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Interim Director Christine Davis
District of Columbia Department of Public Works
Franklin D. Reeves Municipal Center
2000 14th Street NW
Washington, DC 20009

Dear Director Davis:

As you know, last fall I asked your Agency to conduct an assessment of the health, environmental, equity, and financial implications of the District's waste disposal at the trash incinerator in Lorton, VA ("Covanta Fairfax"). I am pleased that the Agency has proceeded with such an assessment, and I thank you for sharing the proposed methodology plan for the study with my office. I write to raise some specific concerns I have about the proposed methodology, in particular where it does not appear to adequately address the considerations outlined in my October 19, 2020, letter.

First, I have concerns with how you propose to assess the greenhouse gas implications of incineration and landfilling. In my letter, I asked you to consider whether use of the Covanta Fairfax facility is consistent with our clean energy goals. Advocates for incineration argue that incinerators produce energy that contributes to the electric grid, displacing the use of fossil fuels and coal, resulting in net greenhouse gas reductions. But as I noted in my letter, this is not the case at Covanta Fairfax. Because Covanta Fairfax is permitted to sell renewable credits into Maryland's renewable energy portfolio (which includes incineration as a tier one renewable energy source), much of the energy produced at the facility displaces clean renewable energy, likely wind, rather than fossil fuels and coal.

DPW's study plans to compare the greenhouse gas emissions implications of incineration and landfill, as requested by my letter. However, the proposed methodology fails to take into account my concerns about the Maryland renewable energy portfolio, and instead erroneously assumes that the energy generated at the facilities under consideration displaces fossil fuels. Because this element of the methodology rests on a false assumption, it seems likely that it will result in inaccurate greenhouse gas findings. To address this concern, I ask that you conduct your analysis both with and without counting these fossil fuel offsets, so that the reader can understand how differences in these critical assumptions could influence the analysis.

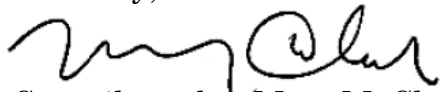
Relatedly, though I did not raise this issue in my initial letter, I urge you to reconsider the methodology's assumption that the carbon emissions from food scraps and yard waste are zero, due to a short-term carbon cycle (essentially, because plants regrow). For over a decade, scientists debunking carbon neutrality assumptions have pointed out that climate models already account for growing plant matter; therefore, zeroing out carbon emissions for food scraps and yard waste would result in double-counting what is already expected and included in climate models. It also overlooks the fact that some of the carbon in landfills is sequestered, while no carbon is sequestered when incinerating. Because this issue is in dispute, I ask that you, at a minimum, present your findings both with and without this carbon neutrality assumption, so that both perspectives are included in the results.

In addition to the greenhouse gas analysis, I am pleased that the proposed study will assess all health and environmental impacts of both waste disposal options, as requested. I am concerned, however, that the proposed methodology does not include any way to compare these impacts to each other. For example, it is possible that we could end up with a final study that finds that one option is better from a global warming perspective but worse on health impacts, without any basis for balancing these considerations. I recommend that the study present the results so that the global warming and other health and environmental impacts can be evaluated side-by-side using the same units, such as a monetized social/environmental harm indicator. This will make it possible for decisionmakers to understand the relative harm of all impacts considered.

Finally, while I am pleased that you are assessing the financial implications of incineration versus landfilling, it appears that you are not doing so through a request for information (RFI) as originally promised to the Committee in 2018. I am concerned that without an RFI that lays out the specific contractual arrangement sought by the District, the Agency will not get accurate cost information from potential bidders. I therefore urge you to seek cost information for this study through a formal RFI process.

Thank you for taking these concerns into consideration so that we can ensure that this study provides meaningful information to guide the future of the District's waste disposal.

Sincerely,



Councilmember Mary M. Cheh

cc: Lucinda Babers, Deputy Mayor for Operations and Infrastructure