management policies, and APS is only mentioned in the Voluntary Enhancement section of the Plan in a weakly-worded, longer-term diversion enhancement titled “Incorporate Zero Waste Principles in County and Arlington Public School (APS) Operations.” If this were to be a truly “whole of government” effort, APS would be fully and robustly included in this Plan. Challenges faced by APS in managing food waste and recycled materials are well-known and opportunities exist for collaboration to reduce waste streams in the schools and improve diversion of recyclables and food waste.

The Plan makes clear that **Multi-family Housing** waste management and recycling performance is the poorest of the three sectors and presumably thus presents the greatest opportunity for improvement. Yet, the Plan doesn’t communicate a well-developed strategy to this effect. While the County doesn’t provide collection services to this sector – private haulers do – it needs to dedicate significantly more attention to improving the education of MFH residents and performance of the overall systems. Ideally, the Plan would state that the County will direct and resource the SWB to engage more vigorously with MFH residents and property managers and come up with ways to incentivize the sector to perform better.

The following are some actions and tools the Plan could include for these and other key sectors to strive for a truly ambitious zero waste plan that puts waste reduction at its core:

- Enhance reduction and diversion of construction waste requirements in the updated Green Building Incentive Policy
- Work with APS to shift to reusable dishes and utensils, reduce packaging of food served to students, and introduce composting in school cafeterias
- Work with multi-family housing to streamline and improve their recycling practices
- Establish policies within Arlington government operations to reduce or eliminate single-use plastics and require deconstruction and recycling of County-owned buildings, including homes purchased for stormwater relief, when being removed

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<sup>2</sup> [City of Baltimore Recycling and Solid Waste Management Master Plan](#), July 28, 2020 (p. 23)

- Engage large institutions, such as hospitals and nursing homes, to use more reusable items to reduce their waste, and stores to offer refill options
- Establish an innovation fund (perhaps through a Green Bank) for entrepreneurs who wish to set up businesses that support reuse and a circular economy such as reusable carryout container services
- Encourage or require the use of reusables or compostables for large County events such as the County Fair, going beyond requiring ineffective recycling bins and signage
- When introducing the per capita waste figure, note that this larger-than-pre-pandemic figure is being used to be conservative for planning purposes, but that the Plan's aim through its enhanced waste reduction efforts is to contribute to a decrease in this figure over time, something the SWB will track

Even when it is not possible for the County to issue directives or regulations to achieve the above, the Plan should state that the SWB or other responsible office will be better resourced to dialogue with these key stakeholders – appealing to a sense of our shared obligation to the future to do so.

### **Fully Address Climate Implications of County's Waste Generation and Disposal**

The most glaring omission perhaps in this document is the failure to highlight the serious climate and environmental impacts that our current practices of produce, consume and dispose create. To put it simply, Arlington's waste streams have a high carbon footprint and contribute to widespread environmental degradation. The following are two examples:

- Nationally, 30 percent of the food supply is wasted (fda.gov), representing about 6 percent of our total GHG emissions, a misuse of valuable land and water resources, and a portion of the pollution generated by current agricultural practices.
- Single-use plastics generate an estimated 3.4 percent of GHG emissions and pollute our air, water, and soil throughout their life cycles – including recycling, and the toxic chemicals they contain present a threat to human health, particularly of low income, marginalized populations. Despite decades of recycling campaigns, plastic pollution continues to grow.

C2E2 realizes that the GHG emissions calculated using the U.S. EPA Waste Reduction Model only includes emissions from managing solid waste as it enters the MSW system and not those embodied in the production and manufacture of products (p. 45). However, we recommend that the SWB estimate the embodied carbon in the waste stream to raise Arlingtonians' awareness about the magnitude of the cost to the environment of consuming and disposing beyond our needs.

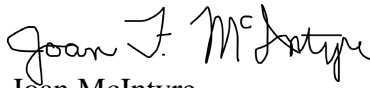
### **Critically Examine Arlington's Recycling Rate Against its Audit Outcomes**

The draft SWM Plan suggests that Arlington's recycling rate is well above the State norm at 49 percent. However, this rate is calculated – as the State directs – based on simple tonnages that recycling contractors report, and it doesn't reflect the fact that audits show a high percentage Arlington's recycling haul like many jurisdictions is contaminated and thus much of it likely

ends up in the incinerator or landfill. Since 70 percent of Arlington residents live in multifamily housing, and as the ‘contamination’ rate of MFH recycling is the highest, Arlington’s effective recycling rate is much, much lower – something that should be very concerning to our community. The draft Plan could acknowledge this and be more transparent about how much further we, as a community, need to go to be more sustainable.

In conclusion, C2E2 commends the authors of the draft Plan for establishing a lofty goal and making a strong start toward improving Arlington County’s waste disposal systems. However, the Plan adopts a narrative that emphasizes the systems and processes that are already in place, and over which the County has direct control, at the expense of digging deeper to find areas where change is harder. We encourage the County to seize the opportunity to address this issue more comprehensively, shifting the focus to waste reduction with aspirational goals to better align with our climate and zero waste goals.

Sincerely,



Joan McIntyre

Chair, Climate Change, Energy and Environment Commission

CC:

Members, Arlington County Board

Mark Schwartz, Arlington County Manager

Bill Eger, Chief Climate Policy and Coordination Officer

Erik Grabowsky, Chief, Solid Waste Bureau