



Government of the District of Columbia Advisory Neighborhood Commission 4B

By Electronic Mail

September 28, 2022

Michael A. Carter, Interim Director
District Department of Public Works
2000 14th Street, NW
Washington, DC 20009

Blake Adams, Manager
DC Office of Waste Diversion
District Department of Public Works
2000 14th Street, NW
Washington, DC 20009

RE: Providing Feedback on the District Department of Public Works (DPW) Office of Waste Diversion's Zero Waste DC Plan Draft Framework

Dear Interim Director Carter and Manager Adams:

Advisory Neighborhood Commission 4B, at a duly noticed public meeting, with a quorum being the "majority of the total number of commissioner positions currently filled in Commission 4B," at its September 28, 2022, meeting voted with _ Yeas, _ Nays, and _ Abstentions to send this letter providing feedback on the District Department of Public Works (DPW) Office of Waste Diversion's Zero Waste DC Plan Draft Framework.

DPW's Office of Waste Diversion is seeking feedback from the public on the Zero Waste DC Plan Draft Framework. The Plan is designed to reach the goal of diverting 80 percent of the District's waste away from landfills and incineration by 2032, as introduced in the [Sustainable DC Plan](#) and codified into law through the [Sustainable Solid Waste Amendment Act of 2014](#). Based on the most recently reported data in 2018, [DC's waste diversion lags regionally and nationally](#), and has likely struggled even more due to the [impacts of the Covid-19 \(coronavirus\) pandemic](#). The Zero Waste DC Plan Draft Framework will be crucial for DC's dedication toward clean and healthy neighborhoods, sustainability, and environmental justice.

Advisory Neighborhood Commission 4B previously weighed in regarding [DC's litter collection and zero waste efforts](#) (attached) and provides these preliminary comments in response to the Zero Waste DC Plan Draft Framework. The Commission has focused broadly on the Draft Framework's seven goals: reduce per capita waste generation; transition from single-use towards re-use; increase recycling and composting participation and accessibility; build an inclusive and local circular economy; increase education and enforcement community-wide; and protect the environment for a cleaner DC. The Commission intends to weigh in as to specific language in the Draft Framework during the second public comment period.

Environmental Justice

Advisory Neighborhood Commission 4B encourages inclusion of a goal focused expressly on environmental racism and justice. The impacts of [environmental pollutants are disparately felt across the District](#), heavily impacting communities in Wards 8, 7, and 5 and public housing residents. The [concentration of industrial pollutants](#) is rooted in racist land use and zoning policies, worsened by decades of chronic disinvestment in government services – things like waste collection, litter prevention, and green space – that might otherwise help mitigate the impacts. Correcting for longstanding disinvestment and racist practices that have worsened environmental impacts requires an express goal of environmental justice.

Equity

Advisory Neighborhood Commission 4B encourages reviewing all of the Draft Framework's goals and actions to consider equity. Equity is relevant to access to government services, like trash, recycling, and compost collection, as well as siting of resources like water fountains, donation sites, and zero waste hubs; the impact of financial incentive systems like save-as-you-throw and plastic bag fees; and enforcement, including for dumping (which should be targeted to corporations, developers, and property owners over individuals). Language access can also impact equity. Each component of the Draft Framework should hold equity at its core and strive to correct for longstanding disinvestment and inequities in DC. The Commission believes review of the Draft Framework should take place in coordination with the District Office of Racial Equity.

Serving Residential Buildings with 4+ Units

Advisory Neighborhood Commission 4B has observed challenges with regard to trash and recycling services and collection for residential buildings with 4+ units. The lack of certain services (including bulk collection), as well as the lack of enforcement for services that property owners should provide (including trash and recycling collection), has created a system that substantially favors homeowners. The tax credit provided to owners of multi-family residences does not approach the true cost of providing these services in a free market, which contributes to cost-cutting in service providers by multi-unit property managers. These challenges also appear to contribute to public dumping and what the District Department of Public Works has characterized as "misuse" of public trash cans for household trash. The Draft Framework should

consider expanding services to include residential buildings with 4+ units and/or efforts to bring these services to residents at these buildings.

Public Trash Cans

Advisory Neighborhood Commission 4B supports efforts to improve and expand public trash cans and collection to address litter and considers these essential public services. The Commission also appreciates that residents often seek to place litter within cans as opposed to littering and filling the District's streets with more trash (possibly as the result of lack of or insufficient services within residential buildings with 4+ units). Yet, the Commission has observed government removal of public trash cans based on "misuse," *i.e.*, household trash. This practice is inconsistent with the goals of the Draft Framework and should be addressed within the Draft Framework. Public trash cans and trash collection are a public service: If public trash cans are overburdened, the Commission would like to see additional public trash cans, changes in trash can design, and more frequent collection, and not the removal of public trash cans or reduction in collection.

Recycling Election Materials

Election materials – palm cards, lamppost signs and zip ties, yard signs and stakes, and stickers and buttons – are a substantial contributor to waste in DC and are not part of any comprehensive program to encourage recycling or even improved materials that would make recycling or reuse easier. The District Department of Public Works should consider mechanisms to encourage use of campaign materials that are more easily recyclable, education about the most zero-waste friendly campaign materials, and programs that might facilitate coordination of recycling of campaign materials among campaigns.

Advisory Neighborhood Commissioners & Public Spaces

Advisory Neighborhood Commissioners are an ally in the District's zero waste goals, whether they are hosting community cleanups, coordinating neighborhood events, or sharing information about government services and resources. The District Department of Public Works should consider how best to work with Commissioners, as well as Main Street programs and community associations, to further zero waste efforts. Using public library, public recreation, and public school facilities and working with those agencies' staff would also ensure that information reaches residents through channels that are open to and inclusive of all District residents.

The Commission also voted with _ Yeas, _ Nays, and _ Abstentions to appoint the Commissioner for Single Member District 4B02, Erin Palmer, or any member of the Executive Committee in their absence, to be authorized to communicate this letter and represent Advisory Neighborhood Commission 4B in communication with your agency regarding this matter.

Sincerely,

Erin Palmer, ANC 4B02 Commissioner

cc: Celeste Duffie, Community Relations Specialist, District Department of Public Works
Sarah Hofman-Graham, Program Analyst, DC Office of Waste Diversion, District
Department of Public Works

Councilmember Mary Cheh, Chair, Committee on Transportation and the Environment
Michael Porcello, Legislative and Committee Director, Committee on Transportation and
the Environment

Andrew Grinberg, Legislative Assistant, Committee on Transportation and the
Environment

Councilmember Janeese Lewis George (Ward 4)

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