

**DC Environmental Network • Anacostia Riverkeeper • Anacostia Watershed Society
Center for Biological Diversity • Clean Water Action • DC Environmental Health Collaborative
DC Smart Schools • DC Statehood Green Party • Earthjustice • Friends of the Earth • Global Bees
Global Green USA • Green Cross International • Institute for Local Self Reliance
Potomac Riverkeeper • Safe Lawns for DC Kids and Critters • Sierra Club D.C. Chapter
Sustainable Community Initiatives • Washington Parks & People**

January 25, 2013

Via email: vcg6@dc.gov.

The Honorable Vincent Gray
Mayor of the District of Columbia
1350 Pennsylvania Avenue, NW, Suite 316
Washington, DC 20004

RE: Planning for Zero-Waste without Incineration

Dear Mayor Gray:

As representatives of the environmental community in DC, and of the Sustainable DC Working Groups and public engagement process, we support developing zero-waste strategies that make sense for the District. We oppose the use of Sustainable DC funds to study incineration within DC as a waste management option, as this technology is not sustainable and does not align well with Sustainable DC goals.

Background:

On January 3rd, the DC Environmental Network (DCEN) hosted a well-attended brown-bag lunch with over 60 people, representing over 30 organizations and government agencies and offices, to discuss a study that the Department of Public Works (DPW) will undertake with funds allotted to them through Sustainable DC. As stated in your press release:

“The Department of Public Works (DPW) was awarded \$300,000 to study the costs and benefits of establishing a waste-to-energy conversion facility within the District.”

While there are many technologies that can be used for waste-to-energy conversion, there is deep concern within the environmental community that the study intends to investigate opportunities for construction of an incinerator in DC. Building an incinerator within DC is an inappropriate and unacceptable solution to our waste management challenges for many reasons including (partial):

- Large central incineration plants require large quantities of municipal solid waste (MSW) as feedstock. Such a facility could only succeed if we fail to meet Sustainable DC’s ambitious zero-waste goals.
- The likely locations for a large incineration facility are limited and in areas with high poverty rates, raising health and environmental justice concerns. Even those incinerators that strictly comply with emission standards still emit toxic and carcinogenic pollutants including arsenic,

lead, mercury, and dioxins. District families are already exposed to more toxic pollution than is safe or right, without the added burden of an incinerator in close proximity to the places where they live, work, and play.

- The city cannot afford the capital or operating cost of this form of waste-to-energy, and therefore should not be studied at all.

At the DCEN meeting, Hallie Clemm of DPW clarified to the group that the parameters of the study had not yet been defined and that other waste-to-energy technologies, such as anaerobic digestion, might be considered. However, she also suggested that building our own high-capacity incineration facility was on the table as an alternative to renewing DC's contract with the Covanta incineration facility in Lorton, VA. This sentiment was not reflective of the Sustainable DC Waste Working Group's recommendations. The final wording on the related action item drafted by that working group follows:

"The District shall form a task force to explore waste-to-energy and waste conversion technology options outside of incineration / mass burn for the District by 2013. The task force must take into consideration decreased C&D waste levels (i.e. less wood will be available) driven by another line item."

Our Position:

As representatives of the environmental community in DC, and of the Sustainable DC Working Groups and public engagement process, we request that the Mayor's Office work to ensure that Sustainable DC funds support studies and programs that further Sustainable DC goals.

Participants in our discussion were strongly opposed to local incineration and felt that it would be a waste of money to study the costs and benefits of such a facility. It was clear that the pursuit of a central incineration facility would spark a long legal battle and face fierce opposition. Instead, panelists and participants suggested that we direct funding to pilot programs that improve recycling and diversion rates and bring us closer to zero-waste.



We ask that the Mayor's Office revise the conditions of the DPW award to stipulate that funds must be used to develop a comprehensive zero-waste strategy and/or design programs that bring us closer to that goal. Thank you for your attention to this matter.

Sincerely,

Chris Weiss
Executive Director
**DC Environmental Network
& Sustainable DC Green Ribbon
Panel Participant**

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Cc: DC Council, Allen Lew, Warren Graves, Harriet Tregoning (OP), Bill Howland (DPW), Keith Anderson (DDOE), Hallie Clemm (DPW), Brendan Shane (DDOE), Mary Lynn Wilhere (DDOE), Chris Murphy (EOM)