



December 1, 2023

The Honorable Christian Dorsey, Chair
Arlington County Board
2100 Clarendon Boulevard, Suite 300
Arlington, VA 22201

RE: Comments on the Draft Solid Waste Management Plan

Dear Chairman Dorsey and members of the County Board:

Thank you for the opportunity to comment on the draft Solid Waste Management Plan (SWMP). Overall, the plan lacks a focus on the environmental consequences of our waste stream and overemphasizes recycling while downplaying the need to prevent waste from being generated in the first place (i.e., reduce and reuse). Arlington's efforts to reduce its solid waste are key to our community's environmental goals and will play an important role in reducing the County's carbon footprint. Recycling alone is not sufficient. This letter relays our overarching concerns with the SWMP and offers substantive recommendations.

Climate and Environmental Costs

Arlington's waste streams are tightly connected with environmental damage and the changing climate, yet the SWMP does not make this important connection. In the US, 30 percent of the food supply is not eaten and discarded ([usda.gov](https://www.usda.gov)). Food decaying in landfills or burned in waste-to-energy facilities is a potent contributor to GHG emissions and produces other hazardous substances. Wasted food contributes to about 6 percent of our total national greenhouse gas (GHG) emissions and represents a misuse of valuable land and water resources.

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. Toxic chemicals present a threat to human health, particularly for low-income communities and communities of color that are more often located near waste incineration or toxic waste sites ([Urban Institute](#), [Energy Justice Institute](#)). Despite decades of recycling campaigns, plastic pollution continues to grow. ***We strongly urge that the County***



estimate the embodied carbon in the waste stream to raise Arlingtonians' awareness about the magnitude of the cost to the environment by consuming and disposing beyond our needs.

Waste Reduction Targets

Arlington's SWMP does not delineate strong goals for reducing waste. Instead, the plan focuses on recycling, which is not the silver bullet to waste reduction. After all, materials can only be recycled so many times before they become trash. While the draft SWMP mentions waste reduction on the waste hierarchy, the only forecast is for per capita waste generation to remain steady at almost 5 pounds (a conservative, business-as-usual approach to meet state planning requirements). While the plan notes that the County does not measure the source reduction efforts of private citizens, it can incorporate aspirational scenarios using waste generation in other developed countries as benchmarks. For example, according to the [Global Waste Index 2022](#), per capita waste generated in Japan was about 2 pounds per day and just under 4 pounds per day in Germany. The plan should also specify how waste reduction would be counted toward the ultimate zero waste objective of 90 percent diversion as outlined in the County's 2015 Zero Waste Resolution.

The Voluntary Program Enhancements identify a number of actions promoting reduction opportunities but focus largely on diversion of the waste stream to meet the 2038 goal. Moreover, the estimated impact of potential reduction efforts is minimal, potentially understating the impact such efforts could have if fully and broadly implemented. The SWMP rightly notes that behavioral changes are a crucial component of achieving the goals as are federal and state legislation shifting more of the burden to producers and substantial changes in how products are designed and packaged.

The plan can be enhanced by expanding on how, with encouragement and support, initiatives could potentially reduce waste within specific sectors, using examples of other jurisdictions both nationally and globally and emerging private entrepreneurship. Arlington could consider establishing an innovation fund (perhaps through a Green Bank) for entrepreneurs to set up businesses that would support reuse and a circular economy, such as for reusable carryout containers at restaurants. The County could also consider working with state initiatives such as the Virginia Green Travel Association (which certifies and promotes businesses reducing waste). EcoAction Arlington's Green Dining program is already partnered with this organization and could help to build connections.

Specific Shortcomings

Construction and Demolition Materials. The SWMP's discussion of construction and demolition materials highlights its deficiencies. The tonnage and composition of the



construction and demolition waste are not included, and there are no specific targets for reducing this waste, despite teardowns and renovations being so common in Arlington. ***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.*** One potential source of new information is participants in Arlington's Green Building Incentive Program.

Multi-Family Residential and Commercial Institutions. We appreciate that the SWMP addresses multifamily residential (MFH) and commercial waste management and recycling performance as key areas for improvement. However, the plan understates the extent of the challenge given that the County's audit data for MFH suggest that over 50 percent of reported recycling consists of trash or organics. Moreover, specifics about how to make improvements in these areas—beyond providing technical assistance—are lacking. The plan misses an opportunity to more directly partner with and incentivize multifamily residential and commercial institutions to recycle appropriately, reduce waste, and expand organics diversion. Along with enforcing its policies around recycling within multifamily and commercial institutions, Arlington County can consider expanding these policies to require or incentivize composting.

Arlington Public Schools (APS). Another weakness in the SWMP is its stance toward Arlington Public Schools (APS), which it treats as just another commercial entity in its waste management policies and only mentions in its Voluntary Enhancement section. Such a categorization fails to reflect the vital "whole of government" approach that guides the SWMP. ***APS has a long history of waste stream reduction problems, and focusing on schools could bear fruit by allowing Arlington to reduce its overall waste.*** Arlington County should work with APS to shift to reusable dishes and utensils, reduce the packaging of food served to students, and introduce composting in school cafeterias.

Education and Partnerships

As currently drafted, the public education effort comprises only multimedia campaigns and makes no mention of possible dialogue with key sectors like construction as peer jurisdictions have successfully done (e.g., Seattle and King County, WA¹). The waste diversion percentage that could result from a more ambitious education and partnership effort (for example, if it included construction and demolition waste) could be significantly larger. Arlington County has a "Where Does it Go" part of its website but could do more to enhance and maintain this online resource and advertise to citizens that it exists.

Moreover, other jurisdictions are using the insights from behavioral science to communicate with individuals how to "recycle right" and compost correctly. Efforts that

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



result in lasting change need to address an individual's motivation (willingness to act), opportunity (having the tools needed to act - e.g., the bins), and ability (skills about what to do). The County can take steps to help consumers help the County in meeting its goals. For instance, EcoAction Arlington marks storm drains to remind citizens that what flows off the street drains into the Potomac River. A similar approach might be applied to directly mark County collection bins with a clear description of where materials go, as well as the related impact. This would be an opportunity to provide motivation and reinforce what to do. As a starter idea, this might include messaging (directly applied to bins) that simply states: For Black bins "Burned. Trash only. Costs you and the County"; for Blue bins: "Recycled. Some value for the planet"; for Green bins: "Composted. Better for the planet." This combined with a campaign to promote the wasted food scale - e.g., "Eat food first; compost second" might go a long way to helping Arlingtonians and the County achieve their shared goals.

Another opportunity could be a partnership with the healthcare sector. For example, the County could engage large institutions, such as hospitals and nursing homes, to use more reusable items to reduce their waste.

County Government Buildings

Arlington County can lead by example through policies within the 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. The County should also encourage or require the use of reusables or compostables (along with collection stations for compostables) for large County events such as the County Fair, going beyond requiring ineffective recycling bins and signage.

In conclusion, EcoAction Arlington applauds the draft SWMP for its strong start toward improving Arlington County's waste disposal systems. However, the plan leans heavily into erroneous assumptions and makes several large omissions that could jeopardize the County's ability to meet its waste reduction and climate change goals. We encourage Arlington to rethink its relationship with waste and strive to be a leader in reuse and circularity by adopting the above recommendations to improve the plan and keep Arlington on track.

Sincerely,

Jenn Yates, Chair, EcoAction Arlington Board of Directors
Elenor Hodges, Executive Director, EcoAction Arlington

cc: Mr. Matt de Ferranti, Arlington County Board
Ms. Libby Garvey, Arlington County Board
Mr. Takis Karantonis, Arlington County Board



Ms. Tannia Talento, Arlington County Board