



CITY OF ALGONA
402 Warde Street
Algona, Washington 98001

Administration (253) 833-2897
Public Works (253) 833-2741
Police (253) 833-2743
Fax (253) 939-3366

October 30, 2013

Pat McLaughlin
King County Solid Waste
201 S Jackson St., Rm. 701
Seattle, WA 98104

RE: King County Transfer Plan Review Report

Dear Mr. McLaughlin:

This letter contains our comments regarding the Transfer Plan Review Report being developed by the King County Solid Waste Division as part of its ongoing process to site future transfer stations. We are currently monitoring the environmental review of proposed sites by the County. We are also updating our comprehensive plan as required by the Growth Management Act. Our understanding of the schedule is that the Transfer Plan Review Report is to be delivered to the King County Council in November and the environmental review for station sites is to be completed in 2014. The comprehensive plan update must be completed by June 2015.

1. Timing

It is not clear how the three items I mention above relate to one another, given their apparent sequencing. The County seems to be wanting to identify the factors that should be considered in locating and sizing future transfer facilities. That would make sense, *if* the report makes it clear that its identifying capacity, design or other such factors does not presuppose or predetermine where actual transfer station sites will be located. That decision must await the Draft and Final EIS work; and from Algona's standpoint, will be heavily influenced by the Comprehensive Plan update which is just beginning.

Prior to the Transfer Station Review being ordered up by the County Council, the City had submitted scoping comments¹ to the County regarding the EIS being drafted as part of its site selection process. Three sites are under consideration for a new facility, one of which is located adjacent to the existing Algona facility. The City's scoping submittal outlined eighteen issues needing analysis in the EIS. In addition, there was discussion at the three workshops and in the report on emergency storage capacity and how that will be accommodated with any updated facilities. The answer to this question will have obvious impacts on site sizing, which in turn affects any siting in Algona or elsewhere.

I note in particular that one criteria in the Plan Review is "compatibility with adjacent uses", yet this appears only to be factored into the decision not to attempt a facility location at Eastgate. In our scoping letter, we raised several issues with regard to compatibility, yet I see no mention of it in the report.

Any conclusion contained in the Transfer Plan Review report that would steer a decision on future siting toward Algona, must be fully vetted as part of the current Draft EIS before any final report adoption. It is not acceptable to the City to have a future EIS view an Algona location as a *fait accompli* because of any findings contained in the current Transfer Plan Review.

2. Comprehensive Plan

Like other Puget Sound communities, Algona must update its GMA comprehensive plan by June 2015. There are specific standards for what must be contained in the Plan and these must be based on measures mandated by law. For instance, the City must be able to accommodate future populations through its housing policies, commercial uses must be balanced against "buildable lands" criteria, environmental standards must be maintained, "reasonable measures" and "best practices" must be employed. A capital facilities plan must be adopted to serve future growth needs. The City's commercial and industrial policies, including its Land Use map, will be drawn to ensure that there is a sufficient revenue base to support these capital needs, not the least of which is West Valley Highway which is heavily impacted by present and proposed future transfer station activity.

As explained in our scoping comment letter of November 2012, the effect of any expanded public use of the Algona site for future transfer stations, must be thoroughly vetted in the upcoming Draft EIS. I see no reference to this in the Transfer Station report as a factor in the siting decision. We request clarification of this item and further request discussion of it in the

¹ Letter, Mayor Pro Tem Bill Thomas to Eric Richardt, November 26, 2012.

report. Given Algona's smaller size and large issues as a Puget Sound community, there needs to be recognition of the disproportionate impacts to the City.

King County has a need to plan for its long term provision of solid waste and recycling services. The Transfer Plan Review appears to achieve the limited purpose of identifying key factors that will determine the sizing, functions and service areas. It is however, but one step in a complex process of determining the exact location for a facility in South County. A final decision is of the utmost importance to Algona and will occur only after a full environmental review, completion of the City's comprehensive plan and ultimately a permitting decision by the City. This process should be clearly stated in the Plan Review so that there is no misunderstanding of the process ahead.

Your statement on Page 2 of the draft report states, "While ensuring that any potential negative impacts of providing solid waste service do not **fall disproportionately on a single community.**" I believe that continued consideration of Algona contradicts this statement. The impact on a city with a population of 3,070 is disproportionate to the impact on a city with a larger population. How KCSW intends to mitigate disproportionate impacts should be included in the report.

3. Service and Capacity

You fail to address criteria 13 through 17 regarding impacts to local roadways and land uses. The land use on the proposed site in Algona is retail business primarily targeting car lots and other high retail tax businesses. Algona relies on this future income to fund basic services to our residents. We consider the report incomplete if it does not address these criteria.

4. Table 3

Number 17 Transfer station is compatible with surrounding land use is no for the proposed Algona location. Algona requests that the report include this chart specifically for each Transfer station since not all stations are equal.

5. Identification of specific sites

Under Alternative A bullet 5 you limit the south county recycling and transfer station to one of 3 sites currently being evaluated. Algona was originally told that one of the results of the Environmental Impact Statements could be none of the above. KCSW in this document limits the site selection process and prejudices Algona's potential selection as a final site. Alternative A* contains the same reference to the three sites being evaluated. Alternative B contains the same language. Alternative C** keeps Algona open for self haulers seven days a

week with no mention of needed road improvements. Alternative D** we object for the same reasons as C**.

6. Alternatives we support

We support Alternative C because it would close Algona Transfer Station in 2018. We also support Alternative D for the same reason.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Hill". The signature is written in a cursive style with a large initial "D".

David E. Hill, Mayor
City of Algona

October 23, 2013

Pat McLaughlin, Division Director
King County Solid Waste Division
201 S. Jackson Street, Suite 701
Seattle, Washington 98104

**RE: Draft Transfer System Plan Review Report
King County Solid Waste System**

Dear Pat McLaughlin:

Please let this letter serve as the City of Auburn's comments for the public comment period on the above referenced draft report. It should be noted that these will not be the City's only comments and that additional comments will be made during the King County Council legislative process.

The City of Auburn has been consistently concerned about the need for additional transfer stations in the solid waste system. We continue to be opposed to building a transfer station in the City of Auburn.

Sincerely,



Pete Lewis,
Mayor

cc: Shelley Coleman, Finance Director

February 3, 2014

King County Solid Waste
Attn: Diane Yates
201 S. Jackson St., Suite 701
Seattle, WA 98104

RE: City of Auburn Comments on the 2013 Draft Transfer System Plan Review Report

Dear Diane,

Thank you for the opportunity to provide comments on the 2013 review of the 2006 King County Solid Waste Transfer and Waste Management Plan. The City of Auburn appreciates the County's willingness to re-evaluate the assumptions and conclusions of the 2006 report which provides the basis for the County to develop a new solid waste handling facility in South King County.

The City of Auburn would first like to reiterate the positions outlined in Resolutions 4934 and 4953 adopted by the Auburn City Council on April 1, 2013 and May 20, 2013 (copies of which are appended hereto for convenient reference). Both sites proposed in Auburn present significant potential harm to the City of Auburn, its residents and businesses, the community's quality of life, the natural environment, utilities, roads, traffic, the local economy, property values, and flood detention. Neither site is an appropriate location.

It is obvious that the County approached this effort with a foregone conclusion that a new solid waste handling facility is required, since the choices are limited to build or not to build, that the only solution is a one size fits all approach to transfer stations, and that it fails to incorporate any innovative approaches. A more genuine approach would have been to allow an outside audit of the report. Instead, the report amounts to a statement of further substantiating the 2006 Plan as evidenced by the statements contained in the second and third paragraphs of the Introduction and the emails provided by garbage haulers which project a position that a new South County transfer station is the only way to avoid increased costs to the rate payers. Unfortunately, the 2013 report fails to provide adequate analysis to support this position and falls short of addressing a variety of concerns previously stated by the City of Auburn and many of its residents. Examples of the inadequacies of the report include:

- Of the various alternatives described there is no reference to an option of retaining, renovating, or expanding the Algona facility to serve as something more than a self-haul facility. Based on the amount of adjacent expansion land currently owned by King County Solid Waste and the obvious opportunities presented by adjacent land uses, serious consideration must be given to the viability of redeveloping the existing site. The existing Algona site is ideal for minimizing impacts to adjacent and nearby land uses as a result of topography, the location of roads, and the modest amount of nearby development.

- The report does not address the need for 24 of the other 37 cities in King County to embrace mandatory garbage and recycling services. If all cities were to take the same actions as Auburn and make these services mandatory it would have a dramatic impact on the assumptions and conclusions that are leading King County to the belief that Auburn is the appropriate location for a new solid waste handling facility. The City urges the County to take a proactive leadership role in encouraging and/or requiring all municipalities to do the right thing and implement regulations that make garbage and recycling services mandatory. The City urges King County to perform an evaluation of preferred siting locations using a scenario that assumes garbage and recycling services are mandatory in all cities so that rate payers can better understand the efficiencies and cost savings that will result. Until this happens, this City is left with no other conclusion that it has been penalized for making the right decision to make garbage and recycling service mandatory.
- The report fails to revisit the 17 criteria used for siting a solid waste handling facility. Of particular importance, the criteria fails to address compliance with local land use policies and ordinances. While the criteria does address compatibility with surrounding uses it does not acknowledge compatibility with the laws that govern the use of the property upon which the facility is proposed to be sited. The City recognizes that the State's Growth Management Act designates a solid waste handling facility as an "essential public facility". The City further recognizes that this designation prohibits the City from establishing regulations that prohibit the siting of an essential public facility. However, we urge the County to incorporate adopted local policies and regulations into its siting criteria and decision making process.
- The guiding principles of the report fail to include the need to incorporate social and environmental justice when deciding which community to locate a facility. The City of Auburn already struggles with poverty levels that are higher than statewide averages and overall household income which is lower than the statewide average. Siting a solid waste handling facility in Auburn is contrary to significant investment and effort that Auburn continues to make in reversing these statistics.
- The County is representing the haulers comments as final conclusions instead of treating them as conditional statements based on very little detail and information (in fact, it is interesting that the letter or correspondence delivered to each provider which asks for their feedback was not included in the appendix and therefore not reviewable). Waste Management's comments include statements such as "we must stress that these are only rough projections based on the limited information available currently", "a more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County...transfer stations", "consideration of these variables may significantly affect the cost estimates listed below", "we are concerned about potential unintended consequences associated with a rushed process", "thus, we recommend a cautious approach coupled with careful analysis", and "the scenarios elicited much discussion even though we have limited information to act upon at this time". All of these qualifiers hardly create confidence in the conclusions King County has inserted in the report. Additionally, Republic provides no background data to support their statements. The report should provide

far more detail that documents the data and assumptions used in calculating haul costs given that it has such a significant impact on the Plan's conclusions.

- If the County is unwilling to reconsider building a new \$70,000,000+ solid waste handling facility additional consideration should be given to other properties within the region that are more appropriate. There are a number of other properties located along Highway 167 and Highway 18 that are located within both incorporated and unincorporated areas that could serve as ideal locations for a solid waste handling facility. Given that GMA allows for an essential public facility to be sited outside of an urban growth area the County should further consider locating a facility within the unincorporated areas of the region.

The City urges King County to conduct further evaluation of the Solid Waste Management Plan before spending tens to hundreds of millions of dollars in tax payer dollars that plugs a state of the art facility into an outdated solid waste handling system and strategy. For that matter, King County ought to incorporate into its siting considerations the fact that Auburn requires garbage and recycling services. That is different than so many other cities in King County. The absence of these requirements contributes significantly to the need for your transfer station facility.

The City looks forward to working with the King County Solid Waste Division in its efforts to improve the service that it provides to residents. However, the City of Auburn reserves the right to pursue all appropriate and necessary legal remedies to protect the citizens of Auburn from the negative economic, natural, physical and socio-cultural impacts that a solid waste facility would create.

Sincerely,



Nancy Backus
Mayor
253-931-3041

Sincerely,



Jeff Tate
Assistant Director of Community Development
253-804-5036



Daniel B. Heid
City Attorney
253-931-3054



Shelley Coleman
Director of Finance
253-804-5019

cc: Kevin Snyder, Director of Public Works and Community Development

City of
Bellevue



Office of the Mayor • Phone (425) 452-7810 • Fax (425) 452-7919
Post Office Box 90012 • Bellevue, Washington • 98009-9012

SENT VIA ELECTRONIC MAIL

October 25, 2013

Pat McLaughlin, Director
King County Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104

Re: Bellevue City Council Comments on Draft Solid Waste Transfer Station Plan Review

Dear Mr. McLaughlin:

I am writing in response to your request for comments on the draft Solid Waste Transfer Station Plan review. The Bellevue City Council reviewed the draft Plan and supports the following:

- A regional solid waste system that provides facilities that are efficiently and equitably distributed throughout King County so that no areas are underserved and no one city bears a disproportionate share of responsibility for the region's solid waste;
- Building a new transfer station in northeast King County to address projected growth in the northeast and more equitably distribute impacts, including road, traffic, land use compatibility and collection costs;
- Honoring the agreement between the City and the County not to build any portion of the Factoria Transfer Station on the upper Eastgate Way property abutting Eastgate Way (see attached map); and
- Sale of the Eastgate Way property in the future, with the proceeds used to offset the cost to develop other system capital investments and provide rate relief to all customers.

"Supersizing" the new Factoria Transfer Station or building an additional transfer station on the upper Eastgate Way property would be incompatible with land use in the area and detrimental to the City of Bellevue for the following reasons:

- The Bellevue City Council recently adopted the Eastgate I-90 Corridor Plan (see attached "Eastgate/I-90 Land Use and Transportation Project" summary) that solidifies the City's vision for commercial development of the area and envisions Eastgate Way as a mixed-use, transit-oriented development around the Eastgate Park and Ride and Bellevue College;

City of Bellevue offices are located at 450 - 110th Avenue N.E.

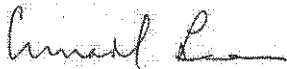
- The I-90 Corridor Plan specifically designates the upper Eastgate Way property for office development (see attached "King County Site" excerpt from I-90 Corridor Plan); and
- Traffic continues to increase and is a significant concern for mobility in this area, which is a gateway to Bellevue.

It should also be noted that the Eastgate I-90 Corridor Plan specifically provides appropriate zoning to ensure that the County can rebuild Factoria on its current site and on the adjacent lower properties the County purchased for that purpose. In fact, King County Solid Waste Division staff has worked extensively and cooperatively with Bellevue staff to secure the permits needed to rebuild on those lower sites.

Specifically, the Council strongly urges that the ambiguous language in the draft Plan recommendation regarding the future expansion of Factoria be removed and replaced with a definitive statement that the County will **not** seek to expand the Factoria Transfer Station on the upper Eastgate Way property now or in the future.

We look forward to continuing to work cooperatively with you on rebuilding the Factoria Transfer Station on the existing site. Thank you for considering the Council's comments on the draft Plan recommendation.

Sincerely,



Conrad Lee
Mayor

cc: Bellevue City Council
The Honorable Dow Constantine, King County Executive
King County Council
Diane Carlson, Director of Regional Initiatives, King County Executive's Office
Kevin Kiernan, Assistant King County Solid Waste Division Director

Attachments:

Map of Factoria Transfer Station
Eastgate/I-90 Land Use and Transportation Project Summary
"King County Site" excerpt from I-90 Corridor Plan

Eastgate/I-90 Land Use & Transportation Project

CITY OF BELLEVUE

What is this project?

In October 2010 the Bellevue City Council authorized the Eastgate/I-90 Land Use & Transportation Project to identify a long-term (to year 2030) vision for the area. A Citizen Advisory Council (CAC) identified, developed, and evaluated land use and multi-modal transportation concepts.

The planning process extended from November 2010 to April 2012. It included regular monthly meetings, public open houses, an economic development forum, online surveys, stakeholder interviews, and presentations to interest groups.

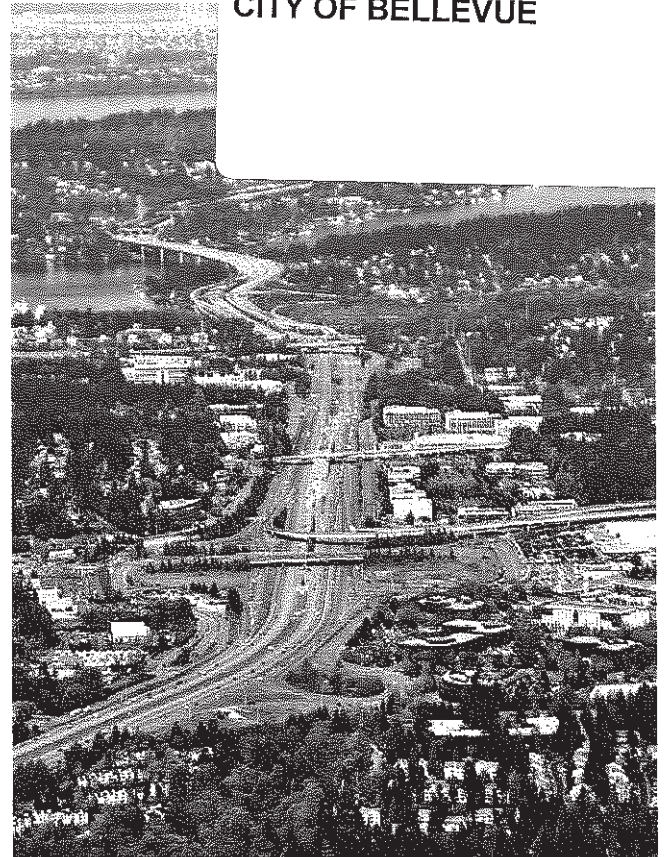
The CAC's work culminated in a "preferred alternative" that enhances the economic vitality of the I-90 corridor, provides for neighborhood retail services, improves transportation infrastructure, traffic flow, and travel options, upgrades the area's environmental quality and visual character, and supports the institutional mission of Bellevue College.

What's the vision?

LAND USE

The best opportunity to expand Eastgate's economic role as an employment center, as well as adding retail services and some residences, is mixed-use transit oriented development (TOD) around the Eastgate Park & Ride and south of the Bellevue College (BC) campus. This area has the potential to accommodate a substantial portion of the market demand for additional office space, is suitable for mid-rise residential development, leverages transit investment, and minimizes adverse impacts to transportation systems. As such, the greatest building heights and intensity are proposed at this location. This development concept also provides a spectrum of opportunities for BC and creates a high visibility focus for Eastgate with a mix of uses, multi-modal access, and ample amenities.

Elsewhere in the corridor, redevelopment would be encouraged by allowing larger office buildings, though less than at the TOD center. Increased development potential would be offered in exchange for public benefits. Current restrictions on support retail and service uses in office districts would be eased to bring these conveniences closer to places of employment,



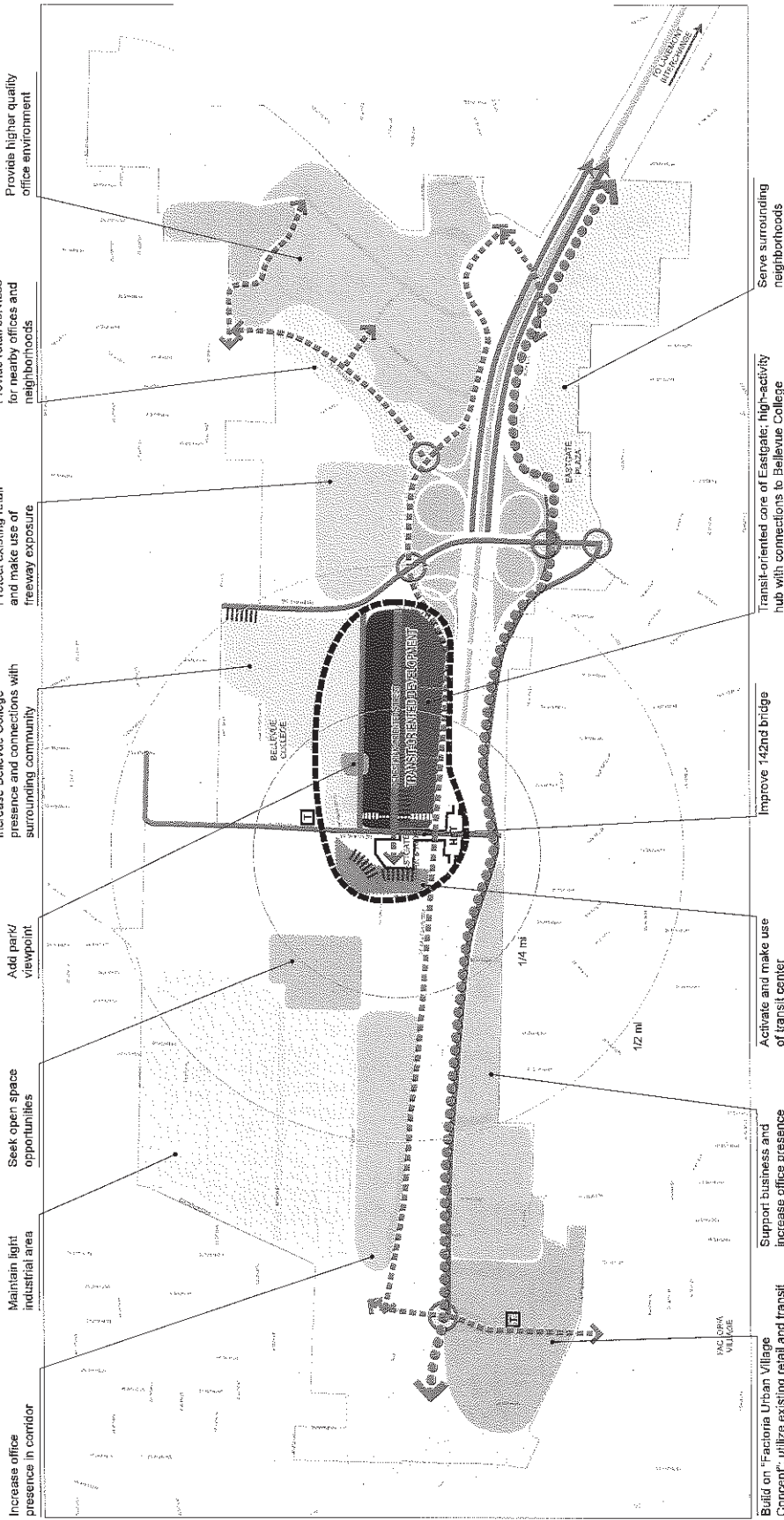
How much growth can Bellevue expect here?

The preferred alternative is projected to accommodate the following new growth by the year 2030:

- Office – 1,800,000 square feet
- Institutional (Bellevue College) – 350,000 square feet
- Retail – 100,000 square feet
- Industrial – 0 square feet
- Hotel – 300 rooms
- Residential – 800 dwelling units

To make this growth possible, land use regulations and policies must change, especially to encourage redevelopment that contributes to the corridor's economic vitality and desired public amenities. Without these changes, little growth is expected within the next twenty years due to the developed nature of the corridor and the value of existing improvements.

Preferred Alternative



- Residential commercial 1
- Residential commercial 2
- Office mixed use
- Office
- Commercial residential
- Commercial
- Light industrial
- Institutional
- Park
- ||||| Retail frontage
- ee Mountains to Sound Greenway Trail
- ➡ Non-motorized improvement
- Multi-modal improvement
- Intersection improvement
- ICG Potential future High Capacity Transit hub
- Transit hub
- Gateway
- ⊕ Transit-oriented development

0 200 400 600 Feet

Eastgate 1-90
1st and 2nd Transportation Project

Increase office presence in corridor

Maintain light industrial area

Seek open space opportunities

Add park/viewpoint

Increase Bellevue College presence and connections with surrounding community

Protect existing retail and make use of freeway exposure

Provide retail services for nearby offices and neighborhoods

Provides higher quality office environment

Build on "Factoria Urban Village Concept", utilize existing retail and transit

Support business and increase office presence

Activate and make use of transit center

Improve 142nd bridge

Transit-oriented zone of Eastgate: high-activity hub with connections to Bellevue College

Serve surrounding neighborhoods

reducing daytime vehicle trips. Existing retail centers (e.g., Sunset Village, Eastgate Plaza, Factoria Village, and 156th Ave SE) would be retained and enhanced, to continue to serve the employment base and surrounding neighborhoods. Modest residential development would occur, taking advantage of proximity to employment, transportation, and shopping.

TRANSPORTATION

The land use vision is supported by transportation strategies that serve regional and local travel with an expanded and more efficient interstate system, network of local streets, bus routes,

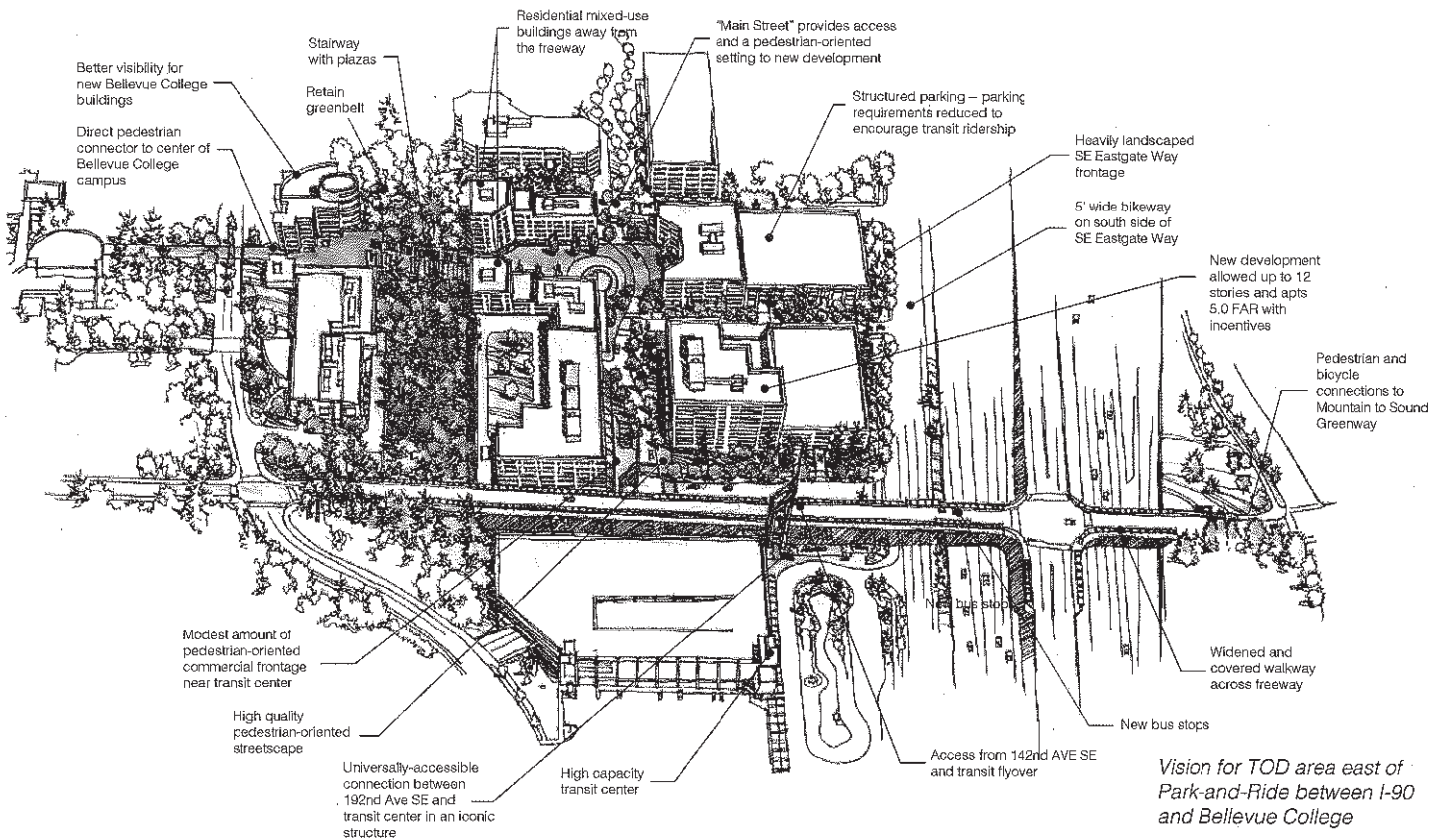
north side of I-90, the future TOD center, and Bellevue College, creating a strong north-south linkage.

Other transportation improvements recommended in the preferred alternative address the following:

- Improvements to existing and future choke points at critical intersections and their approaches (could include roundabouts or other traffic control devices);
- Access to and support for new development;
- Safer and more complete pedestrian and bicycle networks;

- Completion of the Mountains-to-Sound Greenway Trail through Eastgate;
- Upgraded transit operations and access to transit stops;
- Improved visual coherence and attractiveness of the corridor (e.g., 150th Avenue SE boulevard project); and
- Support of WSDOT in their efforts to increase vehicle capacity on I-90.

Taken together, these measures will ensure that the land use growth envisioned by the preferred alternative will be supported by appropriate infrastructure improvements.



Vision for TOD area east of Park-and-Ride between I-90 and Bellevue College

What could it look and feel like?

Building on Bellevue's "City in a Park" theme, landscaping is emphasized to enhance corridors and frame views, such as naturalistic landscaping in the freeway and interchange ROW and substantial street landscaping on several streets. The new TOD area will likely be a more intense, urban character with a pedestrian-friendly main street and landmark structures visible from I-90 (see image above). Finally, the Mountains to Sound Greenway trail will add a "green" connector through the area.

How can it happen?

The "vision" is just the starting point for realizing the evolution of the corridor. General implementation strategies include:

- Amend the City's Comprehensive Plan, Land Use Code, Zoning Map, and Transportation Facilities Plan.
- Complete the environmental review.
- Balance increased development potential with public benefit requirements (e.g., open space, outdoor seating, affordable housing, bicycle facilities, etc.).
- Study allowable building heights and floor area ratios in more detail to ensure the quality of future development.
- Direct a substantial portion of the projected office and residential growth to the Transit-Oriented Development center through Land Use Code amendments.
- Partner or continue partnering with other agencies, service providers, and private development (e.g., WSDOT, Metro, Sound Transit, and Bellevue College).



Recommended improvements to SE 36th St include Mountains-to-Sound Greenway Trail on north side, landscaping to buffer walkers and bicyclists and encourage a human scale, prominent crosswalks, and striped bike route.

- Invest in projects outlined in the Transportation Strategies Report.
- Create design guidelines and "green" guidelines to ensure high quality and sustainable private development.
- Landscape the interchanges with gateway treatments.

These actions will help ensure that the Eastgate corridor will continue to be a major contributor to Bellevue's economic vitality, provide local services and connections, serve as a prominent and visually pleasing gateway, and remain an attractive place in which to do business and serve the surrounding community.

For more information and full report, visit:
www.ci.bellevue.wa.us/eastgate-corridor.htm



Eastgate/I-90 Land Use & Transportation Project

King County Site

DESCRIPTION AND PURPOSE

Lying on the north side of I-90 midway between Richards Road and the Park and Ride/Transit Center, the former King County Metro park and ride site is seen as an opportunity for new office development that will significantly increase Eastgate's economic activity. The currently vacant site is depressed below both the I-90 and SE Eastgate Way road profiles, but its convenient access makes it desirable as an office location. Greater height and FAR allowances are proposed to give the site the visibility new office space will require and encourage greater "infill" development just west of the transit center. The objectives for this area call for substantial street landscaping and on-site open space to compensate for the additional allowed development capacity.

USES AND INTENSITY

Use: Office uses are encouraged. Support retail and service uses are allowed but not required.

Maximum FAR: Allowable Floor Area Ratio should be sufficient to ensure that this site will perform economically. An FAR of roughly 1.0 to 1.5 is recommended. FAR above 0.5 should be achieved through an incentive system or similar mechanism.

Maximum building height: Allowable building heights should provide visibility from I-90. Heights are generally assumed to be in the 8 to 12 story range.

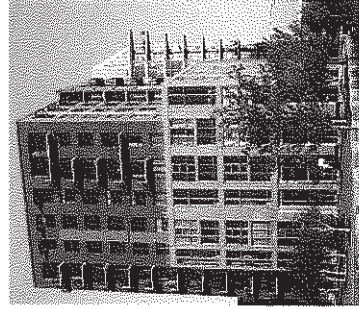
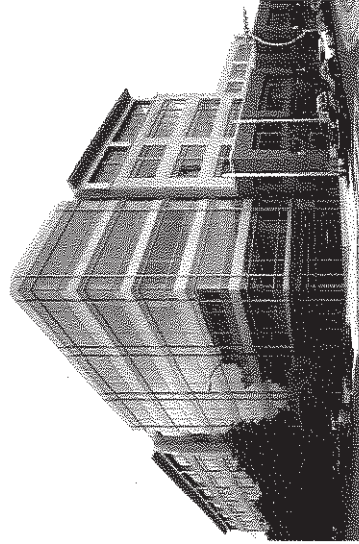
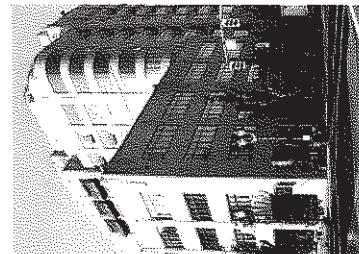
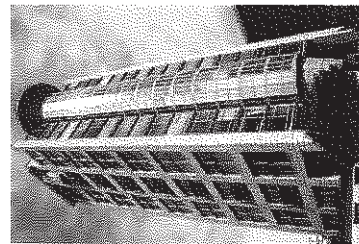
CHARACTER

It is anticipated that one or two towers will be constructed with structured parking.

providing substantial opportunity for naturalistic landscaping. Design guidelines and site design standards should be established to ensure that the buildings exhibit high quality design and construction. The envisioned image is one or two sculptural towers emerging from a heavily vegetated backdrop.

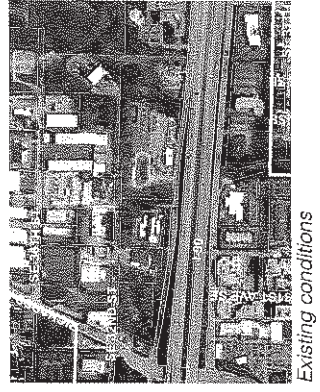
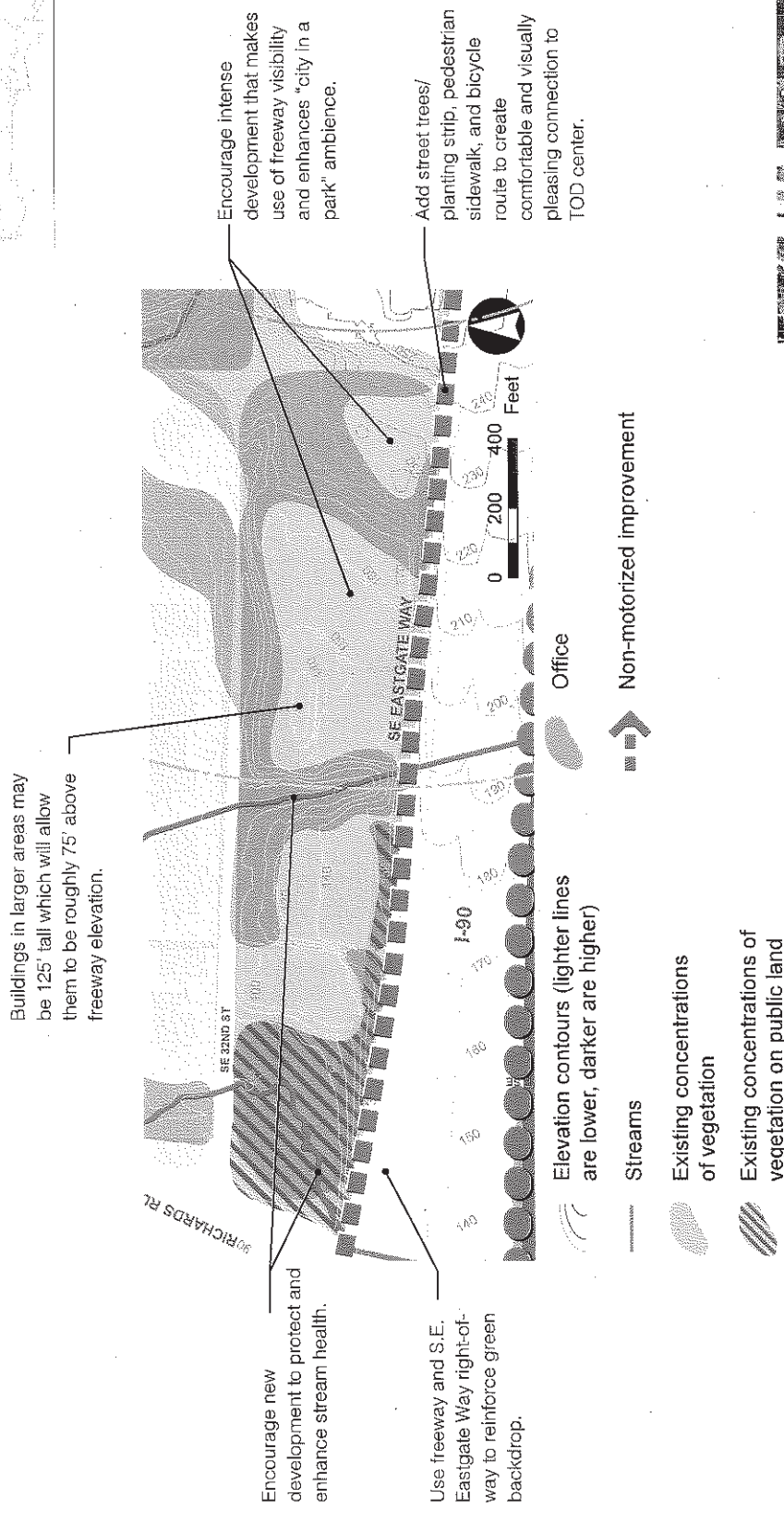
ATTRIBUTES AND STRATEGIES

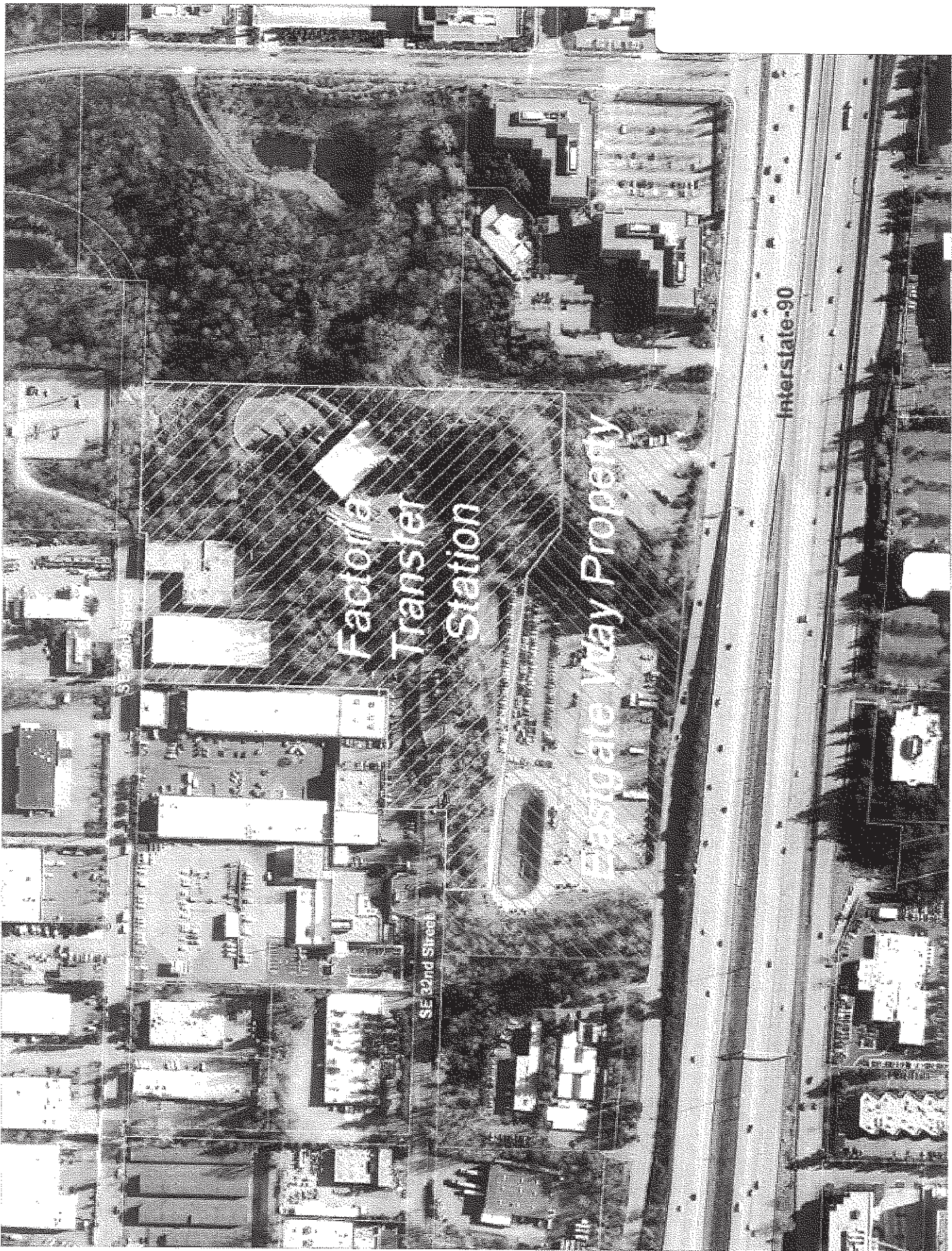
- Allow greater development capacity to encourage higher intensity office and supporting uses.
- Enhance access and connectivity in the corridor with bicycle lanes and sidewalks on SE Eastgate Way.
- Establish building and site design standards to ensure that this project adds to the area's visual quality.



CHARACTER EXAMPLES

KING COUNTY SITE





Factoria Transfer Station - 13800 SE 32nd Street, Bellevue, WA

City of
Bellevue



Office of the Mayor • (425) 452-7810 • Fax (425) 452-7919
Post Office Box 90012 • Bellevue, Washington • 98009-9012

January 27, 2014

Pat McLaughlin, Director
King County Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104

RE: Bellevue City Council Comments on Draft Solid Waste Transfer Station Plan Review
New Alternatives

Dear Mr. McLaughlin:

I am writing in response to your request for comments on the draft Solid Waste Transfer Station Plan review. This letter is in addition to the Bellevue City Council comment letter sent on October 25, 2013. The Bellevue City Council received a briefing from King County staff on January 27 and submits the following additional comments on the Transfer Station Plan review:

- Bellevue supports a regional solid waste system that provides facilities that are efficiently and equitably distributed throughout King County so no areas are underserved and no one city bears a disproportionate share of responsibility for the region's solid waste.
- King County's final recommendation for the number and distribution of transfer stations must address projected growth in the northeast and must equitably distribute traffic and road impacts.
- The final recommendation should honor the agreement between the City and the County not to build any portion of the Factoria Transfer Station on the upper Eastgate Way property abutting Eastgate Way; building on that site is not a compatible land use and would conflict with the City's vision for mixed use transit oriented development around the Eastgate Park and Ride and Bellevue College.
- Bellevue supports the current permitted design for the rebuilding of Factoria Transfer Station and urges no more delays in beginning construction. Significant changes to the design, such as enlarging the station, would require new permits and create unacceptable impacts to roads and traffic in the area.
- Bellevue supports maximizing investments that have already been made in the system, such as fully utilizing the available capacity at the Shoreline Transfer Station by redirecting commercial hauling traffic, and finding ways to use already existing transfer stations, through operational/service modifications if necessary.
- The final recommendation in the transfer plan review must include flexibility so the system can be adjusted as the region experiences the results of any modified County policies and operational or service adjustments. For example, no existing transfer stations should be closed until it can be demonstrated that the steps taken to equitably distribute the region's solid waste and mitigate impacts to host cities have been successful.

City of Bellevue offices are located at 450 - 110th Avenue N.E.

- The solid waste system comprehensive plan must include specific thresholds that will trigger future consideration of a new northeast transfer station. These include population growth, increased tonnage, traffic, road, or other impacts to cities that host transfer stations.

In conclusion, we look forward to continuing to work cooperatively with you on rebuilding the Factoria Transfer Station on the existing site and developing a future system plan that works for the entire region. Thank you for considering the Council's additional comments on the draft Plan recommendation.

Sincerely,



Claudia Balducci

Mayor

cc: Bellevue City Council
King County Executive Dow Constantine
King County Council
Kevin Kiernan, Assistant King County Solid Waste Division Director
Diane Yates, Intergovernmental and Legislative Liaison for King County Solid Waste
Division

CITY OF BOTHELL

From: SWD, WebSite
Sent: Friday, November 01, 2013 2:30 PM
To: Sabrina Combs
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Sabrina Combs
ADDRESS: Bothell, WA 98011
EMAIL: sabrina.combs@ci.bothell.wa.us
COMMENTTYPE: Suggestion
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: The City of Bothell wants to thank King County Solid Waste Division for providing the Draft Solid Waste Transfer and Export Plan. We appreciate the time and analysis that King County Solid Waste Division staff put into the informational meetings and the draft document.

After reviewing the draft plan, the City of Bothell recommends the Base Alternative because of the forecast for population growth through 2040, lower collection costs and balance of services across King County. Other alternatives without a Northeast Transfer Station are not supported because they would lead to further drive times, labor and equipment costs for our hauler and in turn increased costs from the hauler to our residents.

However, we would like to request a change in timing for the planning and siting of the Northeast Transfer Station. In review of the plan documents and concerns expressed by both City of Kirkland and Bellevue at the MSWMAC meeting on October 18, 2013; it would seem advantageous for the County to plan these two stations at the same time.

The City of Bothell would also like to request that the evaluation of the Northeast Transfer Station include a review of existing services in the area (i.e. metal recycling, processing facility for curbside recyclables, organics processing facilities, etc.) to determine what services are needed for a transfer station in the Northeast and the size required for this new station.

Finally, we would like to request that King County finalize the details for the rate differentials for cities that have not signed the Restated and Amended Interlocal agreement with King County and provide firm deadlines for signatures to be included or to opt out. An understanding of the cities that have signed agreements would conclude that process and enable planning.

IMG_VERIFY: GYD

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 11/1/2013 2:29:53 PM

CITY OF BURIEN

From: Craig Knutson <craigk@burienwa.gov>
Sent: Monday, October 21, 2013 11:33 AM
To: Yates, Diane
Cc: Joan McGilton; Council Members
Subject: Transfer System Plan Comments to King County

Hello Diane,

Please accept the following comments from the City of Burien regarding the Draft Transfer System Plan Review (October 9, 2013) issued by King County. These comments are submitted on behalf of Mayor Brian Bennett and the Burien City Council.

The City of Burien strongly endorses the draft report's recommendation of the Base Alternative, which we understand is King County's current plan. We understand that the Base Alternative was originally developed in 2006 and describes new or refurbished capital facilities to the existing transfer station configuration. The Base Alternative is a complete capital build-out of the long term transfer of solid waste for disposal and provides the greatest number of transfer facilities, evenly distributed throughout the system so that all users receive a uniform level of service. The Base Alternative also minimizes environmental impacts by reducing transfer truck trips to the disposal site, carbon emissions, and damage to road surfaces. The City of Burien believes the Base Alternative supports the regional needs for targeted self-haul, recycling, compaction objectives, and emergency storage, while providing the highest level of service in comparison to all other options (Alternatives A, A*, B, C, C**, D, D** and D***).

The City of Burien strongly opposes Options C through D***. These options would adversely affect Burien's waste collection, transfer and disposal, because they do not include the proposed South King County transfer facility. Although, on the surface, this might appear to be a cost effective solution, all South King County waste would be handled at the Bow Lake facility. This would slow down commercial collection at Bow Lake and cause a significant impact on self-haul access for our community. We are also concerned that this would eventually cause an increase in collection costs to our ratepayers.

The City of Burien appreciates the opportunity to submit these comments to King County Solid Waste Division and appreciates the staff time it took to prepare all the comprehensive and detailed materials for the City's consideration.

Thank you for your consideration of these comments.

Craig Knutson, Interim City Manager
Joan McGilton, City Councilmember



CITY HALL
33325 8th Avenue South
Federal Way, WA 98003-6325
(253) 835-7000
www.cityoffederalway.com

October 16, 2013

King County Executive Dow Constantine
King County Chinook Building
401 5th Avenue, Suite 800
Seattle, WA 98104

RE: City of Federal Way Comments on the October 9, 2013 Draft Transfer Plan Review

Dear Executive Constantine,

The City of Federal Way appreciates the efforts King County staff made in facilitating this review in such a timely manner. However, the short time frame for review and comments poses challenges and makes it difficult for cities to provide input and we recommend extending the comment period.

The City fully supports the Base Alternative which constructs a South County transfer station as recommended in the last paragraph on Page 35 of the Draft Review. The City agrees with the study's findings that clearly support adequate solid waste transfer capacity for the growing population of South King County. The City also values how this recommendation helps to ensure service equity throughout the regional system, while allowing lower costs for collection services over time.

The report shows that lower operating costs, i.e. fuel, equipment and labor, will more than offset the projected capital cost of building the Base Alternative. Based on the Review's findings, the City supports continuing the transfer station siting process now underway for South King County.

Thank you for considering Federal Way's input regarding this important matter. Please contact me at 253.835.2402 or Cary Roe, P.E., Director of Parks, Public Works, and Emergency Management at 253.835.2710 if you wish to discuss this issue further.

Sincerely,

A handwritten signature in black ink, appearing to read "Skip Priest", written over a light gray background.

Skip Priest, Mayor

cc: Pete von Reichbauer, Councilmember, 516 Third Ave, Room 1200, Seattle WA 98104
Pat McLaughlin, Director, King County Solid Waste Division, King Street Center, 201 S Jackson Street, Suite 701, Seattle, WA 98104
Kevin Kiernan, Assistant Division Director, King County Solid Waste Division, King Street Center, 201 S Jackson Street, Suite 701, Seattle, WA 98104
City Council Members
Pat Richardson, City Attorney
Cary M. Roe, P. E., Director of Parks, Public Works, and Emergency Management
Day File



November 1, 2013

**CITIES OF
KENMORE, REDMOND
SHORELINE, WOODINVILLE**

Christie True, Director
King County Department of Natural Resources and Parks (DNRP)
201 S Jackson Street, Room 700
Seattle, WA 98104-3855

RE: Comments on 2006 Solid Waste Transfer and Waste Management Plan Review Draft Report

Dear Christie,

The King County transfer station system must be right sized to provide appropriate solid waste services at affordable rates. The County's Draft Transfer Plan Review Report recommends moving forward with the Adopted 2006 Solid Waste Transfer and Waste Management Plan, called the base plan in the draft report, with a deferral of the siting and construction of a new Northeast Transfer Station. The draft report is vague on when work would begin on siting and construction of the Northeast Transfer Station.

We would recommend adding a requirement that work will not begin on the Northeast Transfer Station until such time that the data supports the need for an additional transfer station to be built and that King County Council approval for an additional transfer station shall be obtained before the County proceeds with work on a new Northeast Transfer Station.

We would also recommend that the County explore additional options for the design of the Factoria transfer station, including (1) handling Household Hazardous Waste off-site at another location and re-programming this space as part of the transfer station, (2) increasing transactional capacity without using the Eastgate property, and (3) exploring adjacent properties other than the Eastgate property, if the data shows that additional capacity is needed. This transfer station must be designed to meet the needs of the system, even if that requires revisiting the design to remedy potential capacity constraints and changes to the schedule for construction of the facility.

If additional capacity is needed during an interim time period before 2028 after older transfer stations are closed, fully utilize the Factoria transfer station for commercial and self-haul garbage, even if recycling needs to be handled off-site or at other transfer stations for this limited time period. Optimizing the use of the Factoria transfer station will provide greater flexibility for the system and may eliminate the need for an additional transfer station in the future.

With the County's emphasis under Executive Constantine on providing cost effective and responsive services in other areas of county government, we would recommend the County conduct an operational review of each of the transfer stations, including the new stations. It is imperative that the County maximize the ability of these stations to accommodate not only the tonnage but the transactional needs of customers prior to building and operating additional facilities.

Given the significantly reduced tonnage and cost-conscious environment that exists today, consider providing some of the specialized recycling and other services at the newer stations that have already been built and can accommodate this demand. If there are time periods with capacity constraints, consider reducing the Regional Direct Fee to encourage haulers to bypass transfer stations and bring garbage directly to Cedar Hills.

Finally, we would recommend the County develop a rate forecast through 2040. During the discussions between the cities and County on extending the ILA, the Solid Waste division developed a rate forecast; this forecast projects a rate of \$155 per ton during the 2029-2032 time period, with capital improvements per the Adopted Plan financed by 20-year bonds.

The revised tonnage forecast of 860,000 tons through 2040 is slightly more than half of the 1.6 million ton forecast that was the basis of the \$155 per ton tipping fee. After 2028, there will be five less cities participating in the County's solid waste system and fewer customers. The capital and operational costs of the system spread over half the tonnage and fewer customers will result in a tipping fee that is considerably higher than the forecasted \$155 per ton. As participants in the solid waste system, rate stabilization is a paramount concern that must be given more serious consideration.

We have been provided with a rare opportunity to review a \$300+ million plan for our future solid waste transfer station system. We thought the review would be more objective and creative, involving a fresh analytical approach to ensure that customers would be provided the best value for their money. Instead, the review consisted primarily of defending the Adopted Plan, without supporting data and analysis, and without any proposals for new service standards, new policies or any meaningful change to the Plan.

The County must do better to take full advantage of this opportunity to right-size the transfer station system to provide appropriate solid waste services at affordable rates.

David Baker



Mayor

City of Kenmore

John Marchione



Mayor

City of Redmond

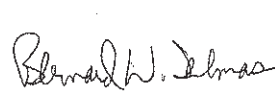
Keith McGlashan



Mayor

City of Shoreline

Bernard W. Talmas



Mayor

City of Woodinville

cc: King County Councilmembers
Pat McLaughlin, Director, Solid Waste Division, DNRP
Diane Carlson, Director of Regional Initiatives, King County Executive Office
Michael Huddleston, Municipal Relations Director, King County Council
Ben Thompson, Deputy Auditor, King County Auditor's Office
Bob Thomas, Senior Principal Management Auditor, King County Auditor's Office



February 3, 2014

Christie True, Director
King County Department of Natural Resources and Parks (KCDNRP)
201 S Jackson Street, Room 700
Seattle, WA 98104-3855

RE: Comments on 2006 Solid Waste Transfer and Waste Management Plan Review

Dear Christie,

We appreciate all of the work that your staff have done in their review and analysis of transfer station system options to ensure that the system is right sized to provide appropriate services at affordable rates. It is clear to us that staff have not only listened to our comments and concerns, but continued their analysis of options to address our concerns. We are pleased to learn that you will be recommending that the Factoria transfer station re-build proceed as planned, with minor modifications, and that you have identified options for further discussion with regional partners that do not require building a new northeast transfer station.

We support proceeding with the construction of Factoria on the existing site, with minor modifications that will allow this transfer station to be fully utilized for solid waste tonnage as well as transactional needs. The County has already spent over 20 million dollars designing this transfer station. The Solid Waste Division has concluded that this transfer station can work with minor modifications. We believe it is important to provide a definitive statement that the County will not super-size this project or expand to the Eastgate property, since the transfer station can be modified to meet tonnage and transactional capacity needs. We would like to add our voice of support for proceeding with this project.

The Solid Waste Division has also identified three options that would allow the system to handle future solid waste tonnage, per the revised tonnage forecast. The Division has concluded that Factoria can proceed without foreclosing these options. One of the options calls for redesigning and building Factoria to be a bigger station, in essence super-sizing Factoria. It is not necessary to pursue this option, as the Solid Waste Division has concluded that Factoria can meet tonnage and transactional needs with minor modifications on the current site. Therefore, we do not support retaining this option for continued consideration.

Christie True, Director
February 3, 2014
Page 3 of 3

Just as we have undertaken this review of the Plan to ensure that it provides for a right-sized system that provides appropriate services at affordable rates, the County and its' partners will undertake another review at an appropriate time in the future to again assess the solid waste infrastructure that is needed to serve the County and its partners.

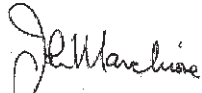
Sincerely,

David Baker



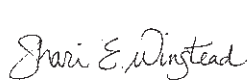
Mayor
City of Kenmore

John Marchione



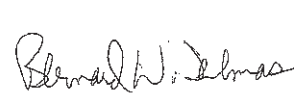
Mayor
City of Redmond

Shari E. Winstead



Mayor
City of Shoreline

Bernard W. Talmas



Mayor
City of Woodinville

cc: King County Councilmembers
Pat McLaughlin, Director, Solid Waste Division, DNRP
Diane Carlson, Director of Regional Initiatives, King County Executive Office
Michael Huddleston, Municipal Relations Director, King County Council
Ben Thompson, Deputy Auditor, King County Auditor's Office
Bob Thomas, Senior Principal Management Auditor, King County Auditor's Office



CITY COUNCIL
Dennis Higgins, President
220 4th Avenue South
Kent, WA 98032
Fax: 253-856-6712

PHONE: 253-856-5712

October 22, 2013

King County Solid Waste Division
Attn: Pat McLaughlin, Director
201 South Jackson Street, Suite 701
Seattle, WA 98104

RE: City of Kent Comments on the October 9, 2013 Draft Transfer Plan Review

Director McLaughlin:

After reviewing the various Alternatives offered in the Transfer Plan Review packet, it is our preference to go with the Base Plan. We strongly feel that the South County Transfer Station is necessary to provide environmentally sound disposal service efficiently, effectively and at reasonable rates into the future.

Without the new station to replace the Algona Station, Bow Lake would take on a significant number of unanticipated customers. This facility was not designed to handle the additional volume that would result if the South County Station were not built. This would increase traffic in Kent, affecting freeways and arterials that are already over capacity.

In addition, we find it crucial that recycling be offered at each transfer station to reduce waste and extend the life of our last remaining landfill in King County.

We appreciate everyone's efforts going through this rigorous review process and the opportunity to comment on the Plan, and are hopeful of a successful outcome.

Sincerely,

A handwritten signature in cursive script that reads "Dennis Higgins, R.H."

Dennis Higgins
Kent City Council
President

From: John MacGillivray <JMacGillivray@kirklandwa.gov>
Sent: Tuesday, October 15, 2013 3:27 PM
To: Yates, Diane
Cc: Pam Bissonnette; Kurt Triplett; Rob Jammerman
Subject: RE: Draft Transfer Plan Review Report - KIRKLAND COMMENTS
Attachments: Kirkland Transfer Station Resolution and Position Statement.pdf

Diane,

We would like to thank the King County Solid Waste Division for the opportunity to participate in the review of the Solid Waste Transfer and Export Plan and recognize the Division for conducting such a thorough analysis within a compressed timeline.

We agree with the Base Alternative recommendation. While this alternative has the highest capital cost, it clearly provides the most value to our ratepayers and elegantly balances equity amongst all members of the solid waste system in terms of lower collection costs, current and future system capacity, expanded and enhanced recycling services; environmental impacts; and self-haul for residents and businesses. We also agree with the report's basic assumption that any limitations on self-haul would not apply to customers with a division charge account, such as small businesses and contractors. Finally, we concur with the report's basic assumption that Bellevue and the point cities will leave the solid waste system after 2028; however, we still contend that cities that have not extended their interlocal agreements should be provided with a firm deadline (end of 2014) to do so or be precluded from returning to the system and that any city or cities not signing an extended ILA should be charged a rate differential to pay off its share of the bonded construction debt by 2028.

However, we strongly disagree with the proposed deferment of the closure of the Houghton Transfer Station beyond 2021. We request that the Division provide more information in the report's recommendation on the specific services and space that could be added to Factoria along with a justification for its request for additional time to conduct the study. The original 2006 Transfer Plan schedule for the closure of Houghton was 2015 which was unexpectedly delayed until 2018 and then recently pushed back to 2021. On September 17, 2013, the Kirkland City Council unanimously voted to approve Resolution R-5001 (attached) which asks King County to complete the improvements to the transfer system by 2021 and close Houghton. While we appreciate the Division's interest in studying whether additional space and services could be added to the new Factoria Transfer Station, any exercise undertaken to study space and additional services at Factoria could be conducted concurrent with the design and siting process for the Northeast Transfer Station which would result in the closure of the Houghton no later than 2021.

We also believe that closing the Houghton Transfer Station to commercial traffic after the opening of the new Factoria Station would result in a rate inequity to cities in northeast King County. Hauling distances would temporarily increase as commercial waste would have to be diverted to Factoria and haulers would pass on the increased hauling costs to the city rate payers through their individual contracts. Additionally, the partial closure of Houghton to commercial traffic without a firm date for full closure suggests that the station could remain open indefinitely to residential self-haul customers, potentially until Bellevue leaves the system in 2028.

The County needs to demonstrate that it can keep its promises made in our MOU and the adopted Transfer Plan to the City of Kirkland and its residents in exchange for allowing repairs and infrastructure improvements to the Houghton Transfer Station in 2009 and 2010. King County has not made the case in the materials provided to date that Houghton needs to remain open, for either commercial or self-haul beyond the already significantly extended date of 2021. We therefore request that King County begin a siting study starting in 2014 of either a new NE Transfer Station Site, or an expanded Factoria, such that the closure of Houghton can proceed as planned.

Best regards,

John MacGillivray

Solid Waste Programs Lead
City of Kirkland | Public Works
(425) 587-3804
jmacgillivray@kirklandwa.gov

From: Yates, Diane [mailto:Diane.Yates@kingcounty.gov]
Sent: Wednesday, October 09, 2013 2:51 PM
Subject: Draft Transfer Plan Review Report

Hello,

The draft Transfer Plan Review Report is now posted at the link below:

<http://your.kingcounty.gov/solidwaste/about/plan-review.asp>

We recognized at the beginning of the transfer plan review process that the task was tall and time was short. We want you to know that we appreciate the time commitment you made to participate in this process. We value your input and look forward to continuing to work with you. Your input, along with the efforts of division staff in researching and analyzing all the alternatives, resulted in a draft report that we believe represents the best options for the region.

The comment period is now open. Please submit comments on the draft report in writing to me. Comments are due no later than October 23rd. All written comments will be considered and a final report will be released on November 27th.

Sincerely,

Diane Yates

Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104
206-477-5212

RESOLUTION R-5001

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF KIRKLAND ADOPTING A POSITION STATEMENT ON THE CLOSURE OF THE HOUGHTON TRANSFER STATION, THE CONSIDERATION OF LIMITING SELF HAULING AT TRANSFER STATIONS AND THE ESTABLISHMENT OF DIFFERENT CUSTOMER CLASSES TO AVOID DISPROPORTIONATE FINANCIAL IMPACTS ON THOSE WHO SIGNED THE AMENDED AND RESTATED INTERLOCAL AGREEMENT THROUGH 2040.

WHEREAS, King County Solid Waste Division (KCSWD) has owned and operated the Houghton Transfer Station in the City of Kirkland for many years; and

WHEREAS, it has been the goal of the City to close this facility for many years because it does not meet the majority of criteria necessary for a safe and modern transfer station and is the only transfer station located entirely within a residential neighborhood with only local access; and

WHEREAS, with the assistance of the Metropolitan Solid Waste Advisory Committee (MSWAC), KCSWD has been formulating a Solid Waste Transfer and Waste Export Plan that results in the closure of the Houghton Transfer Station as well as considering alternative plans for handling solid waste in King County; and

WHEREAS, concurrently with this effort, the County was negotiating with a number of cities the Amended and Restated Interlocal Agreement (Amended ILA) that would extend the duration of the Amended ILA and by which the Cities using KCSWD facilities would continue to be part of the KCSWD system; and

WHEREAS, failure of some of the cities to agree to the Amended ILA will have disproportionate financial impacts on the cities that did sign if no differential solid waste rate is established; and

WHEREAS, the Kirkland City Council approved the Amended ILA on February 19, 2013, based in part on assurances by the KCSWD that the Houghton Transfer Station would be closed and that a differential solid waste rate would be established; and

WHEREAS, the Council wishes to present a Position Statement to KCSWD as to its preferences in these matters,

NOW, THEREFORE, be it resolved by the City Council of the City of Kirkland as follows:

Section 1. The City Council adopts the attached Position Statement, which is incorporated by reference, recommending 1) to provide the County sufficient time to site, design, construct, and commission facilities to serve them, Bellevue and the other cities who have elected not to extend their contracts for solid waste disposal with

CITY OF KIRKLAND

KING COUNTY SOLID WASTE TRANSFER AND WASTE EXPORT PLAN POSITION STATEMENT

Regarding Houghton Transfer Station, Self-Hauling and Financial Impacts

September 17, 2013

The current adopted Solid Waste Transfer System Plan of 2006 is the preferred plan, having been arrived at by significant and long regional negotiation. That Plan has been called into question by the City of Bellevue and four satellite cities when, unlike other cities in the King County Solid Waste (KCSW) service area, they elected not to extend their contracts with King County for solid waste disposal beyond 2028. By not extending the contract, Bellevue and the satellite cities are signaling they will be leaving the system by 2028.

The King County Solid Waste Division (KCSWD) is now not planning to include Bellevue and the other cities' tonnage, which comprises about 10% of the entire system and 50% of the tonnage processed by the Factoria Transfer Station in Bellevue. Yet the KCSWD has not proposed differential solid waste rates to account for the financial impact of these cities leaving the system as the KCSWD continues to state hope that Bellevue and the other cities will change positions and remain within the KCSW system. This has resulted in adverse impacts and uncertainty to those cities that elected to extend their contracts to 2040, and in particular to the City of Kirkland, the host of the Houghton Transfer Station. The closure of Houghton has been predicated on the construction of Factoria and a new northeast transfer station. There needs to be sufficient time to site, design, construct and commission operation of a transfer station. This may take 10-15 years even though solid waste transfer stations are essential public facilities under the Growth Management Act (GMA). Therefore, the issue of whether Bellevue and the other cities will change their positions must be resolved.

- 1. Position Statement Regarding Planning Assumptions and Timing:** To provide the County sufficient time to site, design, construct, and commission facilities to serve them, Bellevue and the other cities who have elected not to extend their contracts for solid waste disposal with King County should be provided until the end of 2014 to extend their ILAs, beyond which they will be precluded from returning to the system. In the meantime, planning for cities remaining within the system will proceed without tonnages of those leaving the system and on the assumption that Bellevue and the other cities will not be remaining in the system after 2028.
- 2. Position Statement Regarding the Houghton Transfer Station:** Construct the new Factoria Transfer Station as currently designed as soon as possible. Initiate a siting process in 2014 for an expanded Factoria on the Eastgate property or a new northeast transfer

station capable of handling the combined solid waste of the cities remaining in the County system at that time that cannot be handled by the new Factoria transfer station. Complete the expansion by 2021 and close Houghton Transfer Station.

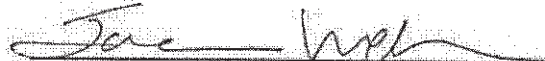
3. **Self-Haul Position Statement:** To limit cost and subsidy of self-haul services, both capital and operating, the KCSWD's Transfer Plan review should consider alternatives for limiting self-haul at existing transfer stations and in the design of new transfer stations while exploring disposal options for small business users who are not commercial haulers. Those using self-haul services that do not belong to the KCSWD system should be surcharged to recover the full cost of self-haul services.
4. **Rate Differential Position Statement:** Different customer classes should be established by King County to ensure system users do not pay a disproportionate share of the cost of improvements to system assets as a result of the decision by Bellevue and other cities not to sign an Amended and Restated Interlocal Agreement through 2040. The rate differential should be established to account for the full pay-off costs incurred for development of KCSWD system assets prior to the end of the mid-2028 Solid Waste Interlocal Agreement (SWIA) term. These rate differentials should reflect actual costs necessary for paying off construction bonds issued on behalf of the KCSWD with costs apportioned to the solid waste tonnage originating in those cities that elected to end their SWIA in mid-2028. The KCSWD should put verification measures in place that ensure any rate differential applies only to solid waste originating in cities that elected to end their ILA's in mid-2028, regardless if solid waste is self-hauled or delivered by a commercial carrier. The costs of any verification measures should be included in the overall rate differential applied to those cities that elect to end their SWIA in mid-2028.

King County should be provided a date certain in the near term beyond which they will be precluded from returning to the system; 2) a new transfer station should be constructed and the Houghton Transfer Station closed; 3) that King County Solid Waste Division's Transfer Plan review should consider alternatives for limiting self-haul at existing and new transfer stations, while exploring disposal options for small business users who are not commercial haulers; and 4) different customer classes should be established by King County to ensure that system users who extended contracts with King County do not pay a disproportionate share of the cost of improvements to system assets as a result of other Cities' decisions not to extend their contracts for solid waste disposal with King County.

Section 2. The City Council authorizes the City Manager or designee to present the attached Position Statement to KCSWD at its Final Transfer Plan Review Workshop on September 27, 2013, as well as for subsequent King County Council deliberations.

Passed by majority vote of the Kirkland City Council in open meeting this 17th day of September, 2013.

Signed in authentication thereof this 17th day of September, 2013.


MAYOR

Attest:


City Clerk

October 29, 2013



Executive Dow Constantine
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

RE: CITY OF KIRKLAND SUPPLEMENTARY COMMENTS
ON TRANSFER STATION PLAN REVIEW RECOMMENDATION

Dear Executive Constantine:

Thank you for the extended opportunity to provide comments on the recommendations made in the County's recent review of the Solid Waste Transfer and Export Plan. On September 17, 2013, the Kirkland City Council unanimously adopted a position statement concerning the Transfer Plan Review (attached). On October 16, 2013, Kirkland staff submitted comments on the Transfer Plan recommendation to the Solid Waste Division via email (attached). At the October 18, 2013 Metropolitan Solid Waste Advisory Committee (MSWAC) meeting, Kirkland staff verbally reiterated our comments to the County and the MSWAC membership.

We generally support the recommendation in the draft transfer plan of proceeding with the Base Alternative but downsized as necessary to accommodate the withdrawal of the City of Bellevue and similar communities that did not extend their contracts. However, the language below from the draft transfer plan creates a serious cause of concern.

TRANSFER PLAN REVIEW RECOMMENDATION:

*"Based on analysis of the alternatives and preliminary stakeholder feedback, the Division recommends proceeding with a variation of the Base Alternative which would include **deferring the opening date of the new Northeast transfer station so that the Division can assess the timing and potential phasing of the new station [emphasis added]**. This recommendation would proceed with construction of the new Factoria station as currently designed, **while studying whether additional space and services could be added to the new Factoria station that could affect a new Northeast station. With flexibility in the timing and scope of a new Northeast facility, the division would also evaluate options to further mitigate impacts on the Houghton neighborhood [emphasis added]**. Mitigation could include closing Houghton to commercial traffic between opening the new Factoria and final closure of Houghton **[no date provided]**. The project to site a new facility in the south county to replace the Algona Transfer Station would continue as scheduled. This variation on the Base Alternative recognizes the value of a regional system that provides equivalent services to all system ratepayers."*

I would like to strongly reiterate the Kirkland City Council's position that the Houghton Transfer Station should be closed as promised by 2021 in observance of King County's firm commitment to Kirkland in its 2005 Memorandum of Understanding and in the 2006 adopted Transfer System Plan. Please accept our supplementary comments below:

- We urge the County to begin the siting process for the NE Transfer Station in 2014 in earnest to ensure that construction is completed by 2021 and the Houghton Transfer Station closed.
- By the County's own admission, construction of the new Factoria Transfer Station as currently designed will not handle all the tonnage and services for northeast King County even when Bellevue leaves the system. A new NE transfer station, or an expanded Factoria Transfer Station, will be required in any case.
- By the County's own admission, it will take at least 3 years to do a siting study with or without including an expansion of the Factoria Transfer Station. It will then take 2 years for design and permits, and 2 years to build for a total of 7 years. If initiated in 2014 there is enough time for completion of the process in time to close Houghton on schedule by 2021. Delays for further studies can only delay the closure of the Houghton Transfer Station.
- The County should have adequate resources to complete the siting process of the Northeast Transfer Station concurrent with any study of the Factoria Transfer Station. During the siting process the size and services of the new facility would be determined.
- By the County's own admission, the expansion of Factoria in lieu of a new NE site will not require redesign and reconstruction of the Factoria facility as currently designed. The process undertaken to identify and/or purchase parcels in NE King County to site a new NE Transfer Station as compared to an expansion of Factoria are not mutually exclusive.

The City of Kirkland has been an accommodating host to a King County transfer station for well over 50 years and our residents and businesses have enjoyed its financial and convenience benefits, but also have shouldered the burdens associated with high volumes of traffic, noise and odors in a residential neighborhood. While Kirkland remains firmly committed to fulfilling its regional obligation to host critical public facilities, the Houghton Transfer Station has outlived its useful life, no longer meets any critical service criteria in the Transfer Plan, and our patient residents affected by the facility have been promised its closure by 2021. Mitigation at the Houghton Transfer Station is not what was promised. Closure is. Please remove any language in the Transfer Plan Review recommendation that would defer a siting study of a new NE Transfer Station thereby risking delay of the closure of the Houghton Transfer Station beyond 2021, and take actions in accord with this direction.

Sincerely,



Joan McBride, Mayor
City of Kirkland

Attachments (2)

Cc: Kirkland City Council
Kurt Triplett, Kirkland City Manager
Marilynne Beard, Kirkland Deputy City Manager
Pam Bissonnette, Kirkland Interim Public Works Director
John MacGillivray, Kirkland Solid Waste Programs Lead
Kevin Kiernan, Assistant King County Solid Waste Division Director
Jane Hague, King County Councilmember
Rod Dembowski, King County Councilmember

CITY OF KIRKLAND

From: Yates, Diane
To: John MacGillivray
Subject: RE: Draft Transfer Plan Review Report - KIRKLAND COMMENTS
Date: Wednesday, October 16, 2013 9:11:15 AM

Thanks John,

From: John MacGillivray [mailto:JMacGillivray@kirklandwa.gov]
Sent: Tuesday, October 15, 2013 3:27 PM
To: Yates, Diane
Cc: Pam Bissonnette; Kurt Triplett; Rob Jammerman
Subject: RE: Draft Transfer Plan Review Report - KIRKLAND COMMENTS

Diane,

We would like to thank the King County Solid Waste Division for the opportunity to participate in the review of the Solid Waste Transfer and Export Plan and recognize the Division for conducting such a thorough analysis within a compressed timeline.

We agree with the Base Alternative recommendation. While this alternative has the highest capital cost, it clearly provides the most value to our ratepayers and elegantly balances equity amongst all members of the solid waste system in terms of lower collection costs, current and future system capacity, expanded and enhanced recycling services; environmental impacts; and self-haul for residents and businesses. We also agree with the report's basic assumption that any limitations on self-haul would not apply to customers with a division charge account, such as small businesses and contractors. Finally, we concur with the report's basic assumption that Bellevue and the point cities will leave the solid waste system after 2028; however, we still contend that cities that have not extended their interlocal agreements should be provided with a firm deadline (end of 2014) to do so or be precluded from returning to the system and that any city or cities not signing an extended ILA should be charged a rate differential to pay off its share of the bonded construction debt by 2028.

However, we strongly disagree with the proposed deferment of the closure of the Houghton Transfer Station beyond 2021. We request that the Division provide more information in the report's recommendation on the specific services and space that could be added to Factoria along with a justification for its request for additional time to conduct the study. The original 2006 Transfer Plan schedule for the closure of Houghton was 2015 which was unexpectedly delayed until 2018 and then recently pushed back to 2021. On September 17, 2013, the Kirkland City Council unanimously voted to approve Resolution R-5001 (attached) which asks King County to complete the improvements to the transfer system by 2021 and close Houghton. While we appreciate the Division's interest in studying whether additional space and services could be added to the new Factoria Transfer Station, any exercise undertaken to study space and additional services at Factoria could be conducted concurrent with the design and siting process for the Northeast Transfer Station which would result in the closure of the Houghton no later than 2021.

We also believe that closing the Houghton Transfer Station to commercial traffic after the opening of the new Factoria Station would result in a rate inequity to cities in northeast King County. Hauling distances would temporarily increase as commercial waste would have to be diverted to Factoria and haulers would pass on the increased hauling costs to the city rate

payers through their individual contracts. Additionally, the partial closure of Houghton to commercial traffic without a firm date for full closure suggests that the station could remain open indefinitely to residential self-haul customers, potentially until Bellevue leaves the system in 2028.

The County needs to demonstrate that it can keep its promises made in our MOU and the adopted Transfer Plan to the City of Kirkland and its residents in exchange for allowing repairs and infrastructure improvements to the Houghton Transfer Station in 2009 and 2010. King County has not made the case in the materials provided to date that Houghton needs to remain open, for either commercial or self-haul beyond the already significantly extended date of 2021. We therefore request that King County begin a siting study starting in 2014 of either a new NE Transfer Station Site, or an expanded Factoria, such that the closure of Houghton can proceed as planned.

Best regards,

John MacGillivray

Solid Waste Programs Lead
City of Kirkland | Public Works
(425) 587-3804
jmacgillivray@kirklandwa.gov

From: Yates, Diane [<mailto:Diane.Yates@kingcounty.gov>]
Sent: Wednesday, October 09, 2013 2:51 PM
Subject: Draft Transfer Plan Review Report

Hello,

The draft Transfer Plan Review Report is now posted at the link below:

<http://your.kingcounty.gov/solidwaste/about/plan-review.asp>

We recognized at the beginning of the transfer plan review process that the task was tall and time was short. We want you to know that we appreciate the time commitment you made to participate in this process. We value your input and look forward to continuing to work with you. Your input, along with the efforts of division staff in researching and analyzing all the alternatives, resulted in a draft report that we believe represents the best options for the region.

The comment period is now open. Please submit comments on the draft report in writing to me. Comments are due no later than October 23rd. All written comments will be considered and a final report will be released on November 27th.

Sincerely,

Diane Yates

Intergovernmental and Legislative Liaison

Director's Office

King County Solid Waste Division

201 So. Jackson St., Ste. 701

Seattle, WA 98104

206-477-5212

RESOLUTION R-5001

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF KIRKLAND ADOPTING A POSITION STATEMENT ON THE CLOSURE OF THE HOUGHTON TRANSFER STATION, THE CONSIDERATION OF LIMITING SELF HAULING AT TRANSFER STATIONS AND THE ESTABLISHMENT OF DIFFERENT CUSTOMER CLASSES TO AVOID DISPROPORTIONATE FINANCIAL IMPACTS ON THOSE WHO SIGNED THE AMENDED AND RESTATED INTERLOCAL AGREEMENT THROUGH 2040.

WHEREAS, King County Solid Waste Division (KCSWD) has owned and operated the Houghton Transfer Station in the City of Kirkland for many years; and

WHEREAS, it has been the goal of the City to close this facility for many years because it does not meet the majority of criteria necessary for a safe and modern transfer station and is the only transfer station located entirely within a residential neighborhood with only local access; and

WHEREAS, with the assistance of the Metropolitan Solid Waste Advisory Committee (MSWAC), KCSWD has been formulating a Solid Waste Transfer and Waste Export Plan that results in the closure of the Houghton Transfer Station as well as considering alternative plans for handling solid waste in King County; and

WHEREAS, concurrently with this effort, the County was negotiating with a number of cities the Amended and Restated Interlocal Agreement (Amended ILA) that would extend the duration of the Amended ILA and by which the Cities using KCSWD facilities would continue to be part of the KCSWD system; and

WHEREAS, failure of some of the cities to agree to the Amended ILA will have disproportionate financial impacts on the cities that did sign if no differential solid waste rate is established; and

WHEREAS, the Kirkland City Council approved the Amended ILA on February 19, 2013, based in part on assurances by the KCSWD that the Houghton Transfer Station would be closed and that a differential solid waste rate would be established; and

WHEREAS, the Council wishes to present a Position Statement to KCSWD as to its preferences in these matters,

NOW, THEREFORE, be it resolved by the City Council of the City of Kirkland as follows:

Section 1. The City Council adopts the attached Position Statement, which is incorporated by reference, recommending 1) to provide the County sufficient time to site, design, construct, and commission facilities to serve them, Bellevue and the other cities who have elected not to extend their contracts for solid waste disposal with

CITY OF KIRKLAND

KING COUNTY SOLID WASTE TRANSFER AND WASTE EXPORT PLAN POSITION STATEMENT

Regarding Houghton Transfer Station, Self-Hauling and Financial Impacts

September 17, 2013

The current adopted Solid Waste Transfer System Plan of 2006 is the preferred plan, having been arrived at by significant and long regional negotiation. That Plan has been called into question by the City of Bellevue and four satellite cities when, unlike other cities in the King County Solid Waste (KCSW) service area, they elected not to extend their contracts with King County for solid waste disposal beyond 2028. By not extending the contract, Bellevue and the satellite cities are signaling they will be leaving the system by 2028.

The King County Solid Waste Division (KCSWD) is now not planning to include Bellevue and the other cities' tonnage, which comprises about 10% of the entire system and 50% of the tonnage processed by the Factoria Transfer Station in Bellevue. Yet the KCSWD has not proposed differential solid waste rates to account for the financial impact of these cities leaving the system as the KCSWD continues to state hope that Bellevue and the other cities will change positions and remain within the KCSW system. This has resulted in adverse impacts and uncertainty to those cities that elected to extend their contracts to 2040, and in particular to the City of Kirkland, the host of the Houghton Transfer Station. The closure of Houghton has been predicated on the construction of Factoria and a new northeast transfer station. There needs to be sufficient time to site, design, construct and commission operation of a transfer station. This may take 10-15 years even though solid waste transfer stations are essential public facilities under the Growth Management Act (GMA). Therefore, the issue of whether Bellevue and the other cities will change their positions must be resolved.

1. **Position Statement Regarding Planning Assumptions and Timing:** To provide the County sufficient time to site, design, construct, and commission facilities to serve them, Bellevue and the other cities who have elected not to extend their contracts for solid waste disposal with King County should be provided until the end of 2014 to extend their ILAs, beyond which they will be precluded from returning to the system. In the meantime, planning for cities remaining within the system will proceed without tonnages of those leaving the system and on the assumption that Bellevue and the other cities will not be remaining in the system after 2028.
2. **Position Statement Regarding the Houghton Transfer Station:** Construct the new Factoria Transfer Station as currently designed as soon as possible. Initiate a siting process in 2014 for an expanded Factoria on the Eastgate property or a new northeast transfer

station capable of handling the combined solid waste of the cities remaining in the County system at that time that cannot be handled by the new Factoria transfer station. Complete the expansion by 2021 and close Houghton Transfer Station.

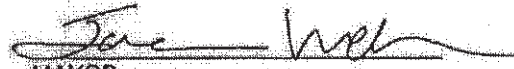
3. **Self-Haul Position Statement:** To limit cost and subsidy of self-haul services, both capital and operating, the KCSWD's Transfer Plan review should consider alternatives for limiting self-haul at existing transfer stations and in the design of new transfer stations while exploring disposal options for small business users who are not commercial haulers. Those using self-haul services that do not belong to the KCSWD system should be surcharged to recover the full cost of self-haul services.
4. **Rate Differential Position Statement:** Different customer classes should be established by King County to ensure system users do not pay a disproportionate share of the cost of improvements to system assets as a result of the decision by Bellevue and other cities not to sign an Amended and Restated Interlocal Agreement through 2040. The rate differential should be established to account for the full pay-off costs incurred for development of KCSWD system assets prior to the end of the mid-2028 Solid Waste Interlocal Agreement (SWIA) term. These rate differentials should reflect actual costs necessary for paying off construction bonds issued on behalf of the KCSWD with costs apportioned to the solid waste tonnage originating in those cities that elected to end their SWIA in mid-2028. The KCSWD should put verification measures in place that ensure any rate differential applies only to solid waste originating in cities that elected to end their ILA's in mid-2028, regardless if solid waste is self-hauled or delivered by a commercial carrier. The costs of any verification measures should be included in the overall rate differential applied to those cities that elect to end their SWIA in mid-2028.

King County should be provided a date certain in the near term beyond which they will be precluded from returning to the system; 2) a new transfer station should be constructed and the Houghton Transfer Station closed; 3) that King County Solid Waste Division's Transfer Plan review should consider alternatives for limiting self-haul at existing and new transfer stations, while exploring disposal options for small business users who are not commercial haulers; and 4) different customer classes should be established by King County to ensure that system users who extended contracts with King County do not pay a disproportionate share of the cost of improvements to system assets as a result of other Cities' decisions not to extend their contracts for solid waste disposal with King County.

Section 2. The City Council authorizes the City Manager or designee to present the attached Position Statement to KCSWD at its Final Transfer Plan Review Workshop on September 27, 2013, as well as for subsequent King County Council deliberations.

Passed by majority vote of the Kirkland City Council in open meeting this 17th day of September, 2013.

Signed in authentication thereof this 17th day of September, 2013.


MAYOR

Attest:


City Clerk

Mayor
Mary Jane Goss

17425 Ballinger Way NE
Lake Forest Park, WA 98155-5556
Telephone: 206-368-5440
Fax: 206-364-6521
E-mail: cityhall@ci.lake-forest-park.wa.us
www.cityoflfp.com



Councilmembers
Don Fiene
Tom French
Jeff R. Johnson
Sandy Koppenol
Robert E. Lee
Catherine Stanford
John A. B. Wright

October 22, 2013

Mr. Pat D. McLaughlin
Solid Waste Division Director
King County Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104

Dear Mr. McLaughlin:

The City of Lake Forest Park appreciates the efforts King County staff made in facilitating this review in such a timely manner. However, the short time frame for review and comments poses challenges and makes it difficult for cities to provide input and we recommend extending the comment period.

The City fully supports the Base Alternative, which constructs new transfer stations in Factoria, Northeast and South County. The City agrees with the study's findings that clearly support adequate solid waste transfer capacity for the growing population of both south and northeast King County. The City also values how this recommendation helps to ensure service equity throughout the regional system, while allowing lower costs for collection services over time.

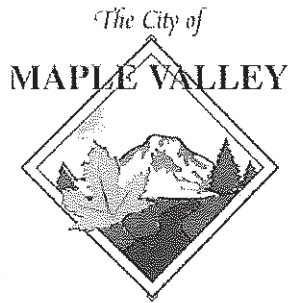
The report shows that lower operating costs, i.e., fuel, equipment and labor, will more than offset the projected capital cost of build the Base Alternative. Based on the Review's findings, the City supports continuing the transfer station siting process now underway for all of King County.

Sincerely,

A handwritten signature in black ink that reads "Mary Jane Goss".

Mary Jane Goss
Mayor

cc: City Council
Pete Rose, City Administrator



P.O. Box 320 • 22017 SE Wax Road • Maple Valley, WA 98038

Phone: 425-413-8800 • Fax: 425-413-4282

November 5, 2013

King County Executive Dow Constantine
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

RE: City of Maple Valley Comments on the Draft Solid Waste Transfer Plan Review

Dear Executive Constantine:

The City of Maple Valley appreciates the work done by King County Solid Waste Division staff in facilitating the 2013 review of the 2006 Solid Waste Transfer and Waste Management Plan.

Maple Valley supports the Base Alternative as recommended by the Solid Waste Division. Other alternatives that call for no Northeast or South County transfer station would result in increased collection costs to ratepayers in areas that are forecasted to experience the largest population growth through 2040.

The Base Alternative recognizes the value of a regional system that provides equivalent services to all system users. The City of Maple Valley supports the Solid Waste Division in moving forward with the South County transfer station siting process that is currently underway.

Thank you for considering the City of Maple Valley's comments.

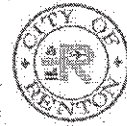
Sincerely,



William (Bill) Allison, Mayor
City of Maple Valley

C: Larry Gossett, Chair, Metropolitan King County Council
Reagan Dunn, Metropolitan King County Councilmember
Pat McLaughlin, Director, King County Solid Waste Division
Kevin Kiernan, Assistant Director, King County Solid Waste Division
Diane Yates, Intergovernmental Liaison, King County Solid Waste Division
City of Maple Valley Councilmembers

Denis Law
Mayor



Mayor's Office

October 31, 2013

Mr. Pat D. McLaughlin, Director
King County Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104

RE: Draft Transfer System Plan

Dear Mr. McLaughlin:

Thank you for hosting the recent workshops for interested stakeholders that provided context for the review of the King County transfer system. It is clear that a tremendous staff effort was made to provide new data and a thorough analysis of alternatives to the original base plan as stated in the 2006 Solid Waste Transfer and Waste Management Plan was performed.

Now that we have completed our review of the Draft Transfer Plan Review dated October 9, 2013, Renton's Administration confidently lends our support to the Base Alternative as originally proposed. Please note that this letter does not indicate Renton's position as established by the Renton City Council. The City Council will not have established a position by the November 1 due date for these comments.

With the Renton formal transfer station scheduled to close in 2018, the city of Renton is interested in maintaining comprehensive recycling and disposal services for its residents and businesses with equitable costs shared across the system. Because the city of Renton is uniquely located equidistant between the Bow Lake and Factoria transfer stations, it is important that we maintain access to facilities that adequately serve our customers and that meet all of the level of service standards developed in consensus with regional stakeholders.

While we recognize the Bow Lake transfer station is completed and currently provides full service, it is important to our residents and businesses that the Factoria transfer station be built as currently designed and permitted with a projected opening of expanded garbage service (2016) and recycle service (2017) before the Renton transfer station is closed. Additionally, we recognize the importance of pursuing both the Northeast and South County transfer stations in order to provide equitable services in

Mr. Pat McLaughlin

Page 2 of 2

October 31, 2013

areas of King County that are projected to experience the greatest population growth. Not building these two facilities will place additional burden on existing facilities and cause collection rates to increase for Renton customers, as well as for other South County communities that would be disproportionately impacted by the increased distance to available transfer stations.

In closing, I would like to thank the King County Solid Waste Division for the opportunity to provide Renton's voice in this important discussion about the future of our region's solid waste transfer and disposal system.

Sincerely,



Denis Law

Mayor

cc: Renton City Councilmembers
Jay Covington, Chief Administrative Officer
Gregg Zimmerman, P.E., Public Works Administrator
Lys Hornsby, P.E., Utility Systems Director
Linda Knight, Solid Waste Coordinator
Kevin Kiernan, King County Solid Waste Assistant Division Director
Diane Yates, King County Solid Waste Division Intergovernmental Liaison



October 23, 2013

Via Email

Ms. Diane Yates
Intergovernmental Liaison
King County Solid Waste Division
201 S. Jackson St. Suite 701
Seattle, WA 98104

4800 South 188th Street
SeaTac, WA 98188-8605

City Hall: 206.973.4800
Fax: 206.973.4809
TDD: 206.973.4808

**Subject: City of SeaTac Comments
October 9, 2013 Draft Transfer Plan Review**

Dear Ms. Yates,

The City of SeaTac wishes to express its appreciation for the efforts of the King County staff in quickly responding to the call to review the 2006 Solid Waste Transfer and Waste Management Plan. We do recognize, however, the review and comment period is challenging for cities to respond. Therefore, we respectfully request extending the comment period.

While the Bow Lake Transfer Station is technically located in the City of Tukwila, just beyond our city boundary, we in SeaTac are acutely aware of its tight entrance. The left turn pocket off of Orillia Rd. S. is less than 100 feet long. Traffic operations undoubtedly would reach unacceptable levels if Bow Lake were to serve the entire south county.

The City is in full support of the Base Alternative as recommended in the Transfer Plan Review. It avoids over burdening Bow Lake and provides lower operating costs for ratepayers. We also support the Review's recommended measures to reduce future expenditures and identify potential cost savings for each new facility.

Thank you for considering SeaTac's comments on the draft Review. If you have any questions, please contact Public Works Director Tom Gut at (206) 973-4741.

Sincerely,

Tony Anderson
Mayor

TA:lke

C: KCC Julia Patterson
KC SW Division Director Pat McLaughlin
Mayors of Burien, Des Moines, Federal Way, Normandy Park, Tukwila
SeaTac City Councilmembers
City Manager Todd Cutts
Public Works Director Tom Gut

Mayor
Tony Anderson

Deputy Mayor
Mia Gregerson

Councilmembers
Barry Ladenburg
Rick Forschler
Terry Anderson
Dave Bush
Pam Fernald

City Manager
Todd Cutts

Assistant City Manager
Gwen Voelpel

City Attorney
Mary Mirante Bartolo

City Clerk
Kristina Gregg



City of Tukwila

6200 Southcenter Boulevard • Tukwila, Washington 98188

Jim Haggerton, Mayor

October 22, 2013

Mr. Pat McLaughlin
Director, Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104

RE: 2013 Draft Transfer Plan Review

Dear Mr. McLaughlin,

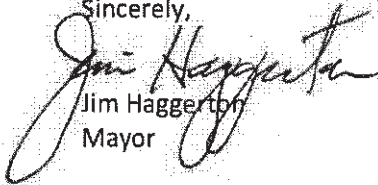
The City of Tukwila appreciates King County's efforts in facilitating the comprehensive review of the 2006 Solid Waste Transfer and Waste Management Plan (Transfer Plan). We compliment the County's Solid Waste Division Staff for conducting the review process in a collaborative, professional and transparent manner.

The City has reviewed the October 9, 2013 draft Transfer Plan Review Report. The following comments/recommendations are submitted for consideration:

- The short public comment period creates challenges for stakeholders to brief elected officials and obtain feedback prior to the October 23, 2013 public comment expiration date. Extending the public comment period for a week would be helpful.
- Tukwila fully supports the Solid Waste Division's recommendation to proceed with a variation of the Base Alternative that includes siting and construction of a South County Transfer Station. We are extremely concerned with the consequences of any alternative that eliminates a new South County Transfer Station. As highlighted in the review, any system configuration that does not include a new South County facility would create operational problems at the Bow Lake Transfer Station, increase collection costs for South King County residents and businesses, and would not accommodate the heavy population growth that is forecasted in the South County area.

Thank you for considering City of Tukwila's input regarding this important matter. Please call me at 206-433-1805 if you have any questions.

Sincerely,

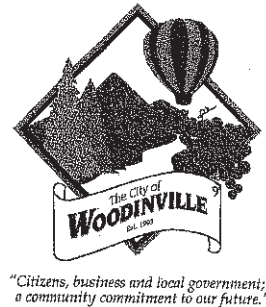


Jim Haggerton
Mayor

cc: Tukwila City Council Members
Bob Giberson, Public Works Director
Diane Yates, King County Solid Waste Division, 201 S Jackson St, Suite 701, Seattle, WA 98104

October 21, 2013

Mr. Pat McLaughlin, Solid Waste Division Director
King County Solid Waste Division
201 S. Jackson Street, Ste. 701
Seattle, WA 98104



Dear Mr. McLaughlin:

RE: Revised King County Solid Waste Transfer Plan

The City of Woodinville makes the following comments regarding the Revised King County Solid Waste Transfer Plan.

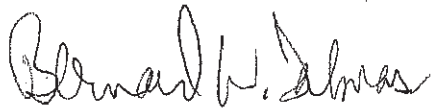
1. The impacts of constructing and operating a new Northeast Transfer Station are significantly understated and essentially ignored in the report. It is obvious, even to a casual observer, that enlarging and/or modernizing an existing Transfer Station has significantly fewer impacts than building a new facility in a completely different community.
2. The ability to use existing transfer stations (particularly an expanded Factoria Station) to accommodate future waste flows has not been adequately considered. It is entirely likely that expansion or modernization of existing facilities could accommodate future growth in the Northeast Region. It is also possible that transporting waste to these facilities will be financially and environmentally more beneficial than building a new Northeast Transfer facility.
3. A new Northeast Transfer facility should not be pursued until it can be objectively demonstrated there is a need for the facility and there are no reasonable alternatives. As mentioned above, this evaluation should consider the cost of transporting waste to existing facilities that have been expanded/modernized. Affected communities should determine whether they are willing to accept the additional transportation costs or the additional costs and impacts of a new Northeast Transfer facility.
4. If a new Northeast Transfer facility is warranted, it should be located in a community where the majority of waste is generated. This provides a clear link to the need and fairly assigns the burden to those who create it.
5. If a new Northeast Transfer facility is warranted, it should only be located in jurisdictions which offer to host it, otherwise, existing facilities should be expanded or modernized.
6. If a new Northeast Transfer facility is warranted, it should not be located in Woodinville. Woodinville already shoulders a disproportionate burden for the regional waste management infrastructure system. Woodinville has a regional recycling center that accepts waste streams from at least 36 municipal agencies covering six counties. Additionally, immediately on our northern boundary is the Brightwater Regional Wastewater Treatment Facility that serves the greater King County and southern Snohomish County areas. Clearly, from an environmental justice basis, Woodinville has already paid its fair share to the region.

Mr. Pat McLaughlin
October 21, 2013
Page Two

While we appreciate the effort to update this study, it commits to a course of action that may be seriously flawed and which could result in the unnecessary expenditure of hundreds of millions of dollars.

Respectfully submitted,

CITY OF WOODINVILLE



Bernard W. Talmas
Mayor

cc: King County Executive
King County Council
Sound Cities Association
Woodinville City Council
Woodinville City Manager

From: David Baker <dbaker@kenmorewa.gov>
Sent: Friday, October 18, 2013 9:29 AM
To: Yates, Diane
Subject: Transfer plan

**BAKER DAVID
(SOLID WASTE ADVISORY
COMMITTEE)**

Diane,

As a member of SWAC and MSWMAC I would like to see this process move forward. A lot of time and effort has been put into this and it is time to move forward with the adopted transfer plan. A lot of time and money has been spent to date and we need to focus our attention on other issues.

I am speaking for myself and not on behalf of my City or any group or committee.

David Baker

Please be aware that email communication with Council Members or City staff is a public record and is subject to disclosure upon request.

Jean Garber Comments on Draft Transfer Plan Review

First, I want to make it clear that although I am Chair of SWAC, the following comments on the Draft Transfer Plan Review report of October 9, 2013 are mine alone and are not intended to reflect the consensus of SWAC as a group.

1. I would like to thank Solid Waste Division staff for conducting such a thorough, well organized analysis of Transfer Plan alternatives, and for their prompt data-based responses to questions posed at the workshops.
2. I strongly believe that the County should implement a Transfer Plan that equitably distributes recycling and solid waste disposal services, and their attendant costs and environmental impacts, to ratepayers throughout the County. To that end, I concur with the analysis and recommendation in the Draft Transfer Plan Review report – that is, to proceed with a variation of the Base Alternative. Under that recommendation, the Solid Waste Division would have flexibility to reevaluate the timing and scope of a new Northeast recycling and transfer station, while proceeding to build the Factoria station as currently designed and continuing the current efforts to site a new station in the south county. The Division would also evaluate further options to mitigate impacts on the Houghton neighborhood while that facility remains open.
3. Under the approach recommended in the Draft Transfer Plan Review report, I believe the Division should not delay siting a Northeast transfer and recycling facility any longer than necessary to determine whether its design could be affected by adding some additional space and services to Factoria. If the siting of a Northeast facility is delayed too long, traffic and associated impacts at the new Factoria facility could exceed the levels evaluated in the EIS on that facility.
4. I believe the Division should continue to provide self-haul services at all its transfer and recycling facilities. Provision of self-haul services helps make these facilities a community asset. In addition, the ability to remove recyclable materials from self-haul loads is essential if the County is to meet its goal of 70% recycling.
5. I believe there should be a strong emphasis on value engineering in recycling and transfer station design, and that new facilities should have the flexibility to handle changes in waste-stream tonnage and composition.
6. I believe a system of recycling and transfer facilities equitably distributed throughout the county will provide for cost-effective solid waste management regardless of what disposal option is selected when the Cedar Hills Landfill closes.

Transfer and Waste Management Plan Review Comments

Prepared by:

Keith Livingston
King County Solid Waste Advisory Committee
Interested Citizen
Federal Way, WA

LIVINGSTON KEITH
(SOLID WASTE ADVISORY
COMMITTEE)

October 16, 2013

First let me thank the staff for preparing all the materials necessary for three public review workshops and managing the presentation of these materials in a format that allowed a courteous exchange of information and ideas. Their work on reviewing the Transfer Station Plan was initiated by King County Ordinance 2013-0258, Version 2. This Ordinance opened a discussion process on the Solid Waste Transfer Plan that was adopted in 2007.

Plan Review Comments – Based on Workshop #3 and Staff Recommendation

I concur with the recommendation made by the King County Solid Waste Division, which is as follows:

“Proceeding with a variation of the Base Alternative which would include deferring the opening date of the new Northeast transfer station so that the Division can assess the timing and potential phasing of the new station. This recommendation would proceed with construction of the new Factoria station as currently designed, while studying whether additional space and services could be added to the new Factoria station that could affect a new Northeast station. With flexibility in the timing and scope of a new Northeast facility, the division would also evaluate options to further mitigate impacts on the Houghton neighborhood. Mitigation could include closing Houghton to commercial traffic between opening the new Factoria and final closure of Houghton. The project to site a new facility in the south county to replace the Algona Transfer Station would continue as scheduled. This variation on the Base Alternative recognizes the value of a regional system that provides equivalent services to all system ratepayers.”

Ultimately the solid waste management needs of the County, supporting cities, self and commercial haulers are best served in the present and well into the future by having a robust and modern transfer station system. I believe the base option, with the modifications identified, provides the best service potential and resource flexibility to service King County's Inter Local Agreement member cities. As the process goes forward I add the following planning considerations for the system.

- Assure that the transfer station system has capability to manage tonnage growth in excess of current projections.
- Assure that as new transfer stations are designed and come online, they are designed to accommodate potential changes in material handling, transport methodologies and changes in waste stream characteristics necessary for the next generation disposal process chosen to replace Cedar Hills Landfill.
- Assure that waste diversion capability is maximized within the transfer system to facilitate achieving State recycling goals.

Management of capital costs is always a significant factor in making these types of decisions. When it became clear that:

- the projected monthly cost for the Base Option is reasonable at \$1.08 per household;
- capital costs are fixed;
- this cost difference was basically sixteen cents more than Options A and B per month for a strategically complete system;
- that hauling cost increases would be minimized for collection haulers and their customers;
- Options C and D along with their alternates were not functionally suitable in the opinion of this writer; and for those reasons,
- it became realistic and logical to support the Base Option.

This study also validated the work done previously by the King County Solid Waste Division and its reviewing bodies when they developed the existing Transfer Station Plan, which King County adopted in 2007. One of the overall goals of elected officials is to assure that costs are properly monitored and that service capability is designed to match the needs of current and projected service capacity, and the Base Option meets that criteria.

While not discussed at any of the review sessions, I'd like to reiterate to all concerned that solid waste disposal is uniquely a public health function. I recognize that as a service, solid waste collection and disposal has diversified into a multi-stream materials management operation. The challenge of meeting the State's goal of 70% recycling of the total waste stream will require a lot of service coordination, public education and creative use of the County's Transfer Stations. However, the underlying public health function of the County's solid waste system needs to always be a primary consideration as part of the planning, education and communication efforts undertaken by the system.

An element that was never very far from the surface at each of the review sessions was the challenge of Transfer Station siting. Solid waste facilities, unfortunately, often have a negative stigma that mobilizes the "NIMBY" (not in my back yard) factor. Therefore, to overcome this stigma the responsibility is on the County and each of us as participants in the process to work diligently to make each of the Stations, when sited and built, become not just a valued asset and resource in the greater community, but work to have them be valued by those who are affected by living or working in general proximity to these facilities. Job one going forward with the system's development is to assure these facilities function as good neighbors and be valued as an economic benefit within the cities and neighborhoods where they are located.

Having a state of the art transfer station system will give the County the ability to enter into next generation disposal discussions knowing that it has the flexibility to continue working on achieving the state's waste minimization goals, continue meeting its public health obligations, while having the capability and capacity to meet current and future collection needs as the County transitions to a new disposal paradigm.

Respectfully submitted,

Keith Livingston
King County SWAC
October 16, 2013

**SCHMIDT-PATHMANN PHILIPP
(SOLID WASTE ADVISORY
COMMITTEE)**

Comment to the King County Transfer Plan Review Report

10-22-2013

To Pat McLaughlin, King County Solid Waste Division Director:

Thank you for all your efforts and leadership on the King County Transfer Station Review Report and the 3 workshops that you and your team put together.

This is an official comment to the current planning process:

As a citizen of King County, a father of two children, as the Director of the NPO Zero Landfill Initiative and as a waste management professional I strongly recommend that utmost attention will be given to finding suitable alternatives to landfilling our resources.

We are still looking at our waste management infrastructure from the perspective of a disposal-oriented society. Waste is not waste, it is a resource of materials and energy that should not be 'wasted' in landfills as these engineered structures will fail (US EPA) and our taxes and resources will have to fix what could have been prevented in the first place.

Research has indicated that 1000s of jobs could be created in King County, millions of USD would be retained in the local King County economy, natural resources would be protected and 100,000s (US\$ 3-5 million of carbon credits using 3rd, California draft \$ value of \$15/CO2 credit) tons of climate damaging greenhouse gases (GHGs) would be avoided each year if we stop landfilling and instead promote, engage and develop alternatives to landfilling. Example Germany: by moving away from landfilling Germany created more than 350,000 jobs, retains over Euro 75 billion (over US\$ 100 billion annually) in the local economies and keeps between 30-70 million tons annually of CO2/Greenhouse Gas equivalent from further entering our atmosphere.

Part of achieving the objective of moving away from landfilling is deciding on how we build and manage our transfer stations.

As a participant of the 3 workshops, and from conversations with many cities of King County, I am very concerned that we are focusing on waste export to landfills to other parts of our state, into neighboring states or even to other countries rather than developing a comprehensive resource oriented infrastructure where landfills are considered outdated and not sustainable.

The majority of the hauling companies serving King County and surrounding area also own and operate their own landfills and have a vested interest in moving as much tonnage as possible to their landfills.

Cedar Hills, the last remaining open King County landfill, is estimated to close in approximately 2024. Experience has taught me that you cannot start a process early enough addressing what to do once this occurs. The planning process is a very slow process with many opinions and positions.

As a prerequisite to the planning process for our transfer stations, we need to identify adequate alternatives to the 'export to another landfill' option. This process needs to be a key component of the King County Strategic Plan and will greatly assist in the 'how to' and 'where' of potential transfer stations and their replacement or rebuild.

The process of how materials would be received at the transfer station as well as where they would go cannot adequately be addressed or planned until it becomes part of the structure itself. This again is only possible if a direction has clearly been identified.

I urge to halt any further development unless it is to protect the safety of the workers and customers as well as to allow continuous operations. Such options would be substantially less expensive 'fixes' rather than the very expensive rebuilds, for example the approximate US\$ 90 million of the Bow Lake transfer station (earthwork, utilities, compactors, property, easements etc).

The cost of having to incorporate a resource oriented concept after the transfer stations are built could be exponential, and render the export to distant landfills as the only financially feasible alternative. This would be a huge economic-ecologic loss to all citizens and businesses of King County.

A comprehensive plan including viable alternatives to landfilling needs to be developed first. Such a plan also needs to give adequate attention to assisting companies located within King County in achieving corporate zero landfill objectives, which many of them have.

Thank you for your attention in this matter,
Sincerely,
Philipp Schmidt-Pathmann
Co-Founder & Director, Zero landfill Initiative
Partner, NEOMER LLC
CEO and Founder, WRSI Consulting Group LLC

Cc:/ King County Executive Dow Constantine
Cc:/ King County Council

**AIGNER ROBERT
(HARSCH INVESTMENT
PROPERTIES)**

From: Robert Aigner <roba@harsch.com>
Sent: Monday, October 21, 2013 2:34 PM
To: Yates, Diane
Subject: Potential relocation of Algona Transfer Facility to Auburn

Hello:

I am Rob Aigner, Senior Vice President and Regional Manager for Harsch Investment Properties. We own the project known as West Park; a four building 273,000 SF multi-tenant industrial park located south of the proposed Auburn Transfer facility.

There are a number of reasons why we think the relocation from Algona to Auburn is a poor idea. The Transfer Plan Review has numerous shortcomings, some of which I would like to comment:

1. The report is misleading because there is references 'no ability to expand' onto the adjacent Algona land which is already owned by King County.
2. The report should address the expansion possibilities onto this land.
3. The statement that the current facility cannot be renovated to provide recycling services is misleading.
4. Bow Lake recycling opened just this month in October of 2013. We need to understand how this opening effects the entire system and its impact on other facilities.
5. We believe there is need for separate North King AND South King studies to performed.
6. How can both Renton and Enumclaw existing facilities be better utilized and incorporated into parts of this study?
7. Cedar Hills, with its projected close to happen 20140, needs to be addressed in this report. Can it become a transfer station site?
8. What are the plans/discussions around the potential for inter-modal facility?
9. The discussion of rates needs further and deeper discussion.
10. And finally, the report should remain a draft until the proposed 2014 King County Solid Waste rate study is issued and critiqued objectively.

We believe there is more time needed for public comment on this report. Please slow down and purposefully and adequately evaluate the need for an Auburn location.

Thank you.

Rob Aigner | Senior Vice President, Regional Manager Harsch Investment Properties, LLC
13228 NE 20th Street, Suite 300 | Bellevue, WA 98005 | ☎: 425.974-3200-direct | 📠: 425.649.8001-fax |
✉: roba@harsch.com

AIGNER ROBERT WITH BREKKE
JOHN; BREKKE-PARKS ELEANOR;
COTTER MIKE; CROCKETT RON;
HALL GUY; LANDRY TOM;

From: Robert Aigner <roba@harsch.com>
Sent: Monday, February 03, 2014 3:27 PM
To: kcexec@kingcounty.gov; Yang, Sung; Yates
Cc: natalie@nataliequickconsulting.com
Subject: North Auburn Transfer Station
Attachments: North Auburn Group Letter KCExec.pdf

MCKIM DAVE; PIETROMONACO
JOHN; SCOTT JEFF; SOUPLY TOM;
TEUTSCH JOHN; VANDERPOL ED

Dear King County Executive Constantine,

Attached you will find a letter from several key businesses and property owners in and around the proposed North Auburn transfer station site along West Valley Highway. Please consider this letter as part of public comment related to the King County Transfer Plan public comment period. We will also comment as part of the upcoming Algona EIS process.

We met recently with Sung Yang and Kevin Kiernan and had a productive discussion. We look forward to continuing this dialogue on behalf of our group, as well as the 300+ neighbors who oppose this location.

Thank you, and please let me know if you have questions.

Sincerely,

Rob Aigner
Harsch Investment Properties

Rob Aigner | Senior Vice President, Regional Manager Harsch Investment Properties, LLC
13228 NE 20th Street, Suite 300 | Bellevue, WA 98005 | ☎: 425.974-3200-direct | 📠: 425.649.8001-fax |
✉: roba@harsch.com

February 3, 2013

The Honorable Dow Constantine
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear King County Executive Constantine,

Our community group represents nearly every property owner located near 28721 West Valley Highway in Auburn, as well as many of the city's largest businesses and property owners. The site mentioned above is currently under consideration by King County as a possible location for a new \$127M South King County transfer station.

Please consider this letter our official public comment as part of the King County Transfer Station Plan public comment period.

Many of us have voiced concern throughout the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, agree with King County's ranking that a **North Auburn site is the least viable location for a new South King County transfer station.**

In addition, we have serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway.

Where's the Emergency?

Since King County's 2006 Transfer Plan, new stations totaling more than \$300M in public funds have been built in Vashon Island, Shoreline and Bow Lake, along with a permitted Factoria station.

Building four new King County transfer stations in just seven years is an astounding investment of public funds and it is clear we are not faced with a dire transfer station capacity problem now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

In addition, the current King County Transfer Station Plan, as well as the South King County Transfer Station Environmental Impact Statement, should fully include consideration of the following King County studies, which are currently underway:

- The Optimized Transfer Station Recycling Feasibility Study completed July 2013, with 139 recommendations yet to be implemented;
- Findings from a Sustainable Solid Waste Management Study, to be issued in the first quarter 2014;
- Incorporation of findings in the proposed 2014 Solid Waste Rate Study; and
- Consideration of how this new transfer station will impact the County's goals of 'Zero Waste' by 2030.

Eleanor Parks
Brekke Properties, LP
(425) 451-1511
eleanor@brekkeproperties.com

John Teutsch
Teutsch Partners, LLC
(206) 728-1130
jteutsch@teutsch.com

Dave McKim
Timberland Homes
(253) 735-3435
dave@timberland-homes.com

Ron Crockett
Emerald Downs
(253) 288-1700

John Pietromonico
HRP Properties
(206) 232-7502
johnp@hrpproperties.com

Tom Landry
Span Alaska Transportation, Inc
(253) 886-5200
tlandry@spanalaska.com

Jeff Scott
R.W. Scott Construction
(253) 351-0001
jeffscott@rwscottconstruction.com

Tom Souply
Span Alaska Transportation, Inc.
(253) 886-5201
toms@spanalaska.com

Ed Vander Pol
Oak Harbor Freight Lines, Inc
(253) 288-8300
Ed.VanderPol@oakh.com

Mike Cotter
Omega USA, Inc
(253) 804-6000
mcotter@omegasainc.com

Guy Hall
A & G Machine
(253) 887-8433
guy.r.hall@agmach.com

CC:

Sung Yang
Pat McLaughlin
Diane Yates

**ANONYMOUS AUBURN
CITIZEN**

From: SWD, WebSite
Sent: Tuesday, October 22, 2013 11:28 PM
To: SWD, WebSite
Cc: Yates, Diane; Gaisford, Jeff; Severn, Thea
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Auburn resident
ADDRESS: Auburn, WA, 98001
EMAIL:
COMMENTTYPE: Request
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: Dear Miss Diane Yates,

As a long time resident in Auburn, my family and I would like to request King County not to build another transfer station, but rather enhance the ones that are currently in use. Not only additional facilities will increase the burden on the county budget, the property value in the vicinity will also be greatly impacted and so are resident's quality of life.

Therefore, please do not additional sites and use the funds else where that is critically need (i.e. public schools, police, fire department, hospital).

Thank you for your time.

Auburn resident
IMG_VERIFY: DVB

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 10/22/2013 11:27:37 PM

ARROYO LILLIAN

From: liroya@aol.com
Sent: Tuesday, October 22, 2013 12:35 AM
To: Yates, Diane
Subject: Garbage Transfer Station

Hi Ms Yates,

I am Lilian Arroyo and my husband Roy Arroyo respectfully object on building a Garbage Transfer Station closed to our backyard at 28721 and West Valley Hwy in Auburn. These roads are so congested as it is right now with semi trucks as this is an industrial area . There are also some businesses over there that is making the road so busy with a lot more trucks.

Aside from the reason above, this is a big neighborhood that has a lot of children and old people that will be affected by the bad smell. My grandson has asthma and this will be bad for his asthma. You wouldn't want him to be in the hospital and miss his school all the time.

Thank you and I hope you will consider our request. You will help us get a healthy living thus helping the community in general.

Roy and Lilian Arroyo
29616 58th Place So
Auburn, WA. 98001

Sent from my iPad

From: FARLEY <farleyb01@comcast.net>
Sent: Thursday, January 23, 2014 10:56 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Cc: farleyb01@comcast.net; marilynenorton
Subject: We Oppose the North Auburn Garbage Site!

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary. Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,
Farley Bachtiar

From: Claire Bonin <claire@bicyclepaper.com>
Sent: Saturday, February 01, 2014 4:26 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: No North Auburn Dump

February 1, 2014

To King County Executive Dow Constantine, King County Council, and Solid Waste Division:

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Claire Bonin

12248 Roseburg Ave S

Seattle, WA 98168

From: Steve Bosley <s_bosley@msn.com>
Sent: Tuesday, January 28, 2014 7:55 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Cc: Steve Bosley; teamburget@yahoo.com; marilyncaretti@comcast.net; banjojunkies@comcast.net; dcgenzlinger@hotmail.com; gregpe@live.com; stanton.richard@gmail.com; hisaman@comcast.net; carlahenry2@gmail.com; dfpepper@comcast.net; helenpepper@hotmail.com; mattman52@live.com; doubletalliced@msn.com
Subject: Auburn Garbage Transfer Site

Good Morning,

I am writing to oppose the development of a new multi-million dollar garbage transfer station at 28721 West Vally Highway in Auburn. I concur with the county's evaluation that this site is the least desirable of all possible South King County alternatives.

I strongly urge the county to study other options beyond what has been put on the list thus far. King County has spend over \$300MM to build new garbage transfer stations in just the past seven years. We do not need to develop an additional one, especially with the recent renovation of the Bow Lake site.

I urge the council to renovate and expand the current Algona site instead. Reported studies by the County show that renovation would be far less expensive than the development of a new site.

Again, please find another solution to this problem.

Sincerely,

Steve Bosley

From: Bill Boyd <bill_boyd@mac.com>
Sent: Friday, January 31, 2014 10:23 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: I oppose building a transfer station at 27821 West Valley Highway in North Auburn

I live less than a mile from the 15 acres designated by King County Solid Waste as the “preferred site” for a new South King County transfer station. I began researching this project because it’s so close to my house. But I have come to oppose putting a transfer station in North Auburn for more significant reasons:

- It’s a poor choice of locations with regard to the environment (including the fact that this is a greenfield site on what are at least partly wetlands).
- The transfer station would be built immediately adjacent to a significant residential neighborhood where children live (I urge you to come take a look).
- South King County is already shouldering its share of the county’s solid waste burden.
- This project would be far more expensive than potential alternatives.
- It’s not yet clear that the site is really needed.

For all these reasons, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

In my view, the county should have a clear roadmap to 2040, including meeting the goal of Zero Waste by 2030 and determining what will happen when the Cedar Hills landfill closes. Those two factors could negate the need for additional transfer station capacity in this area. It would be less than responsible to spend \$127 million unless we’re absolutely certain that the additional capacity will be needed — and needed in this part of the county.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Bill Boyd
5282 S. 285th Street

Auburn, WA 98001
206.604.6825
bill_boyd@mac.com

BREKKE DANA

From: Brekke Dana <dlbrekke@gmail.com>
Sent: Friday, November 01, 2013 2:12 PM
To: Yates, Diane
Subject: Attached comments for the Draft Transfer Station Report
Attachments: Draft Transfer Comments Nov 2013.pdf

Diane,

Please accept the attached comments for the Draft Transfer Station Report.

Thank you,

Dana Brekke
dlbrekke@gmail.com
425.688.1711

Hello,

The purpose of this email is to let you know that the comment period for the Draft Transfer Plan Report has been extended to November 1, 2013. Comments received before November 2nd will be included in the responsive summary of the final report, which will be released on November 27th. We are happy to review any comments or questions received after November 1st, but it may not be possible to include them in the report.

Please let me know if you have any questions.

Sincerely,

Diane Yates

Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

Please note that my phone number has changed to: 206-477-5212

Draft Transfer Station Report - Comments

November 1, 2013

1. The overall pursuit of alternatives even be it incremental improvements or changes are missing, thereby not arriving at the best solution for ratepayers. Solid Waste is overlooking the intent of Ordinance 17619.
2. Given the lack of innovation and Solid Waste's desire to continue with a minor variation of the Base Plan (possibly phase North King County), a third party independent review is necessary. An independent review happened in the original 2006 Plan and therefore it is important to do so now, if not more important given King County Solid Waste's position. Had King County Solid Waste demonstrated they are thinking outside the box in the Review and thorough in its reporting it may not be necessary, but because King County Solid Waste has not done so it is necessary to consult with an unbiased, independent 3rd party.
3. The report should detail out the specifics of failure for each criteria for each location and include the degree of failure and date of any future failures. King County Solid Waste should study how each failure can be improved upon or overcome. Incremental improvements will extend the life of transfer stations and provide future flexibility in the system. There are advantages to waiting before spending millions on a new transfer station.
4. KCSW should make at least some suggestions or modifications on how the private sector could positively impact the transfer stations and reduce the need to build new stations. Stakeholders are looking for solutions in as many areas as possible and the private sector can help. The private sector has the ability to reduce the demand on transfer stations.
5. Since the approval of the 2006 plan, King County has acquired additional adjacent land which can be used to make level of service improvements. Please evaluate how this additional land can be used to make improvements other than replacement of the existing Algona facility.
6. We have an existing transfer system that has some strategically located new stations that can work together with the older stations. Together we can extend the life and use of what is currently in place without building new stations.
7. Rather, upon review, King County Solid Waste is continuing to push through on its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan but in part to determine if changes could be made that could reduce future expenditures.
8. We need processing technologies to increase diversion exist to address the commercially collected and self-hauled material streams delivered to the County's facilities. There are a limited number of commercially viable technologies for treating commercially collected residual waste: § Advanced Thermal Recycling/Waste-to-Energy – a process of generating energy in the form of electricity and/or heat from the incineration of waste. § Mechanical Processing to Create Refuse Derived Fuel – a fuel produced by shredding and dehydrating waste into fuel pellets. The pellets are then burned in a waste-to-energy facility or another industrial facility such as a cement kiln. § Mechanical Biological Treatment - a type of waste processing facility that combines a sorting facility with a form of biological treatment

Draft Transfer Station Report - Comments

November 1, 2013

- such as composting or anaerobic digestion. King County should study these options in this report and more fully before proceeding with new transfer stations.
9. The report should provide an overall openness to consider other alternatives. The references to failure are not appropriate when alternatives exist to extend the life of our existing transfer stations.
 10. King County should align policies, fees, and regulations to emphasize, incentivize, and compel reuse and recycling of waste toward Zero Waste of Resources.
 11. County facilities are to take a more active role in diverting reusable products and materials from its waste stream, King County Code regarding salvaging and scavenging should be altered to reflect that priority.
 12. Show how Solid Waste is incorporating the 139 potential new strategies that were recommended in the July 2013 Optimized Transfer Station Recycling Feasibility Study into future and current transfer stations. Implementing the 139 recommendations and new recycling strategies in the July 2013 HERRERA Optimized Transfer Station Recycling Study will drastically change transfer station usage, demand and physical requirements.
 13. Most of the recycling is currently done outside the main transfer building. Recycling can be implemented at existing sites that do not have it. Please start implementing existing recommendations that do not require a decision on a new transfer station and will require a lower level of capital cost.
 14. King County SW needs to study the option of co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities.
 15. As King County proceeds to modernize its transfer system with the siting, design, and construction of new facilities, and the updating or moth-balling of others, stark choices exist:
What is an appropriate level of recycling to accomplish at existing and new facilities?
Should the County do material processing itself to accomplish its Zero Waste goals? At what level?
What type of partnership should the County have with the private sector?
What is the best mix of facilities (and where should they be) to maximize diversion efficiently?
 16. There were numerous functional and service alternatives were not fully explored. These include further options of continuing use of existing transfer stations for various types of users, changes in operating hours, development of new class of small business haulers, addition of services on adjacent land, and use of private service providers.
 17. We should eliminate the acceptance of most standard curbside recyclables at transfer facilities, as it is more efficient and cost effective to collect them at the curb. The space and resources at the stations could be used instead for collection of other materials that are not easily collected curbside.
 18. It is estimated that its transfer stations and landfill received about 90,000 mattresses weighing more than 3000 tons for disposal in 2011. A policy should be developed to ban the disposal and recycle of these 90,000 mattresses.

Draft Transfer Station Report - Comments

November 1, 2013

19. Please explore options such as 75% of system users within 35 minutes travel time. Options like this were not explored in the report.
20. We need to study the option of using storage capacity at newer transfer stations such as Bow Lake in an emergency and limiting emergency service at older facilities such as Renton or Algona. The report should study the option of trailer storage of refuse on the adjacent land that King County owns in Algona and other facilities.
21. The use of privately owner transfer stations and recycling centers and how they might substitute or supplement King County owned facilities should be studied.
22. The KC RPC was very concerned about the lack of time to process and comment on the draft report. Please recommend more time for the involvement of stakeholders.
23. Upon issue of the this report, public perception is such that Solid Waste is pushing its agenda through at any expense.
24. Extending the life, remodeling and enhancement of the existing transfer stations will maximize rate payer value and provide rates as low as reasonably possible. This is achievable especially will some compromise on level of service objectives.
25. The recommended changes found in audits and 3rd party reports from GBB report in 2007 and HERRERA report in 2013 have not been incorporated into the Transfer System Plan and this report.
26. Processing recycling at Bow Lake and Shoreline is possible but would require extensive operational changes. Solid Waste should implement and understand tipping floor sorting and recycling before building new \$80 million transfer stations that might warrant changes.
27. Emergency storage for disasters can be achieved using extra capacity on the inside of newer transfer stations. In the event of a disaster, waste can also be directed from older transfer stations to newer transfer stations or to transfer stations outside the disaster area. Disaster refuse can also be stored in trailers at existing transfer stations and on adjacent land already owned by King County at locations such as Algona. Temporary direct haul Cedar Hills Landfill can be used in the event of a disaster. King County can also pursue disaster agreements with Seattle Solid Waste, Tacoma Refuse and other municipalities. Please incorporate these options into the study.
28. A reduction in staff and lost jobs at King County Solid Waste would be a potential result in not building new transfer stations. KCSW staff could be biased in the preparation and presentation of information. A third party report will help insure the overall task and information is being processed in the most unbiased manner.
29. The Bow Lake Transfer Station has extra land available. Please note this in the report and how this land can be used to mitigate changes and increased demand in the future.

Draft Transfer Station Report - Comments

November 1, 2013

30. The report should study the options and impacts of more participation with private service providers as noted in Milestone Reports. Many dates, costs and factors have changed since these reports have been issued.
31. Policy and program initiatives resonated as the top opportunities from outside research that have real potential for King County, and address the primary constraints identified: Maximize the use of disposal bans where markets are in place in order to divert materials and products to the appropriate private reuse and recycling infrastructure. Refine the use of recycling fees to emphasize curbside collection of traditional recyclables and to create more opportunity for other targeted materials. Enhance program initiatives in product stewardship and use public collection and processing infrastructure to leverage existing or developing private collection and processing infrastructure. Refine waste acceptance and handling policies that restrict more active involvement by County staff in facilitating diversion of materials to reuse and recycling.
32. A new Interlocal Agreement was just adopted and new language, provisions, policies and requirements are contained in the newly signed agreement. Please review these changes and how they impact the overall Solid Waste Plan and the Transfer System Plan.
33. More alternatives and or combinations of alternatives need to be studied in this report. Additionally options on how they get purposed whether it be for self-haul, commercial haul, yard waste or recycling.
34. Costs need to be presented in a systematic manner with incremental costs presented for each station being remodeled in addition to the proposed rebuild. Costs figures need to be presented in a more incremental way. Solid Waste has lumped alternatives together which could be appropriate but in doing so confuses the reader and also presents the information in a complicated manner
35. King County SW is scheduled to conduct a rate study in 2014. The rate study and results should be incorporated into this report. A rate study has not been done for a number of years.
36. King County Solid Waste disposal rates are significantly lower than the tipping fees in adjacent jurisdictions. How will changes in rates affect future system demand and reduce the need to build new transfer stations?
37. Development of a framework for financial policies and host city mitigation, including compensation agreements needs to be studied in this report.
38. Shoreline and Bow Lake capital costs should be paid off before 2028 because of the withdrawal of Bellevue and other cities from the interlocal agreement.
39. The City of Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 – 2028. This affects the Houghton Transfer Station and Bellevue. This is a short term problem and therefore a short term solution is warranted. By continuing with the long term plan and if cities do not renew the Inter Local Agreement then there are fewer people to share the capital costs. Changes to the ILA's and the cities participating in the system will impact the development and configuration of the system, future capital investments, services and rates.

Draft Transfer Station Report - Comments

November 1, 2013

40. Study the benefits of restricting use or changing the rates for users from Pierce County using the Algona Transfer Station. Study the benefits of restricting use or changing the rates for users from the City of Seattle using Bow Lake, Renton and Shoreline Transfer Stations.
41. Please study the benefits of restricting use or changing the rates for users from the City of Bellevue after the year 2028 using Factoria and Houghton Transfer Stations.
42. Please study extending hours of operation at each station as a means to mitigate wait times and provide further options for both commercial and self-haul.
43. Please mention currently used private transfer stations in use for yard waste, recycling, construction debris and refuse.
44. Study the alternative whereby no transfer stations are closed and transfer stations are remodeled with commercial service remaining at all locations. This alternative will likely result in the lowest collection costs and therefore an important alternative to consider in this report.
45. Traffic studies should be performed. Specific frequency and length of wait times should be studied at each station.
46. An overall rate study on collection costs and other costs should be performed.
47. Cities negotiate contracts with their haulers and should be given time to discuss options and costs with their current haulers and other potential haulers.
48. Please include the impact of the possible future changes Cedar Hills Landfill rent payments to users for the use of Cedar Hills Landfill.
49. Include possible future costs to haul waste outside King County when Cedar Hills Landfill is projected to reach capacity in 2028 which is before the end of this study and the ILA in 2040.
50. Please further study all original 17 level of service criteria and recommend even small changes that will help improve the transfer system or specifically reduce the need to new transfer stations.
51. Specify details of frequency of failure and possible solutions to minimize failure. Please note the option of current and future additional rural drop boxes to help provide options and mitigate drive times.
52. The transfer station scoring system is too negative in its rating scale. A wait time slightly exceeding 10% would equate to failure and this over dramatizes the wait time issue. Please be transparent in the presentation of information and don't project a bias.
53. King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility in addressing "issues". Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Draft Transfer Station Report - Comments

November 1, 2013

54. Completely explore options, incentives, restrictions, policies and changes with self-hauling. A combination of changes to self-hauling with extend the life and potentially reduce demand on the transfer station system. Increasing tipping and self-haul rates to meet or exceed neighboring municipalities such as Seattle, Tacoma and Pierce County will reduce demand on our transfer system. Please specifically study the elasticity and changes to rates and tipping fees.
55. Please report on the increased use and of alternative fuels such as compressed natural gas by commercial haulers.) The report should mention that new trucks are also more fuel efficient.
56. Please study the impact of potential increased use of onsite waste compactors by commercial property owners and apartments thereby dramatically reducing traffic and GHG emissions.
57. Study whether King County should co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities?
58. Should King County construct a regional resource recovery park for multiple recyclable and compostable materials at a new site and how will this affect the overall transfer station system?
59. Should King County site, design and build new King County solid waste facilities to align collection and processing in advanced materials management system and how would this affect transfer stations?
60. Please look at not closing Renton, Houghton and Algona transfer stations and further evaluate alternatives around these.
61. Renton is closed in all alternatives and this affects South King County where a new transfer station is being considered. It makes no sense to close the Renton transfer station thereby causing system constraints that lead to building a new location. Evaluate keeping Renton open in all alternatives.
62. King County code (KCC 10.12.021.G) allows fees for recycling to be set lower than those for disposal to encourage recycling over disposal. The use of differential fees is an important tool for increasing reuse and recycling. Please study the impacts of changes in fees and future needs of transfer stations.
63. Numerous cities in King County do not require curbside recycling and please study the impacts of this in the report.
64. *The mission of King County's waste reduction and recycling programs is to divert as much material as possible from disposal in a manner which reduces the overall costs of solid waste management to county residents and businesses, conserves resources, protects the environment and strengthens the county's economy. The draft 2013 Comprehensive Solid Waste Management Plan should be updated and incorporate the July 2013 HERRERA Optimized Transfer Station Recycling Study before issuing the 2013 Comprehensive Solid Waste Management Plan in its final form.*
65. The 2013 HERRERA Optimized Transfer Station Recycling Study presented 139 recycling strategies and these were allocated among station generations as follows: • Sixty-four (64) strategies were applicable to all stations • Seven (7) strategies were applicable to older stations only • Forty-one (41) strategies were applicable to updated/retrofitted stations AND new stations • Fifteen (15) strategies were

Draft Transfer Station Report - Comments

November 1, 2013

- applicable to new stations only. These 139 strategies need to be fully considered before building or closing any transfer stations.
66. SWAC and MSWMAC and KCSW should review the July 2013 HERRERA Optimized Transfer Station Recycling Study and consider revising the Recycling Scenario 3 before this Draft Transfer Station Plan Review is adopted. What if we adopt another and more rigorous Recycling Scenario is liked and how would this change transfer system demand and requirements?
 67. The report should attach the HERRERA Optimized Transfer Station Recycling Feasibility Study done in July 2013 to this report in both the Appendices and also in the body of the report under recycling and other sections.
 68. Disposal bans at transfer facilities for priority materials such as clean wood, scrap metal, yard (and land clearing) waste, mattresses, and cardboard are not being used to the maximum extent possible to advance Zero Waste of Resources goals.
 69. Overall recycling and zero-waste initiative goals are lacking in this report and have a very significant influence on how we use the King County Transfer System.
 70. A fee on traditional material recycling at transfer stations should compel customers to place them into the curbside collection system, if it is available, rather than travel to transfer facilities. This reduces vehicle travel overall, and produces fewer emissions.
 71. Please spell out specifics on when limitations are put on recycling because of system constraints. Such as in what year and how often recycling and other service capacities are overloaded?
 72. Drive time maps have multiple overlaps whereby 90% of users can still choose other transfer stations or regional drop boxes to access. Please make sure this is option is clear to the readers of this report.
 73. Please apply the 17 criteria in the report to each transfer station facility and do not lump into alternative groups.
 74. The report should suggest ways to meet criteria at each location and also as a group. Ideas include keeping Renton open, creating new alternatives, additional remodel, and use of adjacent land.
 75. The report should evaluate the use of the additional land that King County purchased in Algona. This can be used as expansion space for Algona while keeping or remodeling the current structure. It is a major oversight not to consider how this additional land can be used to meet current needs, add services or come closer to meeting criteria.
 76. There exists an opportunity for thinking differently about the flow of material, such as partnering with Cities for alternative spaces and drop box sites using City real estate. Please study this opportunity in the report.
 77. The cities of Auburn and Algona have also expressed concern about the 3 replacement sites being evaluated for South King County. The City of Bellevue and the City of Kirkland are the only one's mentioned that have concerns about siting.

Draft Transfer Station Report - Comments

November 1, 2013

78. The Houghton station has adjacent land that can be used to add some recycling and/or other services or improvements.
79. What would it cost to add compaction in Houghton and other potentially remodeled transfer stations? Please include this in the report.
80. Shoreline is in a residential area and has increased hours of operation why is Shoreline different than Houghton? Please provide equity in evaluating transfer stations.
81. Please evaluate extending hours of operation at transfer stations for all alternatives studied and how this specifically would impact wait times.
82. At what specific times and year would Bow Lake need to be limited to self-haul and recycling?
83. Bow Lake has some additional land that can be used to help provide capacity. Please study the additional Bow Lake land that is available.
84. Please study the options of having Renton where open just on the weekends to mitigate impacts at Bow Lake?
85. How would Algona wait times change if Renton was left open? How would Algona wait times change if Peirce County users were restricted or discouraged from using Algona? What if hours of operation were extended in Algona? Please answer these questions in the report.
86. Specify the details of not meeting the drive time standard in the report. For what % of the service area is this the case for? Are current rural drop boxes included in reaching this conclusion?
87. How would the proximity of Seattle's, Snohomish County and Pierce County's transfer stations help mitigate impacts or change results under all alternatives?
88. Please report on the cost to add compaction at the same time as remodel is done at any transfer facility. The compaction maneuvering area can be done in less than 200 lineal feet. Most trucking facilities do not operate with 200 lineal feet of maneuverability but closer to 100 lineal feet.
89. In Algona, yard waste can be accepted by the current landscape supply company that King County leases to. By having yard waste accepted on the adjacent property, the Algona transfer station could keep commercial service open or provide two lanes of self-haul service.
90. Please study the option of the Algona transfer station having both commercial and self-haul service remain open.
91. Please study the option of two lanes of self-haul being provided at the Algona Transfer Station.
92. Please study how the adjacent King County owned land in Algona can be used to help minimize traffic impacts to local streets.

Draft Transfer Station Report - Comments

November 1, 2013

93. Please study how the adjacent Algona land can be used to provide recycling and yard waste services.
94. Since the 2006 Transfer Station Study, King County purchased land in Algona adjacent to the current Algona Transfer Station. This adjacent land was purchased in 2012. Why is King County Solid Waste not studying the option of using this adjacent land. It appears irresponsible not to include this land in the studies.
95. Why are there no policy changes, incentive ideas, rate adjustments, incorporation of 3rd party recommendations or new ideas presented in King County Solid Waste's report? Numerous excellent ideas could be incorporated into this report which would change future transfer station requirements
96. The long term issue of Cedar Hills Landfill capacity constraints, potential impacts of policy changes and zero waste initiative goals have largely been skimmed over and not appropriately studied in this report.
97. Collaboration with stakeholders was limited because of time constraints and King County Solid Waste's control of information, the process and alternatives.
98. If operating hours are extended, this will help reduce vehicle capacity failure from happening at least 10% of the time. Please explore extending operating hours in this report.
99. Please study the option of street improvements to West Valley Highway in Algona. Designated turn lanes could be added to West Valley Highway. Please study how access to Algona can be changed whereby vehicles enter the Algona Transfer Station as far north as Iowa Drive. Vehicles can be given a large area to queue that is off the surrounding streets.
100. Please study moving the current transfer trailer storage in Algona to the adjacent property already owned by King County. This will help create additional queuing area and thereby reducing impacts to area streets.
101. All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirements.
102. Please provide collection cost data impacts for each city in King County.
103. A financial incentive is good for haulers to avoid using the King County Transfer Stations because it reduces the need to have new and/or larger transfer stations. Please study what would change in the alternatives if a lower regional direct rates was reintroduced.
104. How would a change in the regional direct rate impact transfer station capacity in South King County? This concern was also brought up in the review of the Plan. Please provide equity to South King County in your review of this possibility.
105. The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was effective. Direct haul can extend the life of existing

Draft Transfer Station Report - Comments

November 1, 2013

transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.

106. Please study the costs and benefits of direct haul to Cedar Hills and/or another transfer station during the period of construction of a transfer station verses keeping the transfer station open during construction.
107. Please study the costs and benefits of using Cedar Hills for limited peak periods and in the event of emergencies or service disruptions to a transfer station.
108. This study arrives at an improper conclusion for multiple reasons including the fact that Algona has adjacent land already owned by King County that needs to be incorporated into the study. Further, the existing Renton Transfer Station could remain open to help adequately serve South King County. One or more changes in the alternatives could result in a different conclusion. A 3rd party audit of the report should be done to reveal any other considerations, alternatives or changes that should be made to this report.
109. The report should mention that the South King County cities of Algona and Auburn have the same permitting risks and concerns as Bellevue. Please provide equity in this report by mentioning the same risks and concerns. Algona and Auburn are the identified cities in the EIS for the 3 South King County sites.
110. Why are the specific justifications for phasing different in the South King County from the North King County? South King County already has Bow Lake, Renton, Algona, Enumclaw, Cedar Falls Dropbox and Cedar Hills Landfill how is phasing and waiting to build in North King County so very different than waiting to build in South King County?
111. What specific amount of South King County population growth will be within a 30 minute drive time of the current Enumclaw Transfer Station?
112. The existing Shoreline Transfer Station has adjacent homes and parks. Why is the Houghton Transfer Station being given preferential treatment because of residences?
113. The existing Renton Transfer Station has recycling and also the ability to expand on adjacent vacant land. Why are we not considering alternatives that keep Renton open?
114. King County Solid Waste has options available to meet demand for years to come while at the same time limiting capital expenditures. Waiting to build new transfer stations will allow future transfer stations the ability to be different if need be to meet future changes in waste handling, recycling and technology. Shoreline, Bow Lake and possibly Factoria are newer stations and we can wait to build the next generation of transfer stations in the Northeast and South County and in doing so the next generation of transfer stations will likely be superior.
115. Why has Solid Waste not presented other variations to alternatives and only one variation to the Base Alternative? Rate payers and stakeholders want to be presented with other options that meet or come closer to meeting forecasts.

Draft Transfer Station Report - Comments

November 1, 2013

116. King County should explore other solutions and alternatives exist whereby the Algona Transfer Station is not replaced and South King County would still have equivalent services as other parts of the County.
117. King County Solid Waste should be reasonable, not overbuild, listen to the communities and be innovative. Solid Waste is jamming new transfer stations down the public's throat at their expense. If a transfer station is overbuilt it is a waste to rate payers. Solid waste transfer and waste management is an important issue, but if not done correctly mistakes are very costly. A careful and timely consideration of these alternatives by decision makers will be needed as part of the transfer system plan.
118. Revisit level of service criteria and recommend other changes that will meet King County's needs while providing future flexibility. For example, one such change could be that Bow Lake provides emergency storage for Algona.
119. Be sure retention and repair costs and the overall report takes into account adjacent land that King Count already owns at Factoria, Algona, Houghton and other locations.
120. When Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense. Parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. Capacity has been created a Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted.
121. What is the hurry by KCSW? Do the report correctly.

From: SWD, WebSite
Sent: Friday, November 01, 2013 1:18 PM
To: Jan Brekke
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Jan Brekke
ADDRESS: Redmond, WA 98052
EMAIL: brekkejan@hotmail.com
COMMENTTYPE: Suggestion
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: Transfer Station Report Comments November 1, 2013

? The overall pursuit of alternatives even be it incremental improvements or changes is missing, thereby not arriving at the best solution for ratepayers. Solid Waste is overlooking the intent of Ordinance 17619.

? Given the lack of innovation and Solid Waste's desire to continue with a minor variation of the Base Plan (possibly phase North King County), a third party independent review is necessary. An independent review happened in the original 2006 Plan and therefore it is important to do so now, if not more important given King County Solid Waste's position. Had King County Solid Waste demonstrated they are thinking outside the box in the Review and thorough in its reporting it may not be necessary, but because King County Solid Waste has not done so it is necessary to consult with an unbiased, independent 3rd party.

? The report should detail out the specifics of failure for each criteria for each location and include the degree of failure and date of any future failures. King County Solid Waste should study how each failure can be improved upon or overcome. Incremental improvements will extend the life of transfer stations and provide future flexibility in the system. There are advantages to waiting before spending millions on a new transfer station.

? KCSW should make at least some suggestions or modifications on how the private sector could positively impact the transfer stations and reduce the need to build new stations. Stakeholders are looking for solutions in as many areas as possible and the private sector can help. The private sector has the ability to reduce the demand on transfer stations.

? Since the approval of the 2006 plan, King County has acquired additional adjacent land which can be used to make level of service improvements. Please evaluate how this additional land can be used to make improvements other than replacement of the existing Algona facility.

? We have an existing transfer system that has some strategically located new stations that can work together with the older stations. Together we can extend the life and use of what is currently in place without building new stations.

? Rather, upon review, King County Solid Waste is continuing to push through on its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan but in part to determine if changes could be made that could reduce future expenditures.

? We need processing technologies to increase diversion exist to address the commercially collected and self-hauled material streams delivered to the County's facilities. There are a limited number of commercially viable technologies for treating commercially collected residual waste: Advanced Thermal Recycling/Waste-to-Energy ? a process of generating energy in the form of electricity and/or heat from the incineration of waste. Mechanical Processing to Create Refuse Derived Fuel ? a fuel produced by shredding and dehydrating waste into fuel pellets. The pellets are then burned in a waste-to-energy facility or another industrial facility such as a cement kiln. Mechanical Biological Treatment - a type of waste processing facility that combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion. King County should study these options in this report and more fully before proceeding with new transfer stations.

? The report should provide an overall openness to consider other alternatives. The references to failure are not appropriate when alternatives exist to extend the life of our existing transfer stations.

? King County should align policies, fees, and regulations to emphasize, incentivize, and compel reuse and recycling of waste toward Zero Waste of Resources.

? County facilities are to take a more active role in diverting reusable products and materials from its waste stream, King County Code regarding salvaging and scavenging should be altered to reflect that priority.

? Show how Solid Waste is incorporating the 139 potential new strategies that were recommended in the July 2013 Optimized Transfer Station Recycling Feasibility Study into future and current transfer stations. Implementing the 139 recommendations and new recycling strategies in the July 2013 HERRERA Optimized Transfer Station Recycling Study will drastically change transfer station usage, demand and physical requirements.

? Most of the recycling is currently done outside the main transfer building. Recycling can be implemented at existing sites that do not have it. Please start implementing existing recommendations that do not require a decision on a new transfer station and will require a lower level of capital cost.

? King County SW needs to study the option of co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities.

? As King County proceeds to modernize its transfer system with the siting, design, and construction of new facilities, and the updating or moth-balling of others, stark choices exist:

? What is an appropriate level of recycling to accomplish at existing and new facilities?

? Should the County do material processing itself to accomplish its Zero Waste goals? At what level?

? What type of partnership should the County have with the private sector?

? What is the best mix of facilities (and where should they be) to maximize diversion efficiently?

? There were numerous functional and service alternatives were not fully explored. These include further options of continuing use of existing transfer stations for various types of users, changes in operating hours, development of new class of small business haulers, addition of services on adjacent land, and use of private service providers.

? We should eliminate the acceptance of most standard curbside recyclables at transfer facilities, as it is more efficient and cost effective to collect them at the curb. The space and resources at the stations could be used instead for collection of other materials that are not easily collected curbside.

? It is estimated that its transfer stations and landfill received about 90,000 mattresses weighing more than 3000 tons for disposal in 2011. A policy should be developed to ban the disposal and recycle of these 90,000 mattresses.

? Please explore options such as 75% of system users within 35 minutes travel time. Options like this were not explored in the report.

- ? Revisit level of service criteria and recommend other changes that will meet King County's needs while providing future flexibility. For example, one such change could be that Bow Lake provides emergency storage for Algona.
- ? Be sure retention and repair costs and the overall report takes into account adjacent land that King County already owns at Factoria, Algona, Houghton and other locations.
- ? Study debt service obligations are now increased and near-term ratepayers are going to pay more for the system and infrastructure than they need to past 2028 because of changes with number of cities participating in the ILA. Please have the King County Performance Audit updated.
- ? Feedback was received KCSW but feedback was rebutted by King County Solid Waste and not incorporated to make a better transfer plan moving forward. Very little time was given for the study transfer station options and additionally very little time was given for feedback on the Draft report.
- ? When Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense. Parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. Capacity has been created a Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted.
- ? What is the hurry by KCSW? Do the report correctly.
- ? We need to study the option of using storage capacity at newer transfer stations such as Bow Lake in an emergency and limiting emergency service at older facilities such as Renton or Algona. The report should study the option of trailer storage of refuse on the adjacent land that King County owns in Algona and other facilities.
- ? The use of privately owner transfer stations and recycling centers and how they might substitute or supplement King County owned facilities should be studied.
- ? The KC RPC was very concerned about the lack of time to process and comment on the draft report. Please recommend more time for the involvement of stakeholders.
- ? Upon issue of the this report, public perception is such that Solid Waste is pushing its agenda through at any expense.
- ? Extending the life, remodeling and enhancement of the existing transfer stations will maximize rate payer value and provide rates as low as reasonably possible. This is achievable especially will some compromise on level of service objectives.
- ? The recommended changes found in audits and 3rd party reports from GBB report in 2007 and HERRERA report in 2013 have not been incorporated into the Transfer System Plan and this report.
- ? Processing recycling at Bow Lake and Shoreline is possible but would require extensive operational changes. Solid Waste should implement and understand tipping floor sorting and recycling before building new \$80 million transfer stations that might warrant changes.
- ? Emergency storage for disasters can be achieved using extra capacity on the inside of newer transfer stations. In the event of a disaster, waste can also be directed from older transfer stations to newer transfer stations or to transfer

stations outside the disaster area. Disaster refuse can also be stored in trailers at existing transfer stations and on adjacent land already owned by King County at locations such as Algona. Temporary direct haul Cedar Hills Landfill can be used in the event of a disaster. King County can also pursue disaster agreements with Seattle Solid Waste, Tacoma Refuse and other municipalities. Please incorporate these options into the study.

? A reduction in staff and lost jobs at King County Solid Waste would be a potential result in not building new transfer stations. KCSW staff could be biased in the preparation and presentation of information. A third party report will help insure the overall task and information is being processed in the most unbiased manner.

? The Bow Lake Transfer Station has extra land available. Please note this in the report and how this land can be used to mitigate changes and increased demand in the future.

? The report should study the options and impacts of more participation with private service providers as noted in Milestone Reports. Many dates, costs and factors have changed since these reports have been issued.

? Policy and program initiatives resonated as the top opportunities from outside research that have real potential for King County, and address the primary constraints identified: Maximize the use of disposal bans where markets are in place in order to divert materials and products to the appropriate private reuse and recycling infrastructure. Refine the use of recycling fees to emphasize curbside collection of traditional recyclables and to create more opportunity for other targeted materials. Enhance program initiatives in product stewardship and use public collection and processing infrastructure to leverage existing or developing private collection and processing infrastructure. Refine waste acceptance and handling policies that restrict more active involvement by County staff in facilitating diversion of materials to reuse and recycling.

? A new Interlocal Agreement was just adopted and new language, provisions, policies and requirements are contained in the newly signed agreement. Please review these changes and how they impact the overall Solid Waste Plan and the Transfer System Plan.

? More alternatives and or combinations of alternatives need to be studied in this report. Additionally options on how they get purposed whether it be for self-haul, commercial haul, yard waste or recycling.

? Costs need to be presented in a systematic manner with incremental costs presented for each station being remodeled in addition to the proposed rebuild. Costs figures need to be presented in a more incremental way. Solid Waste has lumped alternatives together which could be appropriate but in doing so confuses the reader and also presents the information in a complicated manner

? King County SW is scheduled to conduct a rate study in 2014. The rate study and results should be incorporated into this report. A rate study has not been done for a number of years.

? King County Solid Waste disposal rates are significantly lower than the tipping fees in adjacent jurisdictions. How will changes in rates affect future system demand and reduce the need to build new transfer stations?

? Development of a framework for financial policies and host city mitigation, including compensation agreements needs to be studied in this report.

? Shoreline and Bow Lake capital costs should be paid off before 2028 because of the withdrawal of Bellevue and other cities from the interlocal agreement.

? The City of Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 ? 2028. This affects the Houghton Transfer Station and Bellevue. This is a short term problem and therefore a short term solution is warranted. By continuing with the long term plan and if cities do not renew the Inter Local Agreement then

there are fewer people to share the capital costs. Changes to the ILA's and the cities participating in the system will impact the development and configuration of the system, future capital investments, services and rates.

? Please study the benefits of restricting use or changing the rates for users from Pierce County using the Algona Transfer Station.

? Please study the benefits of restricting use or changing the rates for users from the City of Seattle using Bow Lake, Renton and Shoreline Transfer Stations.

? Please study the benefits of restricting use or changing the rates for users from the City of Bellevue after the year 2028 using Factoria and Houghton Transfer Stations.

? The extension of operating hours is a very cost effective use of facilities. Please study extending hours of operation at each station as a means to mitigate wait times and provide further options for both commercial and self-haul.

? Please mention currently used private transfer stations in use for yard waste, recycling, construction debris and refuse. More private transfer stations can be reintroduced.

? Study the alternative whereby no transfer stations are closed and transfer stations are remodeled with commercial service remaining at all locations. This alternative will likely result in the lowest collection costs and therefore an important alternative to consider in this report.

? Traffic studies should be performed verses using web based drive times.

? Specific frequency and length of wait times should be studied.

? An overall rate study on collection costs and other costs should be performed.

? Cities negotiate contracts with their haulers and should be given time to discuss options and costs with their current haulers and other potential haulers.

? Please include the impact of the possible future changes Cedar Hills Landfill rent payments to users for the use of Cedar Hills Landfill.

? Include possible future costs to haul waste outside King County when Cedar Hills Landfill is projected to reach capacity in 2028 which is before the end of this study and the ILA in 2040.

? Please further study all original 17 level of service criteria and recommend even small changes that will help improve the transfer system or specifically reduce the need to new transfer stations.

? Specify details of frequency of failure and possible solutions to minimize failure. Please note the option of current and future additional rural drop boxes to help provide options and mitigate drive times.

? The transfer station scoring system is too negative in its rating scale. A wait time slightly exceeding 10% would equate to failure and this over dramatizes the wait time issue. Please be transparent in the presentation of information and don't project a bias.

? King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility in addressing issues. Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking

the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

? Completely explore options, incentives, restrictions, policies and changes with self-hauling. A combination of changes to self-hauling with extend the life and potentially reduce demand on the transfer station system. Increasing tipping and self-haul rates to meet or exceed neighboring municipalities such as Seattle, Tacoma and Pierce County will reduce demand on our transfer system. Please specifically study the elasticity and changes to rates and tipping fees.

? Please report on the increased use and of alternative fuels such as compressed natural gas by commercial haulers.) The report should mention that new trucks are also more fuel efficient.

? Please study the impact of potential increased use of onsite waste compactors by commercial property owners and apartments thereby dramatically reducing traffic and GHG emissions.

? Study whether King County should co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities?

? Should King County construct a regional resource recovery park for multiple recyclable and compostable materials at a new site and how will this affect the overall transfer station system?

? Should King County site, design and build new King County solid waste facilities to align collection and processing in advanced materials management system and how would this affect transfer stations?

? Please look at not closing Renton, Houghton and Algona transfer stations and further evaluate alternatives around these.

? Renton is closed in all alternatives and this affects South King County where a new transfer station is being considered. It makes no sense to close the Renton transfer station thereby causing system constraints that lead to building a new location. Evaluate keeping Renton open in all alternatives.

? King County code (KCC 10.12.021.G) allows fees for recycling to be set lower than those for disposal to encourage recycling over disposal. The use of differential fees is an important tool for increasing reuse and recycling. Please study the impacts of changes in fees and future needs of transfer stations.

? Numerous cities in King County do not require curbside recycling and please study the impacts of this in the report.

? The mission of King County's waste reduction and recycling programs is to divert as much material as possible from disposal in a manner which reduces the overall costs of solid waste management to county residents and businesses, conserves resources, protects the environment and strengthens the county's economy. The draft 2013 Comprehensive Solid Waste Management Plan should be updated and incorporate the July 2013 HERRERA Optimized Transfer Station Recycling Study before issuing the 2013 Comprehensive Solid Waste Management Plan in its final form.

? The 2013 HERRERA Optimized Transfer Station Recycling Study presented 139 recycling strategies and these were allocated among station generations as follows: ? Sixty-four (64) strategies were applicable to all stations ? Seven (7) strategies were applicable to older stations only ? Forty-one (41) strategies were applicable to updated/retrofitted stations AND new stations ? Fifteen (15) strategies were applicable to new stations only. These 139 strategies need to be fully considered before building or closing any transfer stations.

? SWAC and MSWMAC and KCSW should review the July 2013 HERRERA Optimized Transfer Station Recycling Study and consider revising the Recycling Scenario 3 before this Draft Transfer Station Plan Review is adopted. What if

we adopt another and more rigorous Recycling Scenario is liked and how would this change transfer system demand and requirements?

? The report should attach the HERRERA Optimized Transfer Station Recycling Feasibility Study done in July 2013 to this report in both the Appendices and also in the body of the report under recycling and other sections.

? Disposal bans at transfer facilities for priority materials such as clean wood, scrap metal, yard (and land clearing) waste, mattresses, and cardboard are not being used to the maximum extent possible to advance Zero Waste of Resources goals.

? Overall recycling and zero-waste initiative goals are lacking in this report and have a very significant influence on how we use the King County Transfer System.

? A fee on traditional material recycling at transfer stations should compel customers to place them into the curbside collection system, if it is available, rather than travel to transfer facilities. This reduces vehicle travel overall, and produces fewer emissions.

? Please spell out specifics on when limitations are put on recycling because of system constraints. Such as in what year and how often recycling and other service capacities are overloaded?

? Drive time maps have multiple overlaps whereby 90% of users can still choose other transfer stations or regional drop boxes to access. Please make sure this is option is clear to the readers of this report.

? Please apply the 17 criteria in the report to each transfer station facility and do not lump into alternative groups.

? The report should suggest ways to meet criteria at each location and also as a group. Ideas include keeping Renton open, creating new alternatives, additional remodel, and use of adjacent land.

? The report should evaluate the use of the additional land that King County purchased in Algona. This can be used as expansion space for Algona while keeping or remodeling the current structure. It is a major oversight not to consider how this additional land can be used to meet current needs, add services or come closer to meeting criteria.

? There exists an opportunity for thinking differently about the flow of material, such as partnering with Cities for alternative spaces and drop box sites using City real estate. Please study this opportunity in the report.

? The cities of Auburn and Algona have also expressed concern about the 3 replacement sites being evaluated for South King County. The City of Bellevue and the City of Kirkland are the only one's mentioned that have concerns about siting.

? The Houghton station has adjacent land that can be used to add some recycling and/or other services or improvements.

? What would it cost to add compaction in Houghton and other potentially remodeled transfer stations? Please include this in the report.

? Shoreline is in a residential area and has increased hours of operation why is Shoreline different than Houghton? Please provide equity in evaluating transfer stations.

? Please evaluate extending hours of operation at transfer stations for all alternatives studied and how this specifically would impact wait times.

? At what specific times and year would Bow Lake need to be limited to self-haul and recycling?

- ? Bow Lake has some additional land that can be used to help provide capacity. Please study the additional Bow Lake land that is available.
- ? Please study the options of having Renton where open just on the weekends to mitigate impacts at Bow Lake?
- ? How would Algona wait times change if Renton was left open? How would Algona wait times change if Peirce County users were restricted or discouraged from using Algona? What if hours of operation were extended in Algona? Please answer these questions in the report.
- ? Specify the details of not meeting the drive time standard in the report. For what % of the service area is this the case for? Are current rural drop boxes included in reaching this conclusion?
- ? How would the proximity of Seattle's, Snohomish County and Pierce County's transfer stations help mitigate impacts or change results under all alternatives?
- ? Please report on the cost to add compaction at the same time as remodel is done at any transfer facility. The compaction maneuvering area can be done in less than 200 lineal feet. Most trucking facilities do not operate with 200 lineal feet of maneuverability but closer to 100 lineal feet.
- ? In Algona, yard waste can be accepted by the current landscape supply company that King County leases to. By having yard waste accepted on the adjacent property, the Algona transfer station could keep commercial service open or provide two lanes of self-haul service.
- ? Please study the option of the Algona transfer station having both commercial and self-haul service remain open.
- ? Please study the option of two lanes of self-haul being provided at the Algona Transfer Station.
- ? Please study how the adjacent King County owned land in Algona can be used to help minimize traffic impacts to local streets.
- ? Please study how the adjacent Algona land can be used to provide recycling and yard waste services.
- ? Since the 2006 Transfer Station Study, King County purchased land in Algona adjacent to the current Algona Transfer Station. This adjacent land was purchased in 2012. Why is King County Solid Waste not studying the option of using this adjacent land. It appears irresponsible not to include this land in the studies.
- ? Why are there no policy changes, incentive ideas, rate adjustments, incorporation of 3rd party recommendations or new ideas presented in King County Solid Waste's report? Numerous excellent ideas could be incorporated into this report which would change future transfer station requirements
- ? The long term issue of Cedar Hills Landfill capacity constraints, potential impacts of policy changes and zero waste initiative goals have largely been skimmed over and not appropriately studied in this report.
- ? Collaboration with stakeholders was limited because of time constraints and King County Solid Waste's control of information, the process and alternatives.
- ? If operating hours are extended, this will help reduce vehicle capacity failure from happening at least 10% of the time. Please explore extending operating hours in this report.
- ? Please study the option of street improvements to West Valley Highway in Algona. Designated turn lanes could be added to West Valley Highway.

- ? Please study how access to Algona can be changed whereby vehicles enter the Algona Transfer Station as far north as Iowa Drive. Vehicles can be given a large area to queue that is off the surrounding streets.
- ? Please study moving the current transfer trailer storage in Algona to the adjacent property already owned by King County. This will help create additional queuing area and thereby reducing impacts to area streets.
- ? All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirements.
- ? Please provide collection cost data impacts for each city in King County.
- ? A financial incentive is good for haulers to avoid using the King County Transfer Stations because it reduces the need to have new and/or larger transfer stations. Please study what would change in the alternatives if a lower regional direct rates was reintroduced.
- ? How would a change in the regional direct rate impact transfer station capacity in South King County? This concern was also brought up in the review of the Plan. Please provide equity to South King County in your review of this possibility.
- ? The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was effective. Direct haul can extend the life of existing transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.
- ? Please study the costs and benefits of direct haul to Cedar Hills and/or another transfer station during the period of construction of a transfer station verses keeping the transfer station open during construction.
- ? Please study the costs and benefits of using Cedar Hills for limited peak periods and in the event of emergencies or service disruptions to a transfer station.
- ? This study arrives at an improper conclusion for multiple reasons including the fact that Algona has adjacent land already owned by King County that needs to be incorporated into the study. Further, the existing Renton Transfer Station could remain open to help adequately serve South King County. One or more changes in the alternatives could result in a different conclusion. A 3rd party audit of the report should be done to reveal any other considerations, alternatives or changes that should be made to this report.
- ? The report should mention that the South King County cities of Algona and Auburn have the same permitting risks and concerns as Bellevue. Please provide equity in this report by mentioning the same risks and concerns. Algona and Auburn are the identified cities in the EIS for the 3 South King County sites.
- ? Why are the specific justifications for phasing different in the South King County from the North King County? South King County already has Bow Lake, Renton, Algona, Enumclaw, Cedar Falls Dropbox and Cedar Hills Landfill how is phasing and waiting to build in North King County so very different than waiting to build in South King County?
- ? What specific amount of South King County population growth will be within a 30 minute drive time of the current Enumclaw Transfer Station?
- ? The existing Shoreline Transfer Station has adjacent homes and parks. Why is the Houghton Transfer Station being given preferential treatment because of residences?

? The existing Renton Transfer Station has recycling and also the ability to expand on adjacent vacant land. Why are we not considering alternatives that keep Renton open?

? King County Solid Waste has options available to meet demand for years to come while at the same time limiting capital expenditures. Waiting to build new transfer stations will allow future transfer stations the ability to be different if need be to meet future changes in waste handling, recycling and technology. Shoreline, Bow Lake and possibly Factoria are newer stations and we can wait to build the next generation of transfer stations in the Northeast and South County and in doing so the next generation of transfer stations will likely be superior.

? Why has Solid Waste not presented other variations to alternatives and only one variation to the Base Alternative? Rate payers and stakeholders want to be presented with other options that meet or come closer to meeting forecasts.

? King County should explore other solutions and alternatives exist whereby the Algona Transfer Station is not replaced and South King County would still have equivalent services as other parts of the County.

? King County Solid Waste should be reasonable, not overbuild, listen to the communities and be innovative. Solid Waste is jamming new transfer stations down the public's throat at their expense. If a transfer station is overbuilt it is a waste to rate payers. Solid waste transfer and waste management is an important issue, but if not done correctly mistakes are very costly. A careful and timely consideration of these alternatives by decision makers will be needed as part of the transfer system plan.

IMG_VERIFY: BUZ

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 11/1/2013 1:17:58 PM

BREKKE JAN

**BREKKE JOHN
(BREKKE PROPERTIES)**

**JOHN BREKKE
BREKKE PROPERTIES
10423 MAIN STREET
BELLEVUE, WA 98004
(425) 451-1511**

October 22, 2013

Diane Yates, Intergovernmental and Legislative Liaison
King County Solid Waste Division, Director's Office
201 So. Jackson St., Ste. 701
Seattle, WA 98104

RE: October 9, 2013 Draft Transfer Plan Review Comments

Dear Ms. Yates:

Per Ordinance 2013-0258 Section B, I hereby request that the following feedback be documented in the final version of the Transfer Plan Review report. Additionally, I hereby request the following feedback be incorporated into the Transfer Plan Review report.

Impact to rates need to be studied further in the report

1. On Report Page 8: "As one hauler noted, 'A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates.'"
2. The information from haulers is arguable and incomplete. The estimates, data, and opinions are limited therefore requiring risky interpretation and misleading information.
3. Cities in King County need to have time to directly communicate, negotiate and receive cost estimates from their haulers and competing hauling firms.
4. Each individual city commercial hauler contract terms, costs and contract duration data needs to be added to the report.
5. The report results on hauling rates are fouled because of the mixing of North King County and South King County hauler rate estimates.
6. The King County ILA has not been signed and finalized by King County. This impacts the ability to be accurate on rates and therefore rate projections cannot be relied on.
7. A 3rd party, independent study needs to be performed on hauling rates. Use GBB Solid Waste Consultants, HERRERA Environmental Consultants or other consultants.

8. Solid waste hauling to areas other than Cedar Hills Landfill needs to be part of study and how it impacts rates because Cedar Hills Landfill is projected to reach capacity before the year 2040.
9. Fuel costs and greenhouse gas emissions with haulers will go down with use of alternative fuels (compressed natural gas) and increased truck efficiency. This is an increased trend and needs to be mentioned in report.
10. The report needs to accurately describe the source of anticipated housing, density and population growth.
11. Rate changes will have an effect on customer frequency and volumes to Transfer Stations. Rate elasticity and impacts should be incorporated into report.
12. Commercial haulers get to choose and King County does not control their use of multiple Transfer Stations which needs to be further studied and disclosed in the report.
13. Cities in King County or King County itself could make haulers use specific transfer stations which needs to be studied.
14. Commercial haulers can change use patterns based on traffic, drive times, base locations and costs which needs to be studied in the report or by a 3rd party traffic consultant.
15. Commercial hauler bases and also private transfer stations should be shown in maps on the report.
16. The report lacks acknowledgement of private yard waste and recycling service providers which play a vital role. Providers should be mapped and referenced. They play a vital role in the Transfer System and the recycling lifecycle.
17. Small business users of the Transfer System should be treated as a separate class in the system with differentiated rates, hours and ability to access stations.
18. Alternatives, costs and policies limiting self-hauling need to be studied in the report.
19. Self-haul tipping fees are about 50% higher in the City of Seattle and in Pierce County. King County should raise rates to match or exceed neighboring jurisdictions. By not raising tipping fees, King County is directing extra burden on the Transfer System. The report should study the impact of less transfer station use due to raising tipping and other fees.
20. This report should remain in draft form until the proposed/pending 2014 King County Solid Waste rate study is performed, critiqued and incorporated accordingly.

The expansion options of the Algona Transfer Station should be evaluated

1. King County needs to disclose it already owns adjacent Algona land parcels in report. This land was purchased to preserve expansion options for Algona in June 2012.
2. The report is misleading because report references no ability to expand on the Algona land that King County already owns.
3. Adjacent King County land can be expanded onto and used to add recycling, yard waste, queuing, trailer storage and other level of service improvements in Algona.
4. Report needs to address Algona expansion possibilities with or without a remodel being done.

5. In 2001 recycling services were proposed and planned for Algona. Adding recycling in Algona is possible, especially now that King County owns adjacent land.
6. In 2006 waste compaction was explored in Algona. Waste compaction is possible to add in the Algona remodel option. Please update Algona remodel costs to include compaction.
7. The 200 lineal feet for waste compaction truck access is an over estimate and exceeds typical warehouse truck maneuvering areas. Waste compaction can be added in Algona in less than 200 lineal feet.
8. Two Algona self-haul lanes should be studied verses just one self-haul and one yard waste lane. This is an important option that needs to be studied in the report. Having two self-haul lanes in Algona and will reduce self-haul impacts at nearby transfer stations including Bow Lake, Enumclaw and Renton.
9. The report needs to also look at leaving one self-haul and one commercial lane in Algona. This option continues the current use and needs to be fleshed out by pairing with other alternatives studied in the report.
10. Cedar Recycling which is in close proximity to Algona needs to be mentioned in report. Cedar Recycling is currently receiving metals, plastics and cardboard. Cedar Recycling has plans to rebuild and expand.
11. Algona Transfer Station yard waste service can be provided on adjacent King County land by current tenant Interwest Landscape Products or similar tenant like Pacific Topsoils. Landscape product suppliers typically receive yard waste from their customers. King County owns the adjacent land, is leasing it, and can require tenant to receive yard waste.
12. On Page 1 of report: "these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor." This statement is wrong and misleading. Algona has adjacent additional land that can be utilized.
13. The reference to a Redefined Criterion 8, this reference is confusing. Algona has the ability to expand. (Page 8 of report)

Separate South King County and North King County studies should be done

1. A Factoria transfer station decision should happen first and then separate studies for North and South King County should be done.
2. Report data and results become skewed when too much is tied together between various areas in King County.
3. South King County should be granted the same wait and see recommendation as North King County. Unfair treatment is being applied to South King County.
4. Renton transfer station should not be closed and should be studied as remaining open in the report and in all alternatives studied. Multiple use options between commercial haul and self-haul should be studied in the report for Renton transfer station.

5. How can transfer stations in Renton and Enumclaw be better utilized and part of the plan for commercial, self-haul, recycling and yard waste? Make these transfer stations part of the plan and specific to solutions and studies in South King County.
6. Current rural drop boxes should be noted on all report maps. Report information and drive times are misleading without rural drop boxes included.
7. Paired incongruent alternatives, less likely scenarios and limited alternatives are given and studied as the alternatives in the report. Other alternatives need to be evaluated and expanded on.
8. Update information and maps to include South Seattle Transfer Station and Pierce County Transfer Stations. Customers do and will take advantage of shorter drive-times and locations of nearby transfer stations outside the ones managed by KCSW.
9. Significant portions of City of Auburn are in Pierce County. Additionally, 10% of Algona transfer station use is from Pierce County. Please disclose this material fact in the report. Please also study the impacts on transfer system capacity when various limitations and disincentives are used with Pierce County residents and cities.

Further Equity and Social Justice concerns should be included in report

1. Equality should be given in the wait-and-see approach to both South King County and North King County.
2. The siting a new transfer stations close to Bow Lake further creates South King County as dumping ground of the majority of King County's solid waste.
3. The number of transfer stations proposed falls disproportionately on the community of South King County.
4. Similar to the City of Bellevue with the Factoria Transfer Station, the cities of Algona and Auburn have land use, zoning and permitting issues with the siting of a new transfer station. This needs to be specifically mentioned in the report in order to present information fairly and accurately.
5. The City of Bellevue received greater influence, participation and involvement from King County. Equality must be granted to other impacted cities.
6. Any additional data or other changes made to this report between October 23, 2013 and November 27, 2013 need to be given further public comment.
7. Please remove the overall bias by KC Solid Waste to build new transfer stations. Other functionality and service alternatives were avoided by KC Solid Waste.
8. Please present the report with more solutions and available options that do not build new transfer stations. Study of the retention and repair of the transfer stations was a major component of Ordinance 2013-0258 which required this report to be done.
9. King County Solid Waste was the one who chose the limited public comment period of two weeks and retained 4 weeks for final report changes. 30 days is a typical public comment period and King County Solid Waste chose a shorter comment period for the public which is an unequal and unfair amount of time to comment.

10. Committees, stakeholders and the public were frustrated by the control of the data, selective presentation of options and documentation of accurate feedback by King County Solid Waste.
11. A projected bias is in this report and an independent third party needs to review this study. A third-party independent study will provide additional ideas, verification of data and equitable treatment to all interested parties.
12. Transparency of dates as it relates to level of service passing/failing grades needs to be made in the report. References are made to system failures without specific dates or locations of failures. A matrix or graph system needs to more clearly disclose and present information. Results and data are presented in a misleading way.

Advantages of waiting to build more transfer stations need to be incorporated into the report

1. Overall King County Solid Waste System flexibility is gained by waiting to build new transfer stations. New technologies and future trends can be incorporated into the system by waiting to build new transfer stations.
2. By waiting to build new transfer stations, capital costs will be smoothed out and impacts to rate payers will be lessened. Please model this approach in the report.
3. Ability to wait and phase a transfer plan is advantageous and provides a more accurate delivery of future needs.
4. Extending the life of currently functioning and existing facilities is realistic alternative with the best outcome for rate payers.
5. King County should wait and see the data and learning from Bow Lake and Factoria before building in South King County and North King County. This will result in a better Solid Waste System which then can be sized and outfitted to meet future needs.
6. History of incorrect estimates and planning is a risk factor. Waiting to build new transfer stations mitigates this risk.
7. New recycling (carpet, mattresses and other items) will influence Transfer Station System requirements. Waiting will allow future facilities to be adjusted to new recycling products and trends.
8. Waste to Energy, Biomass Processing and Zero Waste Initiatives play a part in solid waste plans, needs and impacts to transfer stations. These items need to be incorporated into the report.
9. Transfer Stations are an overall antiquated approach that we should be cautious to invest in.

Cedar Hills Landfill has future issues and options

1. Cedar Hills Landfill is near capacity and is projected close before 2040. It was first set to close in year 2012, then 2018 and now 2025. The pending Cedar Hills Landfill closing affects Transfer Station System and impacts need to be part of this report.

2. The Cedar Hills Landfill has the ability to add some direct haul. The specific direct haul capacity needs to be disclosed in the report. Direct haul can partially ease the burden on transfer stations.
3. The Cedar Hills Landfill can become a Transfer Station site now or at the projected closing date of 2025. This option needs to be studied.

Intermodal and out-of-county transport must be studied

1. South King County as the only potential to provide a transfer station with intermodal feature included. Determination of specific advantages and system costs of an intermodal transfer station are needed in report. It is short sided to not have an intermodal facility plan in place before siting a new South King County transfer station.

Environmental aspects and recycling are missing in the report

1. Report references to tipping floor sorting are made. No or very little tipping floor sorting is being done nor is there a specific use plan outlined by Solid Waste.
2. The report needs to address long term recycling trends and ability of ordinances, policies and rates to influence volumes.
3. "however, environmental analysis related to the recycling options for each alternative was beyond the scope of the review" Recycling and environmental trends are a focus and need to be in the forefront of the report.
4. Bow Lake recycling just opened in October 2013 and we need to understand how recycling affects Bow Lake, the Transfer System, and potential future changes to solid waste and recycling services.
5. References to potential increase in greenhouse gases will be countered by vehicle efficiency increases and alternative fuel use like compressed natural gas.
6. Waste conversion technologies will influence the Transfer Station System, need to be incorporated into the Transfer Plan Review, and be a part of projections out to 2040.
7. The potential for and contemplated use of Biomass processing at transfer stations needs to be incorporated into the report.
8. Numerous recommendations in HERRERA Optimized Transfer Station Recycling Feasibility Study just issued in July 2013 need to be further explored, developed and incorporated. These recommendations have drastic impacts to the Transfer Station System.

Policy decision options and impacts need to be incorporated in report

1. Mandatory recycling for new items should and will likely be a part of future polices. This will change transfer system needs, volume. results of the study. This needs to be mentioned in the report.
2. Bulk curbside pick-up can be done which will limit self-haul demands and therefore transfer station traffic volumes. This option needs to be studied in the report.

3. Planned and future Zero Waste Initiatives will change solid waste system requirements.
4. Customers using self-haul services that are not part of the KCSW system should be charged a surcharge to use the transfer system. Surcharges should be considered for Pierce County users and City of Bellevue users. For example, the City of Tacoma charges non-residents a premium to use their solid waste system.

Interlocal Agreement impacts need to be further expanded in report

1. Disproportional impacts are experienced and need to be corrected because of cities choosing not to participate in the ILA.
2. Existing capital costs and bonds should be paid off before Bellevue and other cities withdrawal from the solid waste system.
3. Several cities electing not to be part of the current ILA past 2028 should be given a firm deadline until the end of 2014 to lock in their decision. A revised Transfer System plan should not be adopted before this deadline is established.
4. A rate differential should be established for cities without extended interlocal agreements. This rate differential should be studied in the report.

Inaccuracies with the report include

1. On Page 10, "In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available". This is not appropriate to do before spending several \$100 million on a transfer station plan.
2. The solid waste tonnage forecasts go up and down in the report in multiple areas. Please reference the data to support this change. This data is different than past studies that were published by King County Solid Waste. See Page 11 in report.
3. The conclusions and recommendations on page 35 are not supported by the data.
4. References to low grades and systems failure is based on minor portions of data not meeting standards and is presented in a misleading manner. Report conclusions of long drive times are draw by taking from furthest areas and not addressing near by facilities such as King County Drop Boxes, City of Seattle facilities and Pierce County facilities which boarder King County and impact the King County Solid Waste System.
5. Report categorizes failure as a C with exceeding level of service over 10% of the operating hours. The determination and label as failure is misleading to the reader.
6. Report reference to Level C service equating to failure does not provide appropriate context. A wait 10% or more of the time should not be considered failure.
7. The level of service grading scale with wait times is bias toward presenting failure. System grading needs to be equally distributed over the range. The use of letter grades also needs to be changed to numbers or other indicators to present data in a fair and understandable manner.

8. Year, frequency and in what areas of King County exceeding Level C needs to be provided in the report. A systematic presentation of this data needs to be made in this report.
9. Travel times vary by time of day, traffic patterns and other factors. These important variables need to be shared in this report.
10. Use of the 2027 date is misleading and should be post July 2028 when Bellevue drops out of ILA.
11. Systematic and incremental analysis of impacts, capacities and functionality was lacking in the report and falls short of the intentions of the King County Ordinance 2013-0258.

Time constraint concerns should be documented in report

1. SWAC and MSWMAC Advisory Committees expressed concern about the limited time to property study, assimilate new information and comment on this report.
2. Multiple cities (City Managers, Mayors and City Staff) expressed concern about the limited time to property study, assimilate new information and comment on this report
3. Public expressed concern about the limited time to property study, assimilate new information and comment on this.
4. King County RPC expressed concern about the limited time to property study, assimilate new information and comment on this report.
5. The timing the release of this draft report release does not allow cities and groups time to present this report as an agenda item and take action given a commonly used set schedule of meeting times of various interested entities and groups.
6. There should be time provided for a 3rd Party independent study and review to be done before report is adopted. Last independent review was done in July 2007.
7. The 2013 Solid Waste Plan remains in draft form and needs to be finalized before revising the transfer station plan.
8. The public and interested parties received only a two week comment period which is very short and uncommon (usually 30 days).

Per Ordinance 2013-0258 Section B, I hereby request that my feedback be documented in the final report. Additionally, I hereby request my feedback be incorporated into this report. Please reach out to me if you need clarification on any of the above items mentioned in my comments.

Sincerely,

John W. Brekke
john@brekkeproperties.com

**BREKKE JOHN
(BREKKE PROPERTIES)**

From: John Brekke <john@brekkeproperties.com>
Sent: Friday, November 01, 2013 10:29 AM
To: Yates, Diane
Cc: Young, Polly
Subject: RE: Draft Transfer Plan Report Comment Period Extended - John Brekke Additional Comments
Attachments: Draft Transfer System Plan Review_Oct9 - Comments John Brekke.pdf
Importance: High

Diane,

Please accept the attached as additional comments from me for the Draft Transfer Report. The additional time provided was helpful.

Thank you,

JOHN W. BREKKE, CCIM
PACIFIC WEST REAL ESTATE, LLC
JOHN@BREKKEPROPERTIES.COM
PO Box 287
MEDINA, WA 98039
(425) 451-1511 OFFICE
(425) 451-9663 FAX
(206) 227-7990 CELL

From: Yates, Diane [<mailto:Diane.Yates@kingcounty.gov>]
Sent: Wednesday, October 23, 2013 8:24 AM
Subject: Draft Transfer Plan Report Comment Period Extended

Hello,

The purpose of this email is to let you know that the comment period for the Draft Transfer Plan Report has been extended to November 1, 2013. Comments received before November 2nd will be included in the responsive summary of the final report, which will be released on November 27th. We are happy to review any comments or questions received after November 1st, but it may not be possible to include them in the report.

Please let me know if you have any questions.

Sincerely,

Diane Yates

Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

Please note that my phone number has changed to: 206-477-5212

John Brekke additional comments submitted on 11/01/13.

Formatted: Font: 18 pt

Transfer Plan Review

Introduction

King County Ordinance 17619, adopted by the King County Council on July 8, 2013, directed the King County Solid Waste Division to conduct a review of the 2006 *Solid Waste Transfer and Waste Management Plan* (Transfer Plan). This Plan confirmed the current locations (the number and location of transfer stations could be reduced because of overlapping 30 minute drive times) of transfer stations was efficiently distributed throughout King County with adequate service hours (service hours can be extended to meet system needs now and in the future) to meet the needs of our customers; however, Algona, Bow Lake, Factoria, Houghton, and Renton, which were built in the mid-1960s, all failed (please detail which level of service items failed and provide solutions other than a total rebuild of a location) to meet level of service standards. All of them were operating over capacity (when did they go over capacity and what modifications and polices will extend the life), did not provide desired levels of recycling (but have the ability to add recycling on adjacent land or existing land), and failed to meet safety goals (please specify which safety goals and what improvements can be made). The adopted plan requires benefits from major transfer system upgrades in order to continue providing environmentally sound solid waste disposal services efficiently and effectively and at reasonable rates. The limitations of these functionally obsolete facilities have not improved with time despite a tonnage decline since the Transfer Plan was completed. (Please provide an overall openness to consider other alternatives. The references to failure are not appropriate when alternatives exist to extend the life of our existing transfer stations. Please be open to all options and alternatives)

The analysis in this review of the Transfer Plan has shown that alternatives that do not build one or more of the planned transfer facilities would result in lower capital costs for King County but increase overall costs for a significant number of residential and business customers because of the higher collection costs (collection costs need to be studied further). Building fewer transfer station would also reduce services and increase environmental impacts (but we could keep existing stations in place without closing or rebuilding). Future capital cost savings may be realized through phasing, value engineering and alternative project financing and delivery methods. King County should align policies, fees, and regulations to emphasize, incentivize, and compel reuse and recycling of waste toward Zero Waste of Resources.

The consequence of lowering capital costs by building fewer transfer station is a that it transfers costs to the commercial garbage haulers who will raise curbside collection rates correspondingly. (Cities need to study costs and negotiate directly with haulers). Additionally, in time, capital costs will be paid off while collection cost increases will be ongoing. Capital costs are uniformly distributed among all system users, while collection costs are dependent on transfer system configuration. The Northeast and South county regions are forecasted to experience the greatest population growth in the county. (please provide population forecasts). -Alternatives that do not provide transfer facilities in these regions will not only leave those areas underserved, but will raise collection costs in some of the system's lowest income areas and areas with the densest populations. if County facilities are to take a more active role in

diverting reusable products and materials from its waste stream, King County Code regarding salvaging and scavenging should be altered to reflect that priority.

Service levels are highest with a larger number of facilities. Alternatives with fewer stations leave many customers, often those in the most populous areas of the system, with reduced services. Those customers (including commercial haulers) will have to drive farther to reach a facility. Fewer transfer stations also reduces capacity for emergency storage at the remaining stations. Although every alternative can provide sufficient tonnage capacity, several do not meet transactional (vehicle) capacity. (In what year, at what frequency, day of week and time of day is transactional capacity an issue at each transfer station location) Alternatives that retain existing stations as self-haul only facilities can mitigate drive time issues for self-haulers, but present a number of other service concerns. These aging facilities can be renovated to continue operating, but cannot be expanded (false, expansion land is available at many of the locations) to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor. (Improvements can be made and please itemize level of service improvements that can be made at each location without a total rebuild)

Both the current adopted (2001) and draft 2013 Comprehensive Solid Waste Management Plans call for maximizing recycling (Please show how Solid Waste is incorporating the 139 potential new strategies that were recommended in the July 2013 Optimized Transfer Station Recycling Feasibility Study into future and current transfer stations.) In 2012, approximately 115,000 tons of recyclable materials were disposed by self-haulers and buried at Cedar Hills. The current self-haul recycling rate is only five percent, but must increase to 35 percent if we are to meet the 70 percent goal developed jointly by the division and its advisory committees. (Policy changes, user costs changes, incentives will help meet this goal and not just physical improvements) Currently, only Shoreline and Bow Lake are capable of supporting such growth in self-haul recycling. As a general rule, traffic impacts and resulting GHG emissions are minimized by increasing the number of facilities, by distributing facilities evenly throughout the service area, and by compacting waste before hauling to disposal (compactors reduce transfer trailer trips by about one third). With fewer facilities customers would drive further to reach facilities, increasing traffic and GHG emissions. (Implementing the 139 recommendations and new recycling strategies in the July 2013 HERRERA Optimized Transfer Station Recycling Study will drastically change transfer station usage, demand and physical requirements. Most of the recycling is currently done outside the main transfer building. Recycling can be implemented at existing sites that do not have it.) Please start implementing existing recommendations that do not require a decision on a new transfer station and will require a lower level of capital cost)

Every alternative presents some level of risk including siting, timing new construction, and failing to meet satisfactory levels of service to our customers. Each alternative presents a unique combination of risks that must be considered together with other factors. (By combining too many factors in each alternative, the conclusions get skewed and the results are flawed)

The analysis of the alternatives described in this report and preliminary stakeholder feedback indicate that the Transfer Plan (a scenario which was called the Base Alternative for this analysis) is still sound. However, the review shows the need to reconsider the timing and phasing in the implementation of the remaining new facilities. King County needs to study co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities.

King County seeks to provide sound solid waste disposal and recycling services in a way that is cost effective and equitable for everyone. This means making our services equally available to all of the residences and businesses within our system while ensuring that any potential negative impacts of

providing solid waste service do not fall disproportionately on a single community. Both of these approaches benefit from a regional system in which full-service recycling and transfer facilities are distributed throughout the system. (We have an existing transfer system that has some strategically located new stations that can work together with the older stations. Together we can extend the life and use of what is currently in place without building new stations.)

Purpose of review

King County Solid Waste failed to come up with new, creative and innovative ideas to challenge the 2006 Solid Waste Transfer and Waste Management Plan. Rather, upon review, King County Solid Waste is continuing to push through on its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan but in part to determine if changes could be made that could reduce future expenditures.

Formatted: Font: 11 pt

King County Ordinance 17619 called for a review of the Transfer Plan before continuing with implementation.

The purpose of this review is to:

1. Determine if changes are needed to ensure that the transfer system is sized/configured appropriately to meet current and anticipated needs and; (these needs will change as new policies are implemented and Cedar Hills Landfill reaches capacity in 2024)
2. Determine whether changes could be made that could reduce future expenditures while still meeting desired service objectives and levels. (The report needs to explore other options that have been recommended by stakeholders, consultants and auditors. Numerous achievable ideas can be implemented toward Zero Waste of Resources.

Processing technologies to increase diversion exist to address the commercially collected and self-hauled material streams delivered to the County's facilities. There are a limited number of commercially viable technologies for treating commercially collected residual waste: ☐ Advanced Thermal Recycling/Waste-to-Energy – a process of generating energy in the form of electricity and/or heat from the incineration of waste. ☐ Mechanical Processing to Create Refuse Derived Fuel – a fuel produced by shredding and dehydrating waste into fuel pellets. The pellets are then burned in a waste-to-energy facility or another industrial facility such as a cement kiln. ☐ Mechanical Biological Treatment - a type of waste processing facility that combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion. King County should study these options in this report and more fully before proceeding with new transfer stations.

This report summarizes the analysis and findings of the review in response to Ordinance 17619, Section 56, P1. As called for in Section A of the proviso, this report addresses:

1. Tonnage projections based on waste volumes from cities that have indicated commitment to the regional solid waste system through 2040 through approval of the Amended and Restated Solid Waste Interlocal Agreement; (please study and model changes in waste volumes when recycling and other policy changes are implemented)
2. Revenue projections based on waste volumes from cities that have indicated commitment to the regional solid waste system through 2040 through approval of the Amended and Restated Solid Waste Interlocal Agreement; (please study rate changes and financial incentives/disincentives and their effect on waste volumes. All capital costs should be paid off

before 2028 when Bellevue and other cities leave the ILA. Rates starting now should be different for cities not a part of the ILA after 2028.)

3. Overall costs of the region-wide transfer station upgrade; (more alternatives need to be considered)
4. Functionality and service alternatives at the respective transfer stations; (numerous functional and service alternatives were not fully explored. These include further options of continuing use of existing transfer stations for various types of users, changes in operating hours, development of new class of small business haulers, addition of services on adjacent land, and use of private service providers.) It is prudent to eliminate the acceptance of most standard curbside recyclables at transfer facilities, as it is more efficient and cost effective to collect them at the curb. The space and resources at the stations could be used instead for collection of other materials that are not easily collected curbside. King County estimated that its transfer stations and landfill received about 90,000 mattresses weighing more than 3000 tons for disposal in 2011. A policy should be developed to ban the disposal and recycle of these 90,000 mattresses.
5. Level of service criteria addressed in the 2006 Transfer Plan, with particular attention to options for revision to the travel time criterion requiring that ninety percent of a station's users be within thirty minutes' travel time; (please explore options such as 80% of system users within 40 minutes travel time. Options like this were not explored in the report. Please also revisit level of service criteria and recommend other changes that will meet King County's needs while providing future flexibility. For example, one such change could be that Bow Lake provides emergency storage for Algona.
6. Retention and repair costs of the existing Factoria transfer station including itemized cost estimates for retention and repair and updated long-term tonnage projections; and (please be sure retention and repair costs and the overall report takes into account adjacent land that King County already owns at Factoria, Algona, Houghton and other locations.
7. Recommendation "4" of the King County Performance Audit of Solid Waste Transfer Station Capital Projects, which requires systematic analysis of incremental cost impacts of the number, capacities and functionality of the transfer stations and assessment of project financing and delivery methods. (Debt service obligations are now increased and near-term ratepayers are going to pay more for the system and infrastructure than they need to past 2028 because of changes with number of cities participating in the ILA. Please have the King County Performance Audit updated.

In accordance with the requirements of Section B of the proviso, the division undertook this review and report with the participation of stakeholder groups, including the Metropolitan Solid Waste Management Advisory Committee (MSWMAC), the Sound Cities Association (SCA), the City of Bellevue, and the Solid Waste Advisory Committee (SWAC), among others. Documentation of stakeholder engagement and feedback received from stakeholders are included in Appendix A. Feedback was received but feedback was rebutted by King County Solid Waste and not incorporated to make a better transfer plan moving forward. Very little time was given for the study transfer station options and additionally very little time was given for feedback on the Draft report.

Transfer Plan review process

In 2004, when Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense.

Formatted: Font: 11 pt

Since that time, parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. More capacity has been created a Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted. The King County Transfer Station DRAFT Plan Review indicates differently and the above must be addressed.

What is the hurry? Do it correctly. Do it once and do it right.

This draft report is the result of a review process carried out in a collaborative (the process felt far from collaborative. Solid Waste pressed forward with the Base Plan), transparent manner with significant involvement from stakeholders. There will be a two week comment period during which written comments will be accepted. All written comments received will be addressed in a responsiveness summary and included in full in the final report.

For the review of the Transfer Plan, a series of three workshops were held in July, August, and September 2013. These were open to all interested parties; they were attended by:

- MSWMAC members,
- SWAC members,
- SCA representatives,
- Staff from 18 cities, including Bellevue
- Elected officials from XX cities
- Representatives of the four commercial solid waste haulers operating in King County
- Interested citizens,
- King County Auditor's staff, and
- King County Council staff.

The presentations, handouts, and supporting analysis provided at each of these workshops are available on the division's website. All questions and feedback received during the workshops are included in the workshop summaries, which are also available on the division's website. As recommended by the King County Auditor, the division analyzed the incremental cost impacts of the number of transfer stations by considering the effect on capital, operating, and collection costs if one or more of the stations were not constructed. (these costs were mainly provided in Workshop 3 with very little time for cities, committees and interested parties to process and comment of the cost data. Please allow and recommend more time.) This analysis can be found in Appendix B of this report and in the Workshop 3 materials. The cost and service impacts of functionalities of the transfer stations – compaction, self-haul and recycling (also see alternatives description), and storage capacity (please study the option of using storage capacity at newer transfer stations such as Bow Lake in an emergency and limiting emergency

service at older facilities such as Renton or Algona. Please also study the option of trailer storage of refuse on the adjacent land that King County owns in Algona and other facilities.)– were also studied. As part of the review process, the division presented information to stakeholders about project delivery and financing methods and Ordinance 17437, which requires that the division analyze for the South County and Northeast projects at least the following procurement methods: competitive negotiated procurement under chapter 36.58 RCW, traditional public works bidding, developer-delivered, with and without private financing, and design-build. (Please study the use of privately owner transfer stations and recycling centers and how they might substitute or supplement King County owned facilities)

In addition to the workshops, the division provided updates to the advisory committees during their normally scheduled meetings each month for the duration of the process. Feedback and discussion at those meetings is summarized in the meeting minutes, which are available online. (Please incorporate suggestions and comments received into the body of this report.)

The division provided briefings to:

- SCA,
- Regional Policy Committee (RPC), and (RPC was very concerned about the lack of time to process and comment on the draft report. Please recommend more time for the involvement of stakeholders.)
- meetings with city managers, mayors, and staff of four cities. (Please provide all King County cities with the same meetings)

Materials from these additional presentations are also provided on the website.

In collaboration with SCA, SWAC, and MSWMAC, the division developed the following principles to guide the review process:

Upon issue of the DRAFT Review, public perception is such that Solid Waste is pushing its agenda through at any expense.

Formatted: Font: 11 pt

Formatted: Font: Bold

Formatted: Normal, Space After: 0 pt

Guiding principles

- The system shall maximize ratepayer value and ensure that participants in King County’s solid waste system have access to efficient and reliable regional solid waste handling and disposal services at rates as low as reasonably possible, consistent with sound financial and environmental stewardship. Extending the life, remodeling and enhancement of the existing transfer stations will maximize rate payer value and provide rates as low as reasonably possible. This is achievable especially will some compromise on level of service objectives.
- Future system facilities will be designed to provide flexibility to accommodate changes in growth, anticipated future customer needs, and future waste disposal options and technologies. (Recommended changes found in audits and 3rd party reports from GBB report in 2007 and HERRERA report in 2013 have not been incorporated into the Transfer System Plan and this report. Processing recycling at Bow Lake and Shoreline is possible but would require extensive operational changes. Solid Waste should implement and understand tipping floor sorting and recycling before building new \$80 million transfer stations that might warrant changes.
- The system complies with all applicable state and federal law, including requirements for storage for disasters. Storage for disasters can be achieved using extra capacity on the inside of

Formatted: Superscript

newer transfer stations. In the event of a disaster, waste can also be directed from older transfer stations to newer transfer stations or to transfer stations outside the disaster area. Disaster refuse can also be stored in trailers at existing transfer stations and on adjacent land already owned by King County at locations such as Algona. Temporary direct haul Cedar Hills Landfill can be used in the event of a disaster. King County can also pursue disaster agreements with Seattle Solid Waste, Tacoma Refuse and other municipalities. Please incorporate these options into the report.

- This review will comply with the requirements of Ordinance 17619. The overall pursuit of alternatives even be it incremental improvements or changes is missing, thereby not arriving at the best solution for ratepayers. Solid Waste is overlooking the intent of Ordinance 17619 and its author(s).
- This review will be conducted in a transparent and collaborative manner between King County and its stakeholders, so that all parties have timely access to relevant data and determining factors for decision making.

Given the lack of innovation and Solid Waste's desire to continue with a minor variation of the Base Plan (possibly phase North King County), a third party independent review is necessary. An independent review happened in the original 2006 Plan and therefore it is important to do so now, if not more important given King County Solid Waste's position. Had King County Solid Waste demonstrated they are thinking outside the box in the Review and thorough in its reporting it may not be necessary, but because King County Solid Waste has not done so it is necessary to consult with an unbiased, independent third party.

Formatted: Font: 11 pt

A reduction in staff and lost jobs at King County Solid Waste would be a potential result in not building new transfer stations. King County Solid Waste staff could be biased in the preparation and presentation of information. A third party report will help insure the overall task and information is being processed in the most unbiased manner.

Formatted: Normal, No bullets or numbering

Background

In 1992, King County adopted a comprehensive solid waste management plan calling for the renovation of its aging urban transfer system. Without strong regional consensus about the need for improvements, a rate increase to support this plan was not approved. Since 1992, population growth, technological changes, and aging infrastructure have intensified the need for significant improvements. The 2001 *Comprehensive Solid Waste Management Plan* emphasized this need again.

Recognizing the need for a more coordinated approach to planning and decision-making, in 2004, the Metropolitan King County Council adopted Ordinance 14971, which prioritized evaluation of the urban transfer station network as an integral part of the analysis for the next comprehensive solid waste management plan, and established a process for collaborative (King County Solid Waste should be more collaborative) participation by the cities in solid waste planning. This process led to the formation of the MSWMAC.

Codified in KCC 10.25.110, Ordinance 14971 outlined an iterative, collaborative (King County Solid Waste should be more collaborative) process that would culminate in a package of recommendations for the urban transfer system. Along with division staff, SWAC, MSWMAC, and an Interjurisdictional Technical Staff Group comprised of staff from cities and from the King County Council analyzed the solid waste system through four milestone reports.

Milestone Reports 1 and 2 developed 17 criteria for evaluating the stations. These fall into three general categories of information: (please list all 17 level of service criteria for each station and do not lump together in three general categories as this creates confusion throughout the report)

- 1) level of service to users,
- 2) station capacity to handle solid waste and recyclable materials, and
- 3) the local and regional effects of each facility.

These criteria were applied to the existing urban transfer stations – Algona, Bow Lake, Factoria, Houghton, and Renton. Because Shoreline Recycling and Transfer Station was under construction at the time, it was not evaluated. Each of the five transfer stations failed to meet between seven and 12 of the evaluation criteria (Please detail out the specifics of failure for each criteria for each location and include the degree of failure and date of any future failures. King County Solid Waste should study how each failure can be improved upon or overcome. Incremental improvements will extend the life of transfer stations and provide future flexibility in the system. There are advantages to waiting before spending approximately \$80 million on a new transfer station.)—all of them were operating over capacity (to what degree and in what areas are they over capacity?) and failed to meet safety goals (how can we meet safety goals by remodeling/improving without building a new transfer station). These detailed evaluations demonstrated the need for major transfer system upgrades in order to continue providing environmentally sound solid waste disposal services (this can also be done with policy and other system changes) efficiently and effectively and at reasonable rates.

Milestone Report 3 discussed options for public and private sector roles in solid waste and recycling in King County. The recommendation was to retain the current mix of public-private operations where the private sector: (Please make at least some suggestions or modifications on how the private sector could positively impact the transfer stations and reduce the need to build new stations. Stakeholders are looking for solutions in as many areas as possible and the private sector can help. The private sector has the ability to reduce the demand on transfer stations.)

- provides curbside collection of garbage, recyclables, organics (yard waste, food scraps, and food-soiled paper), and construction and demolition debris (C&D), (More curbside collection of recyclables can be done and this reduces demand on the transfer stations)
- processes recyclable materials and C&D,

and the division: (Please include and further engage yard waste service providers in your report)

- provides solid waste transfer facilities,
- maintains the Cedar Hills landfill for disposal until it reaches capacity and closes, contracting for disposal once the landfill closes. {

Milestone Report 4 identified alternative configurations for the urban transfer station network and potential disposal options for the future. It also considered feasible options for long haul transport; the need for an intermodal facility or facilities; and the timing of waste export or other method of final disposal. A preferred alternative for the transfer system was identified.

These four milestone reports culminated in the Transfer Plan, (please update the changes that have happened since the which provides recommendations for upgrading the urban transfer station system; methods for extending the lifespan of Cedar Hills; and options for preparing the landfill for eventual closure. The Transfer Plan called for the Bow Lake and Factoria stations to be deconstructed, and new recycling and transfer stations to be built on the existing sites and adjacent properties. Both the Houghton and Algona stations would be closed and replaced with newly sited recycling and transfer stations in the Northeast and South County areas, respectively. The Renton station was approved for closure. Each of these individual transfer facilities needs to be studied on how they can be improved to

at meet some additional demand or level of service improvements.

The division's stakeholders had a significant role in shaping the recommendations in the Transfer Plan. At the conclusion of the process, both SWAC and MSWMAC recommended the plan to the King County Executive and the County Council. The stakeholders have not been given the same significant role and time in shaping this draft transfer station report. Please allow for this same opportunity.

Before final approval of the Transfer Plan, the County Council requested an independent third-party review of the Transfer Plan, which was conducted by the firm Gershman, Brickner & Bratton, Inc. (GBB). GBB fully supported the primary objectives of the plan: to modernize the transfer station system and maximize the lifespan of the Cedar Hills landfill. The County Council unanimously approved the Transfer Plan in December 2007. A new independent third party study needs to be completed with the issuance of the new Transfer Station Plan.

Since the approval of the Transfer Plan, the division has completed construction of the new Bow Lake Recycling and Transfer Station in Tukwila; completed design and permitting of a new Factoria Recycling and Transfer Station in Bellevue; and begun the siting process for a new South County Recycling and Transfer Station to replace the aging Algona facility. Since the approval of the plan, King County has acquired additional adjacent land which can be used to make level of service improvements. Please evaluate how this additional land can be used to make improvements other than replacement of the existing Algona facility.

The new Bow Lake Recycling and Transfer Station (RTS) is capable of handling one third of the system's waste in a fully enclosed building reduces noise, litter, and odors. It is projected to achieve a Gold level certification through the internationally recognized Leadership in Energy and Environmental Design (LEED) Rating System. Bow Lake has extra land available. Please note this in the report and how this land can be used to mitigate changes and increased demand in the future.

(Please flesh out the use, option and impacts of more participation with private service providers as noted in Milestone Report 1, 2,3and 4. Many dates, costs and factors have changed since these reports have been issued.)

The following policy and program initiatives resonated as the top opportunities from outside research that have real potential for King County, and address the primary constraints identified: Maximize the use of disposal bans where markets are in place in order to divert materials and products to the appropriate private reuse and recycling infrastructure. Refine the use of recycling fees to emphasize curbside collection of traditional recyclables and to create more opportunity for other targeted materials. Enhance program initiatives in product stewardship and use public collection and processing infrastructure to leverage existing or developing private collection and processing infrastructure. Refine waste acceptance and handling policies that restrict more active involvement by County staff in facilitating diversion of materials to reuse and recycling.

Factors for Review

A new ILA was just adopted and new language, provisions, policies and requirements are contained in the newly signed agreement. Please review these changes and how they impact the overall Solid Waste Plan and the Transfer System Plan.

The division and its stakeholders considered all of this background information when evaluating the Transfer Plan against today's conditions of reduced tonnage and extended interlocal agreements with cities generating approximately 90 percent of the system's tonnage. For this review, at the request of SCA and other key stakeholders, the division also analyzed eight modifications to the Transfer Plan. The impacts to cost, service, and the environment for each of the nine total alternatives were evaluated. These included the existing Base Alternative plus eight new alternatives (Tables 1.a and 1.b) that did not build all planned new facilities or that maintained as self-haul only facilities currently planned for closure. More alternatives and or combinations of alternatives need to be studied. Additionally options on how they get purposed whether it be for self-haul, commercial haul, yard waste or recycling.

Cost

The following costs need to be presented in a systematic manner with incremental costs presented for each station being remodeled in addition to the proposed rebuild. Costs figures need to be presented in a more incremental way. Solid Waste has lumped alternatives together which could be appropriate but in doing so confuses the reader and also presents the information in a complicated manner.

Formatted: Normal

Formatted: Font: 11 pt

To answer the central question of whether costs could be reduced while still providing the desired level of service, the division examined total ratepayer impacts of the various alternatives, comprised of the components below. Summary capital cost estimates are provided in the descriptions of the alternatives. Additional cost information can be found in Appendix B.

King County is scheduled to conduct a rate study in 2014. The rate study and results should be incorporated into this report. A rate study has not been done for a number of years.

Formatted: Normal

King County solid waste disposal rates are significantly lower than the tipping fees in adjacent jurisdictions. How will changes in rates affect future system demand and reduce the need to build new transfer stations?

Capital cost

Development of a framework for financial policies and host city mitigation, including compensation agreements needs to be studied in this report.

Capital costs are influenced by the number of facilities and the size and complexity of those facilities. The division pays for capital and other costs through disposal rates. The current rate includes debt service for the Shoreline and Bow Lake stations. The current rate includes payments on the capital costs of the Shoreline and Bow Lake stations. Shoreline and Bow Lake capital costs should be paid off before 2028 because of the withdrawal of Bellevue and other cities from the interlocal agreement.

This review included costs involved in construction of a new transfer facility with detailed consideration of cost drivers (both those of particular interest to stakeholders and those identified as cost drivers in a 2011 Performance Audit of Solid Waste Transfer Station Capital Projects). Cost drivers included installation of waste compactors, space to provide self-haul and recycling services, and emergency storage capacity. Capital costs also include possible renovation of existing facilities, such as Algona, to operate as self-haul only facilities. These analyses are provided in Appendix B.

Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 – 2028. This affects the Houghton Transfer Station and Bellevue. This is a short term problem and therefore a short term solution is warranted. By continuing with the long term plan and if cities do not renew the Inter Local Agreement then there are fewer people to share the capital costs. Changes to the ILA's and the cities participating in the system will impact the development and configuration of the system, future capital investments, services and rates.

Formatted: Font: 11 pt

Please study the benefits of restricting use or changing the rates for users from Pierce County using the Algona Transfer Station.

Please study the benefits of restricting use or changing the rates for users from the City of Seattle using Bow Lake, Renton and Shoreline Transfer Stations.

Please study the benefits of restricting use or changing the rates for users from the City of Bellevue after the year 2028 using Factoria and Houghton Transfer Stations.

Operating cost

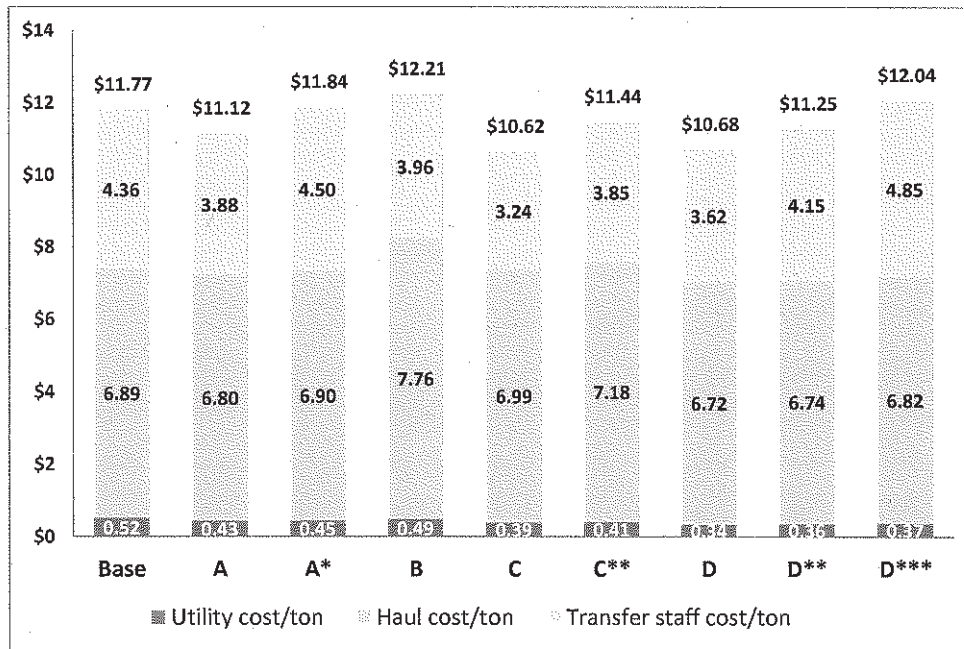
Operating costs include many varied costs, some of which are fixed or overhead costs, such as payroll, so to distinguish between alternatives, this review focused on the primary variable cost components. Three factors were used for this cost comparison:

1. Operating hours – the more hours a facility is open the higher the cost of staffing. (Extending operating hours is a very cost effective use of facilities. Please study extending hours of operation at each station as a means to mitigate wait times and provide further options for both commercial and self-haul.
2. Distance to disposal – the further a transfer station is from the disposal location the higher the hauling cost. This is the most significant factor because it involves staff time, fuel, and equipment. It is also the most uncertain because locations for two of the transfer stations and disposal after Cedar Hills closes are unknown, so the analysis used proxy locations.
3. Tipping area square footage – the larger the facility the higher the cost of utilities.

These estimates are provided for the purpose of comparing alternatives only; to obtain a cost per ton, the tonnage estimate for 2027¹ was used; costs are shown in 2013 dollars.

¹There is no particular significance to 2027. Dollar amounts would vary, but the comparison would be same regardless of the year (after full implementation of the alternative).

Figure 1 – Estimated Solid Waste Division Operating Cost per Ton per Alternative (2013\$, 2027 tonnage)



Note: See Tables 1.a and 1.b for a summary of the alternatives.

Collection cost

Overall collection costs increase when there are fewer facilities to serve the commercial haulers who provide collection service for homes and businesses. (Please mention currently used private transfer stations in use for yard waste, recycling, construction debris and refuse. More private transfer stations can be reintroduced.) Some transfer system alternatives that would reduce capital costs for County facilities would increase costs to the commercial solid waste collection companies – and ultimately ratepayers. Unlike capital costs, which are uniformly distributed throughout the system, increased collection costs are not equally distributed among ratepayers. Increased collection costs resulting from longer hauling distances will raise rates for residents in areas that are not served by transfer facilities. Thus it was important to consider collection costs in order to understand the true impact on residents and businesses of any transfer system alternative. Please study the alternative whereby no transfer stations are closed and transfer stations are remodeled with commercial service remaining at all locations. This alternative will likely result in the lowest collection costs and therefore an important alternative to consider in this report.

All three commercial hauling companies serving the areas evaluated in the Transfer Plan responded to the division’s request for information. They provided preliminary estimates of collection-cost impacts that would result from changes to the Base Plan. (please have haulers provide more detailed costs and suggest various cost alternatives to further consideration.) Those increased costs would be passed on to

residents and businesses. The division believes that the estimates provide a reasonable approximation of potential increased costs. Please don't use approximate costs when studying this important haul cost factors. As one hauler noted, "A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates." A summary of the information supplied by the haulers can be found in Table 5. The complete information provided by haulers is in Appendix B. Traffic studies should be performed verses using web based drive times. Specific frequency and length of wait times should be studied. An overall rate study on collection costs and other costs should be performed.

Cities negotiate contracts with their haulers and should be given time to discuss options and costs with their current haulers and other potential haulers.

The results show that collection costs would be lowest under the Base Alternative, and rise as the number of facilities serving commercial haulers decreases and collection trucks need to be on the road for longer distances, burning more fuel and spending more time in traffic. Please study the option of not closing any transfer stations to haulers. The haulers' capital costs increase with more trucks traveling longer routes. In some cases capital costs increase up to \$15 million (Alternatives C and D) for one hauler alone. Labor costs would rise correspondingly, up to \$4.5 million for that same hauler in additional staff hours per year. The Northeast and South County service areas are forecast to have the highest growth, and become the most densely populated areas in King County by 2035 (please provide data on population and density in this report). Alternatives that do not build facilities in either of those areas (Alternatives D** and D***) will impact collection rates for the greatest number of people. Alternatives that do not build Factoria or South County (Alternatives B, C, and C**) will result in the highest rates for customers in those service areas; one hauler estimates a rate increase of five percent over the Base Alternative. Please study the option of having haulers directed to specific transfer stations.

Please include the impact of the possible future changes Cedar Hills Landfill rent payments to users for the use of Cedar Hills Landfill.

Please include possible future costs to haul waste outside King County when Cedar Hills Landfill is projected to reach capacity in 2028 which is before the end of this study and the ILA in 2040.

Service and Capacity

Seventeen criteria for level of service (LOS) were developed for the original Transfer Plan. These criteria fall into three general categories:

1. Level of Service to Users – Criteria 1 through 4 define standards for acceptable user experience, such as drive time and speed of service
2. Station Capacity for Solid waste and Recycling – Criteria 5 through 12 define operational standards for a cost-effective and efficient system
3. Local and Regional Effects of Facility – Criteria 13 through 17 set standards for impacts to local roadways and nearby land uses; although these criteria are separate from the requirements of King County's Equity and Social Justice Ordinance, they provide an opportunity to begin discussions of ESJ. Please fully incorporate ESJ into this report.

This review process reconsidered whether the original criteria were still appropriate standards for measuring level of service. Please further study all original 17 level of service criteria and recommend even small changes that will help improve the transfer system or specifically reduce the need to new

transfer stations. As required by the ordinance, the division thoroughly evaluated Criterion 1, travel-time to reach a transfer facility. (Please include specifics of drive times into the body of this report so stakeholders and understand the specific information) Analysis of drive time for each alternative is presented in Appendix C. The division found that seven of the nine alternatives met this criterion. Alternatives C and D failed this criterion because of limited self-haul service in the South County area. Please specify details of frequency of failure and possible solutions to minimize failure. Please note the option of current and future additional rural drop boxes to help provide options and mitigate drive times. The analysis used drive times provided by Google Maps. When looking at the specifics of failure it appears failure is very isolated and limited.

Criteria in the second group, those relating to station capacity, are critical from an operational perspective, and can have cascading effects on other criteria. For both the original planning process and the current review, a level of service score no lower than “C” for the duration of the planning period was used as the standard for acceptable service. This means that the system must be able to accommodate vehicles and tonnage at all times of day except occasional peak hours; the optimal operating capacity should be exceeded for only five to 10 percent of operating hours. The scoring system is too negative in its rating scale. A wait time slightly exceeding 10% would equate to failure and this over dramatizes the wait time issue. Please be transparent in the presentation of information and don’t project a bias.

For this review, only one criterion needed to be somewhat redefined – Criterion 8, “room to expand on-site.” This criterion originally considered whether it was possible to build a larger station on the site, which would not be an important consideration in relation to newly sited or constructed facilities. In this analysis the criterion was redefined to determine whether space was available to expand services or to support waste conversion technology in the future.

During the development of the original Transfer Plan, these criteria were applied to each existing urban transfer station. This review applied the LOS criteria to each alternative (Table 3), evaluating the system configuration as a whole. A summary of the vehicle and tonnage capacity LOS score for each facility under each of the nine alternatives is available online.

King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility in addressing “issues”. Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Formatted: Font: 11 pt

The division has committed to providing service to self-haulers, viewing the solid waste disposal network as a public system that exists for the benefit of the community. The policies in the current *2001 Comprehensive Solid Waste Management Plan* and the draft *2013 Comprehensive Solid Waste Management Plan* call for the division to provide transfer service to self-haulers. Both plans also include policies to provide substantially more recycling opportunities at the transfer stations than is possible in the current facilities. However, feedback at the initial workshop indicated that stakeholders were interested in examining alternatives that would limit self-haul and recycling services. The division did develop and analyze alternatives with these limitations. Preliminary feedback from subsequent workshops, as well as past experience (such as the public response to elimination of recycling services at some stations in 2011) indicates that many stakeholders continue to value these services highly. Please fully explore options, incentives, restrictions, policies and changes with self-hauling. A combination of changes to self-hauling with extend the life and potentially reduce demand on the transfer station

system. Increasing tipping and self-haul rates to meet or exceed neighboring municipalities such as Seattle, Tacoma and Pierce County will reduce demand on our transfer system. Please specifically study the elasticity and changes to rates and tipping fees.

Environment

Environmental impacts of the system alternatives may include construction and siting impacts, greenhouse gas (GHG) emissions, and recycling opportunities. The combination of facilities in each alternative would result in unique traffic conditions and patterns, with resulting GHG emissions. This analysis reviews environmental impacts based on existing information. More detailed analysis would likely be required for any alternative other than the Base Alternative, which has already undergone environmental review under SEPA. (Please report on the increased use and of alternative fuels such as compressed natural gas by commercial haulers.) The report should mention that new trucks are also more fuel efficient.

As a general rule, traffic impacts and resulting GHG emissions are minimized by increasing the number of facilities, by distributing facilities evenly throughout the service area, and by compacting waste before hauling to disposal (compactors reduce transfer trailer trips by about one third). With fewer facilities customers would drive further to reach facilities, increasing traffic and GHG emissions. The more customers directed to a single facility, the more concentrated traffic impacts would be on the streets neighboring that facility, although mitigation may be possible. Please study the impact of potential increased use of onsite waste compactors by commercial property owners and apartments thereby dramatically reducing traffic and GHG emissions.

Both the current adopted (2001) and draft 2013 Comprehensive Solid Waste Management Plans call for maximizing recycling. In 2012, approximately 115,000 tons of recyclable materials were disposed by self-haulers and buried at Cedar Hills. The current self-haul recycling rate is only five percent, but must increase to 35 percent if we are to meet the 70 percent goal developed jointly by the division and its advisory committees. Currently, only Shoreline and Bow Lake are capable of supporting such growth in self-haul recycling. The recycling options available under each alternative are shown in Table 2. Recycling rate analysis for each alternative was beyond the scope of this review; however, the LOS criteria do identify which alternatives provide sufficient infrastructure to support increased recycling. More information about recycling at transfer stations is available online. In general, recycling has far reaching environmental benefits; however, environmental analysis related to the recycling options for each alternative was beyond the scope of this review.

All alternatives assume that new transfer facilities would be fully enclosed to minimize community impacts, including noise, odor, and litter. Resembling a commercial warehouse, these buildings are much more compatible than the old open structures with a variety of surrounding land uses that may be likely to develop over the 40-year to 50-year lifespan of the building. Some alternatives retain the current Houghton and Algona facilities, which would not be fully enclosed and would not include waste compaction. Community impacts such as noise, odor, and traffic on neighboring streets would be included in environmental review under SEPA.

Risks

Each alternative presents a unique combination of risks that must be considered together with other factors. Initial identification of risks is included in the description of each alternative.

Assumptions

In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available, for example, where might facilities that have not yet been sited be located. To predict solid waste generation over the long term, the long-term tonnage forecast model relies on well-established statistical relationships between waste generation and various economic and demographic variables, such as:

- population of the service area
- employment rates
- household size
- per capita income adjusted for inflation

Please provide data used by King County to make assumptions in the body of the report and also appendices.

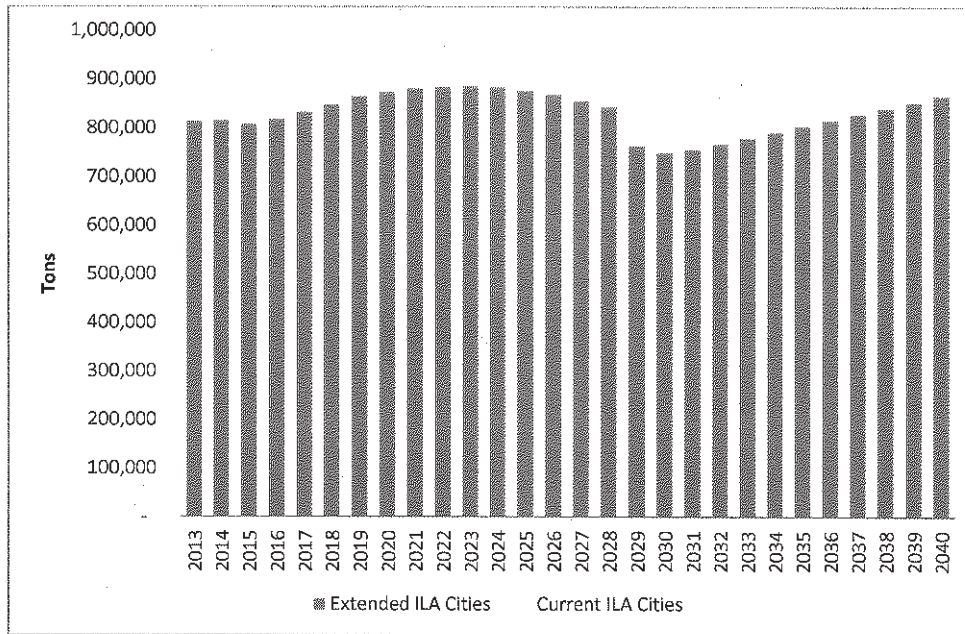
Increases in population, employment, and per capita income, and decreases in household size typically lead to more consumption and hence more waste generated.

Analysis performed as part of this review used the following assumptions:

- The tonnage forecast starts with today's actual tonnage and assumes that Bellevue, Clyde Hill, Hunts Point, Medina, and Yarrow Point will leave the system July 2028 (see Figure 2 for tonnage projections)
- Where possible, facilities would be designed to meet capacity needs with a minimum LOS score of C, which is defined as able to accommodate vehicles and tonnage at all times of day except occasional peak hours (optimal operating capacity exceeded 5 to 10 percent of hours) This criteria is too restrictive. Please also study LOS score of D or better. A LOS score of B or better is optimal and then a LOS score of C is failure. These LOS scores are too close together and the LOS scoring system need to change.
- All new stations would share a similar design to that of the currently designed new Factoria station, although the size would depend on capacity needs. Flat tipping floors are not be used for recycling and should be implemented and understood and possibly modified before new stations are built.
- All new stations would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve
- Alternative project financing and delivery methods would be evaluated for each new station to identify potential cost savings
- Any limitations to self-haul would not apply to customers with a division charge account
- For planning purposes, generic locations for South County and Northeast were assigned within the service area; Cedar Hills served as a proxy disposal location. Please provide a second proxy location other than Cedar Hills Landfill due to the expected capacity constraints prior to 2040.
- Cost estimates are planning-level; where escalated costs are given, costs were inflated using projections from the Office of Economic and Financial Analysis
- Recycling Scenario Three (Figure 3) provided the standard for full recycling services; several scenarios do not achieve standard recycling service levels
- Revenue will be based on tonnage projections, such that:
revenue = projected tonnage x solid waste tip fee, where tip fees are set to cover expenses

- A rate study, to be performed in 2014, will incorporate decisions resulting from this review. The rate study to be performed in 2014 should first be incorporated into this report prior to issuance of the final transfer station report.

Figure 2 – Long-term Tonnage Forecast of Waste Disposed



Based on trends, the tonnage forecast assumes a one percent increase in recycling per year with a maximum recycling rate of 70 percent. The table above shows the tonnage from the cities that have not signed extended interlocal agreements as Non ILA Cities after June 2028. Tonnage from those cities was excluded when evaluating the Alternatives.

Alternatives

Formatted: Font: 11 pt

What could Solid Waste add to existing transfer stations (i.e. recycling, yard waste) to mitigate issues vs. building an ideal transfer station based on a dated Transfer and Waste Management Plan. Do not let ideal features decide the future size and use of transfer stations. Rather, the approach King County Solid Waste should take is: what can be added to existing transfer stations to mitigate solid waste and transfer matters? There is an innovative way to provide similar services at transfer stations but address how each transfer station will accomplish it differently.

Five basic alternatives include the current plan as developed in 2006 (the Base Alternative), as well as four alternatives that do not build one or more of the planned new recycling and transfer stations. These five alternatives are supplemented by four variations that would close Houghton and/or Algona to commercial hauler traffic (i.e., they would be self-haul-only facilities.) This gives a total of nine alternatives for consideration.

Should King County co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities?

Should King County construct a regional resource recovery park for multiple recyclable and compostable materials at a new site and how will this affect the overall transfer station system?

Should King County site, design and build new King County solid waste facilities to align collection and processing in advanced materials management system and how would this affect transfer stations?

Table 1.a – Transfer System Alternatives

	Base (Current Plan)	Alternative A	Alternative B	Alternative C	Alternative D
Open facilities	Shoreline	Shoreline	Shoreline	Shoreline	Shoreline
	Bow Lake	Bow Lake	Bow Lake	Bow Lake	Bow Lake
	Factoria	Expanded Factoria			Expanded Factoria
	Northeast		Expanded Northeast	Expanded Northeast	
	South County	South County	South County		
Closed facilities	Algona	Algona	Algona	Algona	Algona
	Renton	Renton	Renton	Renton	Renton
	Houghton	Houghton	Houghton	Houghton	Houghton
Do not build		Northeast	Factoria	Factoria South County	Northeast South County

Table 1.b – Transfer System Alternatives with Self-haul Only Facilities

	Alternative A*	Alternative C**	Alternative D**	Alternative D***
Open facilities	Shoreline	Shoreline	Shoreline	Shoreline
	Bow Lake	Bow Lake	Bow Lake	Bow Lake
	Expanded Factoria		Expanded Factoria	Expanded Factoria
		Expanded Northeast		
	South County	Algona (self-haul only)	Algona (self-haul only)	Algona (self-haul only)
	Houghton (self-haul only)		Houghton (self-haul only)	
Closed facilities	Algona			
	Renton	Renton	Renton	Renton
		Houghton	Houghton	
Do not build	Northeast	Factoria	Northeast	Northeast
		South County	South County	South County

Please look at not closing Renton, Houghton and Algona transfer stations and further evaluate alternatives around these.

Renton is closed in all alternatives and this affects South King County where a new transfer station is being considered. It makes no sense to close the Renton transfer station thereby causing system constraints that lead to building a new location. Please evaluate keeping Renton open in all alternatives.

Recycling Services

King County code (KCC 10.12.021.G) allows fees for recycling to be set lower than those for disposal to encourage recycling over disposal. The use of differential fees is an important tool for increasing reuse and recycling. Please study the impacts of changes in fees and future needs of transfer stations. Numerous cities in King County do not require curbside recycling and please study the impacts of this in the report.

The standard for recycling services was set to meet the recycling goals established in collaboration with SWAC and MSWMAC for the draft 2013 Comprehensive Solid Waste Management Plan. (the mission of King County's waste reduction and recycling programs is to divert as much material as possible from disposal in a manner which reduces the overall costs of solid waste management to county residents and businesses, conserves resources, protects the environment and strengthens the county's economy.

The draft 2013 Comprehensive Solid Waste Management Plan should be updated and incorporate the July 2013 HERRERA Optimized Transfer Station Recycling Study before issuing the 2013 Comprehensive Solid Waste Management Plan in its final form.) The HERRERA report presented 139 recycling strategies and these were allocated among station generations as follows: • Sixty-four (64) strategies were applicable to all stations • Seven (7) strategies were applicable to older stations only • Forty-one (41) strategies were applicable to updated/retrofitted stations AND new stations • Fifteen (15) strategies were applicable to new stations only. These 139 strategies need to be fully considered before building or closing any transfer stations. It is described here in Figure 3, and was presented as “Scenario Three” at the workshops. (SWAC and MSWMAC and KCSW should review the July 2013 HERRERA Optimized Transfer Station Recycling Study and consider revising the Recycling Scenario 3 before this Draft Transfer Station Plan Review is adopted.

Figure 3 – Standard Recycling Service

8/22/2013
Transfer Plan Review Workshop 2
3

Recycling Scenario 3

Flexibility to collect a wide range of materials

<p>Curbside Mix</p> <ul style="list-style-type: none"> • Corrugated Cardboard, Mixed Paper & Newspaper • PET & HDPE Plastic Bottles • Other Rigid Plastic Containers • Plastic Film • Aluminum Cans, Tinned Food Cans & Glass Containers <p>Organics</p> <ul style="list-style-type: none"> • Yard Waste • Food Waste & Soiled Paper <p>Metal</p> <ul style="list-style-type: none"> • Scrap metal • Appliances 	<p>Construction & Demolition Debris</p> <ul style="list-style-type: none"> • Clean Wood • Gypsum Wallboard • Asphalt Shingles • Carpet & Carpet Pad <p>Bulky Items</p> <ul style="list-style-type: none"> • Furniture • Mattresses • Tires <p>Reusables</p> <ul style="list-style-type: none"> • Building Materials (events) • Household Goods • Textiles & Clothes • Bicycles
---	--

Allows for flexibility to remove recyclables from the waste stream and consider alternative processing

What if we another and more rigorous Recycling Scenario is licked and how would this change transfer system demand and requirements?

Disposal bans at transfer facilities for priority materials such as clean wood, scrap metal, yard (and land clearing) waste, mattresses, and cardboard are not being used to the maximum extent possible to advance Zero Waste of Resources goals.

Additional information about recycling at transfer stations was presented at the first workshop. That presentation is available [online](#). The recycling services available under each alternative are described in

Table 2. Overall recycling and zero-waste initiative goals are lacking in this report and have a very significant influence on how we use the King County Transfer System.

Table 2 – Recycling Services by Alternative

	Base	A	A*	B	C	C**	D	D**	D***
Shoreline	Full service	Full service	Full service	Full service	Full service	Full service	Full service	Full service	Full service
Bow Lake	Full service	Full service	Full service	Full service	Weekends and limited weekday hours	Weekends and limited weekday hours	Weekends and limited weekday hours	Weekends and limited weekday hours	Weekends and limited weekday hours
Factoria	Full service	Full service	Weekends and limited weekday hours				Full service	Full service	Weekends and limited weekday hours
Northeast	Full service			Full service	Full service	Full service			
South County	Full service	Full service	Full service	Full service					
Houghton			Yard waste and limited other materials						Yard waste and limited other materials
Algona						Yard waste only		Yard waste only	Yard waste only

A fee on traditional material recycling at transfer stations should compel customers to place them into the curbside collection system, if it is available, rather than travel to transfer facilities. This reduces vehicle travel overall, and produces fewer emissions.

The updated level of service criteria were applied to each of the nine alternatives. Whereas the initial planning process used these standards to evaluate each of the existing urban transfer stations, for this review process, the standards were used to evaluate each alternative as a whole. The level of service criteria are applied to all nine alternatives in Table 3, preceding the full descriptions of each alternative.

Please spell out specifics on when limitations are put on recycling because of system constraints. Such as in what year and how often recycling and other service capacities are overloaded.

Table 3
Transfer Plan Level-of-Service Criteria Applied to Alternatives¹

		Base	A	A*	B	C	C**	D	D**	D***
1. Estimated time to a transfer facility within the service area for 90% of users	< 30 min = YES	YES	YES	YES	YES	NO ²	YES	NO ³	YES	YES
2. Time on site meets standard for 90% of trips⁴										
a. commercial vehicles	< 16 min = YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
b. business self-haulers	< 30 min = YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
c. residential self-haulers	< 30 min = YES	YES	YES	NO	YES	NO	NO	NO	NO	NO
3. Facility hours meet user demand⁵	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
4. Recycling services meet Plan policies										
a. business self-haulers	YES/NO	YES	YES	NO	YES	NO	NO	NO	NO	NO
b. residential self-haulers	YES/NO	YES	YES	NO	YES	NO	NO	NO	NO	NO
5. Vehicle capacity⁶										
a. meets 2027 forecast needs	YES/NO	YES	YES	NO	YES	NO	NO	NO	NO	NO
b. meets 2040 forecast needs	YES/NO	YES	YES	NO	YES	NO	NO	NO	NO	NO
6. Average daily handling capacity (tons)										
a. meets 2027 forecast needs	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
b. meets 2040 forecast needs	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
7. Space for 3 days' storage										
a. at time of construction	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
b. meets 2040 forecast needs	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
8. Space to expand on-site⁷	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
9. Minimum roof clearance of 25 ft.	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES

¹ Criteria applied to the overall Alternative – individual transfer station scores may vary

² See [drive time map 8](#)

³ See [drive time map 13](#)

⁴ Based on vehicle capacity LOS rating

⁵ Hours may be adjusted at some facilities to meet user demand

⁶ "NO" if one or more facilities in the alternative did not have an LOS score of at least a C – see vehicle capacity in "[Alternatives Station Detail](#)" for information about each facility

⁷ This criterion has been adapted to indicate future flexibility to expand service, e.g., household hazardous waste, or to support waste conversion technology

		Base	A	A*	B	C	C**	D	D**	D***
10. Meets facility safety goals	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
11. Ability to compact waste	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
12. Safety										
a. Meets goals for structural integrity	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
b. Meets FEMA immediate occupancy standards	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
13. Meets applicable local noise ordinance levels	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
14. Meets PSCAA standards for odors	YES/NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
15. Meets goals for traffic on local streets⁸										
a. Meets LOS standard	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
b. Traffic does not extend onto local streets 95% of the time	YES/NO	YES	YES	NO	YES	YES	NO	YES	NO	NO
16. 100 foot buffer between active area and nearest residence	YES/NO	YES	YES	NO	YES	YES	YES	YES	YES	NO
17. Transfer station is compatible with surrounding land use	YES/NO	YES	NO	NO	YES	YES	YES	NO	NO	NO

Drive time maps have multiple overlaps whereby 90% of users can still choose other transfer stations or regional drop boxes to access. Please make sure this is option is clear to the readers of this report.

Please apply criteria in the report to each facility and do not lump into alternative groups.

Please suggest ways to meet criteria at each location and also as a group. Ideas include keeping Renton open, creating new alternatives, additional remodel, and use of adjacent land.

⁸ Represents an assumed outcome based on vehicle capacity LOS rating; this criterion would need a more thorough assessment

Table 4
Estimated Capital Cost
Added cost per month for the average household
(estimated median cost of capital debt 2014-2040)

Alternative	Monthly Cost
Base	\$ 1.08
A	\$ 0.92
A*	\$ 0.66
B	\$ 0.93
C	\$ 0.56
C**	\$ 0.61
D	\$ 0.55
D**	\$ 0.60
D***	\$ 0.34

If an existing transfer station is lacking – what can be done to mitigate the shortcoming? Can services and technologies at existing facilities be installed to provide similar services throughout transfer stations? Is it necessary for each facility to compact? What can be done to mitigate these sorts of issues? The Transfer Station Draft Plan Review fails to address this issue as well as address the use of technology and policies to mitigate existing sites.

Formatted: Font: 11 pt, Not Bold

Base Alternative (Current Transfer Plan)

The Base Alternative implements the current Transfer Plan, which was adopted by the County Council in December 2007. This plan calls for the county to:

- Build a new Factoria recycling and transfer station as currently designed and permitted, with phase 1 (garbage) opening in 2016, and phase 2 (recycle and HHW) opening in 2017, and demolition of the existing Factoria transfer station
- Close Renton in 2018 Nowhere in the report do you evaluate an alternative where Renton is kept open. Please evaluate leaving Renton open.
- Build a new South County recycling and transfer station to open in 2019 on one of three sites currently being evaluated Please evaluate the use of the additional land that King County purchased in Algona. This can be used as expansion space for Algona while keeping or remodeling the current structure. It is a major oversight not to consider how this additional land can be used to meet current needs, add services or come closer to meeting criteria.

- Close the Algona transfer station in 2020, making that property available for other use
- Site a new Northeast recycling and transfer station somewhere in the service area currently being served by Houghton to open in 2020
- Close the Houghton transfer station in 2021
- All stations would provide pre-load compaction, three days storage capacity, self-haul service during all operating hours, and full recycling services as described in Figure 3.

The Base Alternative is the most expensive in terms of capital costs. However, with five transfer stations dispersed across the county, particularly in the forecasted high growth areas of Northeast and South County, collection costs are expected to be lower than the other alternatives. This plan supports the targeted self-haul, recycling, and compaction objectives providing the highest level of service amongst all options under consideration. The primary risks are associated with the typical siting challenges for a transfer station.

Cost

With a total of five newly constructed modern transfer and recycling facilities, three of which have yet to be built, this alternative has the highest capital costs. Preliminary planning-level estimates (in 2013 dollars) place future capital costs for this alternative at \$222 million; this would translate to an added cost of about \$1.10 per month for the average household (estimated median cost of capital debt 2014-2040). All new facilities would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. Alternative project financing and delivery methods would be evaluated for each new station built to identify potential cost savings.

The Renton Transfer Station would close under this alternative, so collection cost for residents and businesses in the Renton area would increase as commercial haulers are redirected to the Bow Lake and Factoria facilities. One area hauler estimates a less than a one percent increase in operational or customer costs; a second hauler estimates an increase of \$1 to 2 million per year in added driver hours and trips and an additional \$3 to 6 million in capital costs such as additional trucks.

Service

This is one of only two alternatives that meet all of the level of service standards developed by consensus with regional stakeholders to evaluate satisfactory system performance. A full range of recycling services would be available to self-haulers and self-haul service would be available at all facilities during all hours of operation to support the region's recycling goal.

This alternative provides the greatest number of transfer facilities, evenly distributed throughout the regional system. Therefore all areas of the system would receive a uniform high level of service.

Environment

The Base Alternative minimizes impacts by incorporating compactors at every facility, which significantly reduces the number of transfer trailer trips generating traffic and GHGs. With the greatest number of full-service facilities evenly distributed throughout the system, this alternative also minimizes the environmental impacts of customer trips, as well as the intensity of impacts on streets neighboring each facility.

Risks/Challenges

This alternative requires siting two new facilities. Siting any new facility is challenging and comes with the risk that an appropriate site will not be identified.

There is also an opportunity for thinking differently about the flow of material, such as partnering with Cities for alternative spaces and drop box sites using City real estate.

Alternative A

In this alternative, plans for the South County are not changed, but Factoria serves the east/northeast county without the addition of a new Northeast station. Please evaluate this exact same option without a larger Factoria facility and no new South King County location while leaving Renton, Houghton and Algona open.

- Do not build Northeast
- Increase the size of Factoria to accommodate an expanded service area, requiring use of the Eastgate property, opening in 2020/2021
- Close Houghton in 2021
- Close Renton in 2018
- Build a new South County recycling and transfer station to open in 2019 on one of three sites currently being evaluated
- Close the Algona transfer station in 2020, making that property available for other use

The Factoria recycling and transfer station would:

- Have two buildings – one for commercial customers on the currently permitted property and one for self-haul customers on the “Eastgate” property
- The commercial building would be equipped with waste compactors; the self-haul building would not, however space would be available to add compaction later if desired Why would you not add compaction to self-haul at time of construction?
- The commercial building would be open 5 days a week with extended evening hours
- The self-haul building would be open 7 days a week with standard operating hours
- A full range of recycling would be available for self-haulers
- Household hazardous waste (HHW) service would be available 6 days a week for residents and businesses that generate small quantities

This option provides desirable self-haul, recycling, and compaction at all operating facilities. It would build a new and expanded Factoria requiring the use of the upper property known as the Eastgate since the current location is not big enough to meet the service needs for the entire east/northeast service area. The expanded capacity in South County would help address the forecasted population growth in that region, but the same could not be said for the Northeast part of the county. This alternative has one of the most expensive capital costs at \$186 million. Although tonnage and vehicle capacity would not be a concern with this option, the reduction in total stations and in particular the lack of a Northeast station would increase collection costs over the Base Alternative. Additionally, Bellevue has expressed concern in regards to probable land use conflicts with the Eastgate property. Aburn and Algona have also expressed concern about the 3 replacement sites being evaluated for South King County.

Cost

Alternative A is among the higher-costing alternatives for capital costs, estimated at \$186 million in 2013 dollars. This would add about \$0.90 per month for the average household (estimated median cost of capital debt 2014-2040). Estimated costs for the Factoria Recycling and Transfer Station would increase with the expanded function of that facility, but this increase is more than offset by the elimination of all capital costs for the Northeast facility, which would not be built. As with each of the alternatives, all new facilities would be subjected to value engineering and sized according to the most current tonnage

forecasts for the area the facility would serve. Alternative project financing and delivery methods would be evaluated for each new station built to identify potential cost savings.

The Renton Transfer Station would close under this alternative, so collection costs for residents and businesses in the Renton area would increase as commercial haulers are redirected to the Bow Lake and Factoria facilities. The Houghton Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Bothell, Woodinville, Kirkland, Redmond, Duvall, and Carnation areas would increase as commercial haulers are redirected to the Factoria and Shoreline facilities. Cost may also increase for customers in Lake Forest Park and Kenmore, because although the Shoreline station is nearby, the hauler serving this area is currently using the Houghton transfer station for end-of-day trips based on proximity to their base location. One area hauler estimates a less than a one percent increase in operational or customer costs; a second hauler estimates an increase of \$1.5 to 2.5 million per year in added driver hours and trips and an additional \$6 to 9 million in capital costs such as additional trucks. Evaluate this same alternative whereby Houghton is left open and no increase in the size of Factoria.

Service

This alternative meets all level of service standards except Criterion 17, "Transfer station is compatible with surrounding land use." This is because the alternative calls for developing the Eastgate property, which is inconsistent with current City of Bellevue zoning and land use plans. A full range of recycling services would be available to self-haulers and self-haul service would be available at all facilities during all hours of operation to support the region's recycling goal. Auburn and Algonia have also expressed concern about the 3 replacement sites being evaluated for South King County.

Formatted: Font: 11 pt

Environment

Like the Base Alternative, Alternative A includes compactors at every facility (although waste brought in by self-haulers would not be compacted at Factoria), significantly reducing the number of transfer trailer trips generating traffic and GHGs. Lacking a Northeast facility, some customers would have to travel outside their current service area, increasing the environmental impacts of customer trips compared to the Base Alternative. Impacts on streets neighboring Factoria would increase.

Risks/Challenges

Because this alternative redirects all east/northeast tonnage and customers to Factoria, it would increase any impacts in the area around that facility. Bellevue's land use code would require a conditional use permit to construct on the Eastgate property. The City of Bellevue is the permitting authority, and a conditional use permit would be inconsistent with Bellevue's recently adopted I-90 corridor plan. Without a new permit from Bellevue, this alternative could not be built.

Alternative A*

This alternative renovates and retains the current Houghton transfer station as a self-haul only facility and builds a new Factoria facility as currently designed.

- Do not build Northeast
- Build Factoria as currently designed and permitted, with phase 1 (garbage) opening in 2016, and phase 2 (recycle and HHW) opening in 2017
- Renovate Houghton and transition to self-haul only in 2017
- Close Renton in 2018 Evaluate this same alternative without the closing of Renton.

- Build a new South County recycling and transfer station to open in 2019 on one of three sites currently being evaluated
- Close the Algona transfer station in 2020, making that property available for other use

The Houghton transfer station would:

- Accept garbage and yard waste from self-haul customers 7 days a week
- Accommodate limited recycling, e.g., curbside mix OR scrap metal and appliances
- Not have a compactor
- Not provide emergency storage

The Factoria recycling and transfer station would:

- Accept garbage from commercial haulers seven days a week with extended hours on weekdays
- Accept garbage and recyclables from self-haulers on weekends and limited weekday hours, for example, 4 p.m. to 10 p.m.
- HHW service would be available 6 days a week

This option results in \$85 million savings of capital over the base plan. Storage capacity and compaction would be supported everywhere except Houghton. However, vehicle capacity at Factoria and Houghton would be exceeded for 50 percent of the operating hours, and sometimes more. The Eastgate risk is resolved but Kirkland has expressed objections to the continued operation of Houghton in its residential neighborhood. Like Alternative A, the lack of a Northeast station would also increase collection costs over the Base Alternative.

Cost

At about \$136 million (\$2013), Alternative A* falls in the middle of the capital cost range. This would translate to an added cost of about \$0.65 per month for the average household (estimated median cost of capital debt 2014-2040). The most significant change from the Base Alternative is elimination of the cost of constructing a Northeast facility. The capital cost of retaining Houghton as a self-haul facility does not significantly affect the total. As with each of the alternatives, all new facilities would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. Alternative project financing and delivery methods would be evaluated for each new station built to identify potential cost savings

Compared to Alternative A, this alternative adds self-haul service. But it does not add service for commercial haulers. Since collection costs are determined by the haulers, who would be served by the same facilities as in Alternative A, collection cost impacts in this alternative would be the same as Alternative A.

Service

This alternative meets less than half (14 out of 25) of the level of service criteria and subcriteria, because it retains the existing Houghton transfer station. Houghton is not large enough to be renovated to meet level of service standards for recycling services, emergency storage, compaction, vehicle capacity, and others, and is not compatible with surrounding residential land use. Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. Houghton has adjacent land that can be used to add some recycling and/or other services or improvements.

The Houghton transfer station currently does not meet vehicle capacity needs (LOS score D); based on projections, it would score an F (optimal operating capacity exceeded more than 50 percent of operating hours) in future years. This would be expected to have cascading effects on other criteria, including time on site and impacts on local streets. Please specify what year that it does not meet vehicle capacity needs.

Environment

This alternative includes compactors at every facility except Houghton, requiring slightly more transfer trailer trips generating traffic and GHGs compared to the Base Alternative. Lacking a Northeast facility, some customers would have to travel outside their current service area, increasing the environmental impacts of customer trips compared to the Base Alternative. Impacts on streets neighboring Factoria and Houghton would increase relative to the Base Alternative. What would it cost to add compaction in Houghton and other potentially remodeled transfer stations?

Risks/Challenges

This alternative redirects self-haul customers from the Factoria service area to Houghton during certain weekday hours; the Houghton facility would not be able to accommodate the increased vehicle traffic without resulting in back-ups and lengthy wait times during 50 percent or more of operating hours. Because Houghton is located in a residential area, hours cannot be increased to accommodate the additional traffic. Shoreline is in a residential area and has increased hours of operation why is Shoreline different than Houghton? The City of Kirkland has expressed objections to maintaining Houghton in any capacity past the currently scheduled closure date. Please disclose specific days of the week or times of the day there would be lengthy wait times and in what year would this occur.

Alternative B

In Alternative B, plans for the South County are the same as the Base Alternative. Instead of building a new Factoria facility, a larger Northeast facility is constructed to serve the current Houghton and Factoria service areas.

- Do not build new Factoria
- Increase the size and operating hours of Northeast to accommodate east/northeast tonnage and customers, opening in 2020
- Close Factoria and Houghton in 2021 Please look at this same alternative while keeping Houghton open and Renton open as these are in close proximity to the Factoria transfer station.
- Close Renton in 2018
- Build a new South County recycling and transfer station on one of three sites currently being evaluated to open in 2019
- Close the Algona transfer station in 2020, making that property available for other use
- All stations would provide pre-load compaction, three days storage capacity, self-haul service during all operating hours, and full recycling services as described in Figure 3

This alternative calls for a halt to the current Factoria project to instead build a facility in the Northeast with an expanded size (25 percent larger than the Bow Lake RTS) and longer operating hours (approximately 6:30 a.m. to 11 p.m.); this would be necessary to handle double the tonnage and traffic. It would also build a new South County station to serve alongside Bow Lake and Shoreline. These four transfer stations would offer full service recycling, self-haul service during all operating hours, emergency storage, and compaction. There are no significant concerns about tonnage or vehicle capacity with this option except to say the Northeast facility would be a busy one; siting a facility of the

necessary size that could accommodate the late operating hours would be expected to be more complicated and challenging. Capital costs would be the second highest of the alternatives at \$187 million. Collection costs would be expected to increase in the area currently served by Factoria.

Please evaluate extending hours of operation for all alternatives studied.

Cost

With capital costs equivalent to Alternative A, Alternative B saves the costs of building Factoria, except for sunk costs of about \$22 million which have already been spent on design and permitting of a Factoria station, while adding to the cost of Northeast. In total, capital costs for Alternative B are estimated at about \$187 million (\$2013). This would translate to an added cost of about \$0.90 per month for the average household (estimated median cost of capital debt 2014-2040). As with each of the alternatives, all new facilities would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. Alternative project financing and delivery methods would be evaluated for each new station built to identify potential cost savings.

The Renton Transfer Station would close under this alternative, so collection cost for residents and businesses in the Renton area would likely increase as commercial haulers are redirected to the Bow Lake and Factoria facilities. The Factoria Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Mercer Island, Bellevue, Sammamish, Issaquah, Snoqualmie, and North Bend areas would increase as commercial haulers are redirected to the Northeast and possibly Bow Lake facilities. One area hauler estimates a four to five percent increase in operational or customer costs; a second hauler estimates an increase of \$2.5 to 3.5 million per year in added driver hours and trips and an additional \$6 to 9 million in capital costs such as additional trucks. How would costs change if the Renton transfer station was kept open?

Service

This is one of only two alternatives that would meet all level of service standards. A full range of recycling services would be available to self-haulers and self-haul service would be available at all facilities during all hours of operation to support the region's recycling goal.

Although some customers (including haulers) would have to travel farther to a transfer station, once there, all customers in the system would receive a uniformly high level of service.

Environment

This alternative includes compactors at every facility, significantly reducing the number of transfer trailer trips generating traffic and GHGs. However, after Factoria closes in 2021, some customers would have to travel outside their current service area, and some transfer trailers would travel farther to disposal, increasing the environmental impacts of those trips compared to the Base Alternative. Impacts on streets neighboring the new Northeast facility would increase relative to the Base Alternative.

Risks/Challenges

This alternative redirects all east/northeast customers to a Northeast facility which has yet to be sited and would need to be significantly larger than planned in the Base Alternative. Siting challenges would be intensified due to the size increase, longer operating hours, and significant traffic increase that would be associated with redirecting all east/northeast to one facility.

Alternative C

As in Alternative B, this alternative resizes the future Northeast facility to handle all of the customers and tonnage that currently go to Factoria and Houghton. It does not create new capacity in the South County.

- Do not build new Factoria
- Increase the size and operating hours of Northeast to accommodate east/northeast tonnage and customers, opening in 2020
- Close Factoria and Houghton in 2021
- Close Renton in 2018
- Do not build South County
- Close Algona in 2018, making that property available for other use
- Limit self-haul garbage and recycling at Bow Lake to weekends and weekday-evening hours

Please evaluate this same alternative with the exception of keeping Factoria and Houghton open until 2028 and not closing Algona or Renton.

This option reduces urban transfer station locations from the five planned in the Base Alternative to three – Shoreline, Bow Lake and a large Northeast facility with expanded operating hours. Those stations would have compaction and support the need for emergency storage capacity. Customers from closed Algona and Renton stations would be redirected primarily to the Bow Lake RTS; to absorb the added traffic, self-haul, including recycling services, would need to be limited, despite the new expanded area. Because this alternative does not build a new South County or Factoria facility, the capital cost for this alternative is among the lowest. However, with this substantial reduction in the number of stations, collection costs would increase significantly in areas without a nearby facility. What specific times and year would Bow Lake need to be limited to self-haul and recycling? Bow Lake has some additional land that can be used to help provide capacity. Please study the additional Bow Lake land that is available.

Cost

Alternative C is among the lower capital cost alternatives, with an estimated capital cost of \$113 million (\$2013). This would translate to an added cost of about \$0.55 per month for the average household (estimated median cost of capital debt 2014-2040). Savings come from not building the Factoria or South County facilities. Alternative project financing and delivery methods would be evaluated for the new Northeast station to identify potential cost savings.

The Renton Transfer Station would close under this alternative, so collection costs for residents and businesses in the Renton area would likely increase as commercial haulers are redirected to the Bow Lake and Factoria facilities. Absorbing its sunk costs of about \$22 million which have already been spent on design and permitting of a Factoria station, the Factoria Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Mercer Island, Bellevue, Sammamish, Issaquah, Snoqualmie, and North Bend areas would increase as commercial haulers are redirected to the Northeast and possibly Bow Lake facilities. Under this alternative, the Algona Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Federal Way, Algona, Pacific, and Auburn areas would increase as commercial haulers are redirected to the Bow Lake and Enumclaw facilities. One area hauler estimates a four to five percent increase in operational or customer costs; a second hauler estimates an increase of \$3 to 4.5 million per year in added driver hours and trips

and an additional \$9 to 15 million in capital costs such as additional trucks. The hauler serving the South County area has expressed concern about disparate impacts in level of service related to this alternative.

Service

As with each of the alternatives, all new facilities would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. However, due to the small number of facilities, and the redirection of customers to a the Bow Lake RTS, which was not designed for such a high proportion of the system's waste, this alternative does not meet six of the 25 criteria and subcriteria. These include customer service criteria such as drive-time and critical operational standards for vehicle capacity. Without a South County station, the Bow Lake RTS is projected to exceed vehicle capacity more than 50 percent of weekend operating hours; this would be expected to have cascading effects on other criteria, including time on site and impacts on local streets. Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. What if Renton stayed open to mitigate impacts to Bow Lake?

Environment

In the east/northeast area this alternative has the same traffic and greenhouse gas impacts as Alternative B. After 2018, this alternative would not provide any transfer service in the South County service area, resulting in increased traffic and greenhouse gas emissions from customers traveling to Bow Lake or further due to limited self-haul hours at Bow Lake. Impacts on streets neighboring the new Northeast facility and Bow Lake would increase relative to the Base Alternative.

Risks/Challenges

Challenges in the east/northeast area are the same as in Alternative B; all east/northeast customers are directed to a Northeast facility which has yet to be sited. Siting challenges may be intensified due to the size increase of the Northeast station, longer operating hours, and significant traffic increase that would be associated with redirecting all east/northeast to one facility.

Additionally, this alternative would provide very limited service in the south area of the county; all south area commercial haulers would be directed to Bow Lake or Enumclaw, causing the Bow Lake RTS to limit self-haul service and exceed capacity more than 50 percent of the time on weekends, likely leading to traffic impacts on Orillia Road. What if Algona and Renton were open just on the weekends to mitigate impacts at Bow Lake?

Alternative C**

This alternative is a variation on Alternative C. It differs from Alternative C only in that it renovates and retains Algona as a self-haul only facility.

- Algona to accept garbage and yard waste from self-haul customers 7 days a week Please study this same alternative except leave Algona open to both commercial service and self-haul.
- No space for recycling any materials except yard waste at Algona. Please study how the adjacent land can be used for both yard waste and also recycling service(s). It is misleading not to disclose and study the adjacent Algona transfer station land recently purchased by King County.
- No compactor at Algona Please disclose that a compactor can be done and share the cost of this.

- No storage at Algona. Please study how the adjacent land can be used for storage of both empty and full trailers.
- Complete Algona renovation and transition to self-haul only in 2018. What would the cost to add compaction at Algona while the remodel is being completed?

This option is essentially the same as C with the addition of retaining Algona as a self-haul only facility that also accepts yard waste but no other recyclables. Vehicle capacity at Algona would be exceeded up to 50 percent of the time with traffic queuing onto West Valley Highway. In what year would vehicles exceed capacity 50% of the time? The capital costs for this option increase to \$122 million in order to make necessary repairs at Algona. Since only self-haul is added in this approach compared to Alternative C, we still expect collection costs to rise in areas without a nearby facility as a result of the substantial reduction in the number of transfer stations. How would Algona wait times change if Renton was left open? How would Algona wait times change if Peirce County users were restricted or discouraged from using Algona? What if hours of operation were extended in Algona?

Cost

At \$122 million (\$2013), this alternative is in the middle of the capital cost range. This would translate to an added cost of about \$0.60 per month for the average household (estimated median cost of capital debt 2014-2040). It adds to the cost of Alternative C because it requires renovation of the current Algona transfer station, which has significant deficiencies. Alternative project financing and delivery methods would be evaluated for the new Northeast station to identify potential cost savings. Compared to Alternative C, this alternative adds self-haul service, but does not add service for commercial haulers, so collection cost impacts would be the same as Alternative C.

Service

This alternative does meet the drive time standard (in contrast to Alternative C). Please specify the details of not meeting the drive time standard. For what % of the service area is this the case for? Are current rural drop boxes included in reaching this conclusion? As with each of the alternatives, all new facilities would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. However, due to the small number of facilities, the redirection of commercial customers to a facility that was not designed for such a high proportion of the system's waste, and the continued use of a facility that is already over fifty years old, it fails to meet 12 of the 25 criteria and subcriteria. Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. It also fails to meet critical operational standards for vehicle capacity. Criteria relating to station capacity are critical from an operational perspective, and can have cascading effects on other criteria. Failing vehicle capacity standards means that the system will be unable to accommodate vehicles traffic for at least 10 percent of operating hours.

Environment

Greenhouse gas emissions and traffic would be somewhat lessened in the south area with availability of self-haul service at Algona; however, with additional self-haul traffic directed to Algona during the hours when Bow Lake would be closed to self-haul, Algona will experience traffic impacts. All commercial haulers would still be directed to other facilities, which would primarily affect the area surrounding Bow Lake.

Risks/Challenges

Challenges in the east/northeast area are the same as in Alternatives B and C; all east/northeast customers are directed to a Northeast facility which has yet to be sited. Siting challenges may be intensified due to this significant traffic increase and the fact that this would be the largest facility in the system, with extended operating hours. This alternative would redirect a significant portion of self-haul customers from the Bow Lake service area to Algona, causing customer queues to spill onto West Valley Highway at times. This alternative would redirect all south area commercial haulers to Bow Lake or Enumclaw. How can the adjacent land in Algona be used to keep traffic off West Valley Highway? What is Renton is open all the time or only at peak periods?

Alternative D

This alternative avoids siting any new facilities. Instead, all east and northeast traffic and tonnage are directed to an expanded Factoria, while all south county tonnage and traffic are directed to Bow Lake.

Please study this same alternative with a resized Factoria except do not close any of the other transfer stations. Keep the other transfer stations open and remodel them if necessary.

- Do not build Northeast
- Resize Factoria to accommodate an expanded service area, which requires use of the Eastgate property, opening in 2020/2021
- Close Houghton in 2021
- Close Renton in 2018
- Do not build the South County station
- Close Algona in 2018, making that property available for other use
- Limit self-haul garbage and recycling at Bow Lake to weekends and reduced weekday hours

This option reduces our current urban transfer station locations from six to three. Those stations would have compaction and support the need for emergency storage capacity. Recycling programs would also be in place at two of the three locations on a full-time basis with part-time services at the third. As a result of eliminating transfer stations in the South and Northeast County, capital costs would be reduced by \$108 million. This alternative assumes that we would build a new Factoria but it requires expansion onto the upper property known as the Eastgate. Bellevue has expressed concern in regards to zoning conflicts. As tonnage from Algona and Renton is diverted to Bow Lake, we would exceed vehicle capacity more than 50 percent of the time. Self-haul services would be significantly limited at Bow Lake to accommodate the additional commercial traffic. Additionally, eliminating facilities in the South and Northeast County needs to be reconciled with the fact that these locations within King County are forecasted to experience the largest population growth in the next 20 years. Finally, with this substantial reduction in stations, collection costs would very likely increase across the county, but particularly in Northeast and South County areas.

Tonnage in the system doesn't seem to be the issue. Please study how the limited use of all current stations can be done to meet specific vehicle demands or haul costs.

Cost

Alternative D has roughly the same capital cost as Alternative C, estimated at \$112 million (\$2013); this would translate to an added cost of about \$0.55 per month for the average household (estimated median cost of capital debt 2014-2040). Despite increasing the cost of Factoria compared to the Base Alternative, this alternative does not build any other new facilities.

The Renton Transfer Station would close under this alternative, so collection costs for residents and businesses in the Renton area would increase as commercial haulers are redirected to the Bow Lake and Factoria facilities. The Houghton Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Bothell, Woodinville, Kirkland, Redmond, Duvall, and Carnation areas would increase as commercial haulers are redirected to the Factoria and Shoreline facilities. Cost may also increase for customers in Lake Forest Park and Kenmore, because although the Shoreline station is nearby, the hauler serving this area is currently using the Houghton transfer station for end-of-day trips based on proximity to their base location. Under this alternative, the Algona Transfer Station would close and a replacement facility in the service area would not be built, so collection costs for residents and businesses in the Federal Way, Algona, Pacific, and Auburn areas would increase as commercial haulers are redirected to the Bow Lake and Enumclaw facilities. One area hauler estimates a 2 to 3 percent increase in operational or customer costs; a second hauler estimates an increase of \$2 to 3.5 million per year in added driver hours and trips and an additional \$9 to 15 million in capital costs such as additional trucks. The hauler serving the south county area has expressed concern about disparate impacts in level of service related to this alternative.

How would costs change under this alternative if Renton, Algona and Houghton transfer stations were left open to commercial service?

Service

This alternative fails to meet six of the 25 criteria and subcriteria. These failures include drive time, recycling services, vehicle capacity standards, (please provide specifics on what year failure occurs) and, because it requires use of the Eastgate property, compatibility with surrounding land use. Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. Criteria relating to station capacity are critical from an operational perspective, and can have cascading effects on other criteria. Failing vehicle capacity standards means that the system will be unable to accommodate vehicles traffic for at least 10 percent of operating hours. A failure for at least 10% of the operating hours is too restrictive to define as failure. Please modify this criteria and the definitions used.

Environment

Lacking a Northeast and a South County facility, some customers would have to travel outside their current service area, increasing the environmental impacts of customer trips compared to the Base Alternative. Impacts on streets neighboring Factoria and Bow Lake would increase compared to the Base Alternative. How would the proximity of Seattle's, Snohomish County and Pierce County's transfer stations help mitigate impacts under this alternative?

Risks/Challenges

Challenges for the east/northeast are the same as in Alternative A; Bellevue's land use code would require a conditional use permit to construct on the Eastgate property. This decision, which is inconsistent with Bellevue's recently adopted I-90 corridor plan, would be made by the City of Bellevue. Because this alternative redirects all east/northeast tonnage and customers to Factoria, it would amplify any impacts in the area around that facility. Without a new permit from Bellevue, this alternative could not be built.

Challenges for the south area are the same as Alternative C; this alternative would provide very limited service in the south area of the county. This alternative would limit self-haul service and redirect all

south area commercial haulers to Bow Lake or Enumclaw. Please provide more information on the capacity and services available in Enumclaw.

Alternative D**

This alternative differs from Alternative D only in that it renovates and retains Algona as a self-haul only facility.

- Algona to accept garbage and yard waste from self-haul customers 7 days a week
- No space for additional recycling at Algona. This statement is very misleading and not true because King County owns additional land adjacent to the current Algona transfer station.
- No compactor at Algona. Please disclose the cost to add compaction at the same time as remodel. Compaction maneuvering area can be done in less than 200 lineal feet. Most trucking facilities do not operate with 200 lineal feet of maneuverability but closer to 100 lineal feet.
- No storage at Algona. Please study how the additional Algona land can be used for empty and full transfer trailers.
- Algona renovation complete and transition to self-haul only in 2018 Please study how changes to the remodel of Algona can be made to increase compliance with criteria and how the adjacent land can be incorporated.

This option is essentially the same as D with the addition of retaining Algona as a self-haul only facility that also accepts yard waste but no other recyclables. (Yard waste can be accepted by the current landscape supply company that King County leases to. By having yard waste accepted on the adjacent property, the Algona transfer station could keep commercial service open or provide two lanes of self-haul service. However, given the limited footprint, we would still exceed vehicle capacity up to 50 percent of the time at Algona with traffic queuing onto West Valley Highway. The capital costs for this option increase to \$120 million in order to make necessary repairs at Algona. Collection costs are still likely to increase across the county as a result of the limited locations for commercial drops, particularly in Northeast and South County areas.

Cost

Capital costs for this alternative fall in the middle of the range, at about \$121 million (\$2013). This is roughly the same cost as Alternative C**. Most of the cost of Alternative D** is the construction of Factoria. This would translate to an added cost of about \$0.60 per month for the average household (estimated median cost of capital debt 2014-2040).

This alternative adds self-haul service, but does not add service for commercial haulers, so collection cost impacts would be the same as Alternative D.

Service

Although this alternative does meet the drive time standard in contrast to Alternatives C and D, it fails to meet 13 of the 25 criteria and subcriteria. These failures include recycling services, vehicle capacity, and impacts to local streets. Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. Criteria relating to station capacity are critical from an operational perspective, and can have cascading effects on other criteria. Failing vehicle capacity standards means that the system will be unable to accommodate vehicles traffic for at least 10 percent of operating hours.

Please study the option of Algona having both commercial and self-haul remain.

Please study the option of two lanes of self-haul being provided in Algona.

Please study how the adjacent King County owned land in Algona can be used to help minimize traffic impacts to local streets.

Please study how the adjacent Algona land can be used to provide recycling and yard waste services.

Environment

Greenhouse gas emissions and traffic would be somewhat lessened in the south area with availability of self-haul service at Algona; however, that would direct additional self-haul traffic to Algona during the week when Bow Lake's self-haul hours would be limited, impacting traffic around Algona and causing queues to spill onto West Valley Highway. All commercial haulers would still be directed to other facilities, which would primarily affect the area surrounding Bow Lake. How would impact change if the Renton Transfer Station were to remain open?

At what point would customers and haulers start taking advantage of the extra capacity in Enumclaw?

Please study customer and hauler behavior with drive times and wait times.

Risks/Challenges

Challenges in the east/northeast area are the same as in Alternatives A and D; Bellevue's land use code would require a conditional use permit to construct on the Eastgate property. This decision, which is inconsistent with Bellevue's recently adopted I-90 corridor plan, would be made by the City of Bellevue. Because this alternative redirects all east/northeast tonnage and customers to Factoria, it would amplify any impacts in the area around that facility. Without a new permit from Bellevue, this alternative could not be built.

Challenges for the south area are the same as Alternatives C and D; this alternative would provide very limited service in the south area of the county; a significant portion of self-haul customers from the Bow Lake service area would be redirected to Algona, and all south area commercial haulers would be directed to Bow Lake or Enumclaw.

Alternative D***

Combines D** (which does not site any new facilities and retains Algona as a self-haul facility) with A* (which retains Houghton as a self-haul facility).

- Retain Algona and Houghton as self-haul only stations What if these stations had two lanes of self haul with no yard waste being handled in the transfer building? Yard waste for these stations can be handled in the additional adjacent and already owned King County land.
- Do not build Northeast or South County
- Build and operate an expanded Factoria as described in Alternative A*
- Close Renton in 2018 Please study this same alternative with Renton staying open.
- Limit self-haul garbage and recycling at Bow Lake to weekends and reduced weekday hours

This option still does not build in Northeast or South County but instead of building an expanded Factoria using the Eastgate property, we would build Factoria as designed. Additionally, we would retain both Algona and Houghton as self-haul only facilities. Consequently, this option has the lowest of all capital costs at \$71 million. However, at Factoria, Houghton, and Algona (3 of the five stations) we would exceed vehicle capacity up to 50 percent of the time, and at Houghton even more. Adjacent land already owned by King County at these three locations can be used to help handle vehicle capacity. Vehicle queuing and/or scale stations can be improved using additional land and technology. This approach does address the probable risks associated with developing the Eastgate property in Bellevue

but requires the Houghton station to remain open. Collection costs are still likely to increase across the county as a result of the limited locations for commercial drops, particularly in Northeast and South County areas.

Since the 2006 Transfer Station Study, King County purchased land in Algona adjacent to the current Algona Transfer Station. This adjacent land was purchased in 2012. Why is King County Solid Waste not studying the option of using this adjacent land. It appears irresponsible not to include this land in the studies.

Cost

Constructing only one new facility (Factoria), Alternative D*** has the lowest capital cost of all nine alternatives, estimated at \$71 million (\$2013); this would translate to an added cost of about \$0.35 per month for the average household (estimated median cost of capital debt 2014-2040).

This alternative adds self-haul service, but does not add service for commercial haulers, so collection cost impacts would be the same as Alternative D. Commercial service can be kept at locations and Renton can remain open to help reduce costs.

Service

Largely because Algona and Houghton have many limitations that cannot be overcome by renovation, this alternative does not meet 14 of the 25 criteria and subcriteria. How can the additional land at these locations be used to meet additional criteria. It fails to meet the same criteria as D**, including include recycling services, vehicle capacity, and impacts to local streets. Because the Houghton transfer station is located in a residential neighborhood, it also fails the criterion "100 foot buffer between active area and nearest residence." Transfer station recycling services under this alternative do not meet the LOS standard and will not fully support meeting our regional recycling goal. How can adjacent land help with recycling? Criteria relating to station capacity are critical from an operational perspective, and can have cascading effects on other criteria. Failing vehicle capacity standards means that the system will be unable to accommodate vehicles traffic for at least 10 percent of operating hours. If operating hours are extended, this will help reduce vehicle capacity failure from happening at least 10% of the time. Please explore extending operating hours in this report.

Environment

This alternative somewhat mitigates the impacts of longer distances by maintaining self-haul service at Algona and Houghton; however, impacts to streets surrounding those facilities would increase. How could currently owned adjacent land be used to help mitigate impacts to streets?

Please study the option of street improvements to West Valley Highway in Algona. Designated turn lanes could be added to West Valley Highway.

Please study how access to Algona can be changed whereby vehicles enter the Algona Transfer Station as far north as Iowa Drive. Vehicles can be given a large area to queue that is off the surrounding streets.

Please study moving the current transfer trailer storage in Algona to the adjacent property already owned by King County. This will help create additional queuing area and thereby reducing impacts to

Risks/Challenges

This alternative redirects self-haul traffic to very constrained facilities.

Bellevue's land use code would require a conditional use permit to construct on the Eastgate property. This decision, which is inconsistent with Bellevue's recently adopted I-90 corridor plan, would be made by the City of Bellevue. Because this alternative redirects all east/northeast tonnage and customers to Factoria, it would amplify any impacts in the area around that facility. Without a new permit from Bellevue, this alternative could not be built.

All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirements.

Haulers' Collection Cost

All three commercial hauling companies serving the areas affected by the Transfer Plan provided preliminary estimates of impacts to their costs, which would be passed on to collection customers.

Although each of the haulers presented their cost estimates in a different format, (different formats create confusion and please correct this) all noted that these estimates are rough (rough estimates are not appropriate in a study that will determine a transfer plan that will spend as much as \$200+ Million.).

According to one hauler, "A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast county transfer stations. Consideration of these variables may significantly affect the cost estimates." (Please note and take action on the hauler's concern.) A summary of these estimates is presented in Table 5. The complete information submitted by the haulers is available in Appendix B.

Table 5 – Collection Cost Estimates Summary

This collection cost summary is confusing.

Please provide collection cost data impacts for each city in King County.

	CleanScapes	Republic	Waste Management
Base		Minimal impact in drive time or costs. Less than a 1% increase in operational or customer costs.	Expenses (Driver Hours & Trips) \$1 - 2 million/yr Capital Cost \$3 - 6 million
A		Minimal impact in drive time or costs. Less than a 1% increase in operational or customer costs.	Expenses (Driver Hours & Trips) \$1.5 – 2.5 million/yr Capital Cost \$6 - 9 million
A*		Minimal impact in drive time or costs. Less than a 1% increase in operational or customer costs.	Expenses (Driver Hours & Trips) \$1.5 – 2.5 million/yr Capital Cost \$6 - 9 million
B	30 hours/week (truck and labor) or \$3,000/week	Drive time increased by 300 hours per month. Increase in customers rates 4-5%.	Expenses (Driver Hours & Trips) \$2.5 – 3.5 million/yr Capital Cost \$6 - 9 million
C	30 hours/week (truck and labor) or \$3,000/week	Drive time increased by 350 hours per month. Increase in customers rates 4-5%.	Expenses (Driver Hours & Trips) \$3 – 4.5 million/yr Capital Cost \$9 - 15 million
C**	30 hours/week (truck and labor) or \$3,000/week	Drive time increased by 350 hours per month. Increase in customers rates 4-5%.	Expenses (Driver Hours & Trips) \$3 – 4.5 million/yr Capital Cost \$9 - 15 million
D		Drive time increased by 100 hours per month. Increase in customer rates possible 2-3%.	Expenses (Driver Hours & Trips) \$2 – 3.5 million/yr Capital Cost \$9 - 15 million
D**		Drive time increased by 100 hours per month. Increase in customer rates possible 2-3%.	Expenses (Driver Hours & Trips) \$2 – 3.5 million/yr Capital Cost \$9 - 15 million
D***		Drive time increased by 100 hours per month. Increase in customer rates possible 2-3%.	Expenses (Driver Hours & Trips) \$2 – 3.5 million/yr Capital Cost \$9 - 15 million

Regional Direct Rate

Under the King County Code, the County charges a lower rate if solid waste companies process waste at their own private transfer stations and haul it in transfer trailers directly to Cedar Hills. The rate reflects the County's avoided costs since the regional direct waste does not pass through the County's transfer system. In the past, for many years, the regional direct rate was significantly lower than the County's actual avoided costs, which created a financial incentive for private collections companies to bypass County transfer stations. (a financial incentive is good for haulers to avoid using the King County Transfer Stations because it reduces the need to have new and/or larger transfer stations. Please study what would change in the alternatives if a lower regional direct rates was reintroduced.) In 2003, the County eliminated public subsidies to private industry by adjusting the regional direct rate paid by haulers for waste brought directly to Cedar Hills when the Council passed Ordinance 14811 to increase the Regional Direct rate to cover the County's costs.

One question that arose during the review of the Plan was whether a subsidy could be reinstated to create sufficient financial incentive to the private sector to use private transfer stations and eliminate the need for King County to build a facility to replace the Houghton Transfer Station. However, based on an analysis of tonnage distribution over the past 15 years, a change in the regional direct rate would have virtually no effect on County transfer station capacity needs in the Northeast service area. How would a change in the regional direct rate impact transfer station capacity in South King County? This concern was also brought up in the review of the Plan. Please provide equity to South King County in your review of this possibility.

The increase in the regional direct rate virtually eliminated regional direct tonnage, which decreased from about 24 percent of total tonnage to about 1 percent since the fee was increased in 2004. During the past decade, the private transfer stations that previously handled regional direct waste have all been repurposed to serve other functions. These private transfer stations could be changed again or new ones developed. Regional direct is still a viable alternative and please further study this in your report.

Despite the significant change in total regional direct tonnage, the Houghton tonnage did not change after the regional direct fee was increased. From 1999 to 2013 the Houghton transfer station received between 17 and 19 percent of the annual total system tonnage. Data show that the tonnage haulers used to deliver directly to Cedar Hills now goes primarily to Bow Lake, with smaller amounts also going to Algona, Factoria and Renton.

The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was effective. Direct haul can extend the life of existing transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.

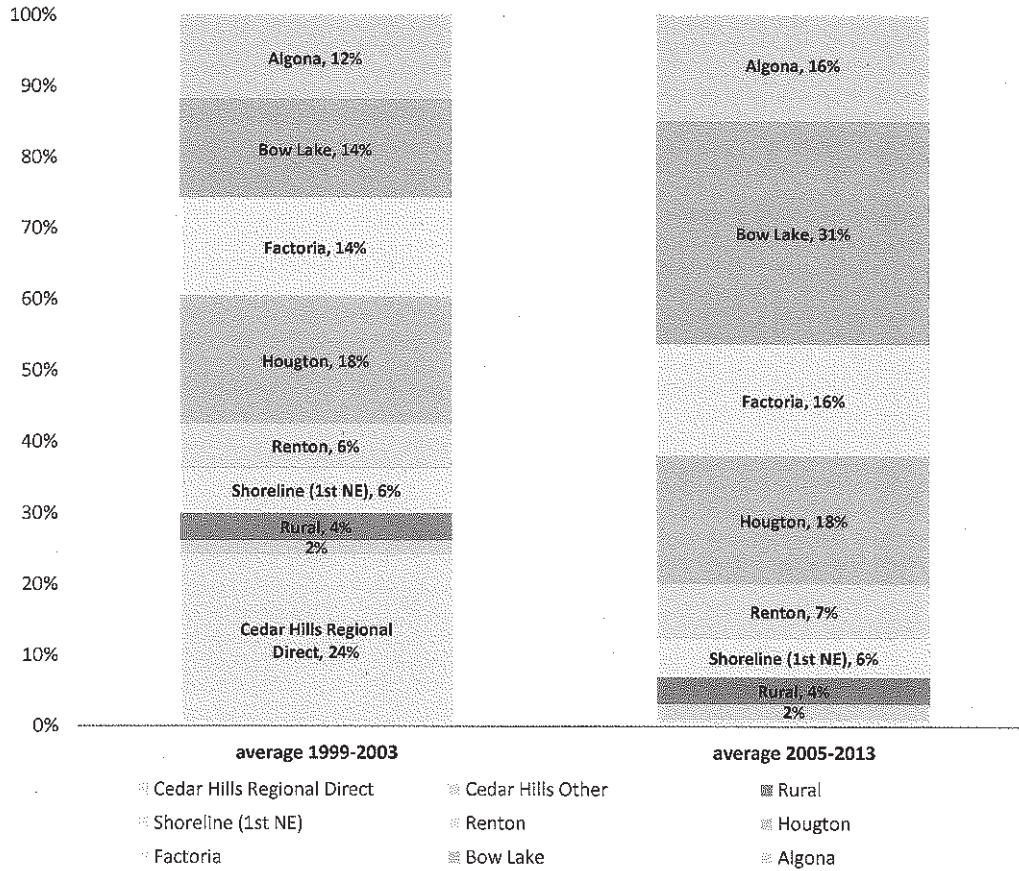
Formatted: Font: 11 pt

Please study the costs and benefits of direct haul to Cedar Hills and/or another transfer station during the period of construction of a transfer station verses keeping the transfer station open during construction.

Please study the costs and benefits of using Cedar Hills for limited peak periods and in the event of emergencies or service disruptions to a transfer station.

Formatted: Font: 11 pt

Figure 4: Waste Disposed by Facility
Percentage of total system tons before and after regional direct fee change (May 2004)



The above graphs demonstrate that regional direct to Cedar Hills Landfill will drastically impact future needs and capacity for transfer stations. Please incorporate regional direct into several of the alternatives that are being studied.

Recommendation

Why are there no policy changes, incentive ideas, rate adjustments, incorporation of 3rd party recommendations or new ideas presented in King County Solid Waste's report? Numerous excellent ideas could be incorporated into this report which would change future transfer station requirements.

Formatted: Superscript

This review was undertaken to answer two primary questions:

1. Are changes to Transfer Plan needed to ensure that the transfer system is sized and configured appropriately to meet the region's solid waste needs now and for the long term? The long term issue of Cedar Hills Landfill capacity constraints, potential impacts of policy changes and zero waste initiative goals have largely been skimmed over and not appropriately studied in this report.
2. Could changes be made that could reduce future expenditures while still meeting desired service levels and objectives? This has not been fully achieved in this report. Other alternatives warrant study and inclusion in this report.

To answer the first question, the division, in collaboration with stakeholders, examined the Base Alternative; four alternatives that did not build one or more of the planned new facilities; and four variations on those alternatives that retained for self-haul service one or more of the existing facilities currently planned for closure. Collaboration was limited because of time constraints and King County Solid Waste's control of information, the process and alternatives.

The analysis revealed that any system configuration which does not build a new South County Recycling and Transfer Station to replace Algona (Alternatives C, C**, D, D**, and D***) will not provide sufficient service and would result in significantly increased collection costs for residents and businesses in the South County. These alternatives would overload the Bow Lake Recycling and Transfer Station (RTS), which was not designed to handle such a high proportion of the system's customers and would not adequately serve the South County, raising collection costs in the county's lowest income area. This study arrives at an improper conclusion for multiple reasons including the fact that Algona has adjacent land already owned by King County that needs to be incorporated into the study. Further, the existing Renton Transfer Station could remain open to help adequately serve South King County. One or more changes in the alternatives could result in a different conclusion. A 3rd party audit of the report should be done to reveal any other considerations, alternatives or changes that should be made to this report.

Formatted: Superscript

The remaining alternatives (A, A*, and B) each have unique merits and demerits. Alternative A relies on an expanded Factoria RTS, which would require a conditional use permit to construct on the Eastgate property. The City of Bellevue is the permitting authority, and a conditional use permit would be inconsistent with Bellevue's land use code and recently adopted I-90 corridor plan. Bellevue has been an active participant in this review process and has clearly indicated that it is unlikely to permit development of the Eastgate property for use as a transfer station. Please mention that this the South King County cities of Algona and Auburn have the same permitting risks and concerns as Bellevue. Please provide equity in this report by mentioning the same risks and concerns. Algona and Auburn are the identified cities in the EIS for the 3 South King County sites. Alternative A would also redirect the majority of the customers currently using the Houghton transfer station to Factoria, resulting in

increased traffic at Factoria and higher collection costs for the current Houghton service area. The areas currently served by the Algona and Houghton Transfer Stations (the South County and Northeast County service areas) are forecast to experience heavy population growth by 2035. Why have you selected the year 2035? Please provide population and density information in the body of this report.

What specific amount of South King County population growth will be within a 30 minute drive time of the current Enumclaw Transfer Station?

Alternative A* uses the current Factoria design and permits, but retains the Houghton transfer station for self-haul, thus resolving the Eastgate risk. But Kirkland has expressed objections to the continued operation of Houghton in its residential neighborhood. Additionally, the Houghton transfer station currently does not meet vehicle capacity needs, a situation which would intensify in future years, despite removing commercial traffic from the facility. The Shoreline Transfer Station has adjacent homes and parks. Why is Houghton being given preferential treatment because of residences?

This leaves the Base Alternative and Alternative B as the only system configurations that reliably provide sufficient capacity to handle forecast vehicle traffic. The Base Alternative has the highest capital costs and lowest collection costs of all the alternatives. The Base Alternative's capital costs are about 15 cents more per month for the average household (estimated median cost of capital debt 2014-2040) than Alternative B. Alternative B will result in higher collection costs for customers currently being served by the Factoria Transfer Station. Other viable solutions exist whereby capacity is able to handle forecasted vehicle traffic.

Both alternatives require siting of two new facilities, which poses a risk. However, the risk involved in siting an expanded Northeast RTS, as called for in Alternative B, which is necessary to accommodate customers currently served by the Houghton and Factoria transfer stations, is significantly greater. With a transfer building of approximately 87,000 square feet (about 25 percent bigger than the Bow Lake RTS which sits on 20 acres) the new Northeast RTS would be the largest facility in the system and would require extended operating hours. Finding an appropriate site for such a large facility, with extended operating hours and significant traffic, poses such a significant risk that the alternative could be unfeasible. While both the Base Alternative and Alternative B could meet the region's solid waste needs now and for the long term, the difference in cost between them is not pronounced and the Base Plan offers significantly less risk in the already challenging siting process. The Renton Transfer Station has recycling and also the ability to expand on adjacent vacant land. Why are we not considering alternatives that keep Renton open?

The division must continue monitoring critical factors such as tonnage, the economy, and population growth. Therefore, to reduce future expenditures while still meeting desired service levels and objectives, it is critical to consider the timing, sizing and possibly phasing of services of each new facility. Each new station would be subjected to value engineering and sized according to the most current tonnage forecasts for the area the facility would serve. Alternative project financing and delivery methods would be evaluated for each new station to identify potential cost savings. King County Solid Waste has options available to meet demand for years to come while at the same time limiting capital expenditures. Waiting to build new transfer stations will allow future transfer stations the ability to be different if need be to meet future changes in waste handling, recycling and technology. Shoreline, Bow Lake and possibly Factoria are newer stations and we can wait to build the next generation of transfer stations in the Northeast and South County and in doing so the next generation of transfer stations will likely be superior.

Based on analysis of the alternatives and preliminary stakeholder feedback, the Division recommends proceeding with a variation of the Base Alternative which would include deferring the opening date of the new Northeast transfer station so that the Division can assess the timing and potential phasing of the new station. This recommendation would proceed with construction of the new Factoria station as currently designed, while studying whether additional space and services could be added to the new Factoria station that could affect a new Northeast station. With flexibility in the timing and scope of a new Northeast facility, the division would also evaluate options to further mitigate impacts on the Houghton neighborhood. Mitigation could include closing Houghton to commercial traffic between opening the new Factoria and final closure of Houghton. The project to site a new facility in the south county to replace the Algona Transfer Station would continue as scheduled. This variation on the Base Alternative recognizes the value of a regional system that provides equivalent services to all system ratepayers. Why has the division not presented other variations to alternatives and only one variation to the Base Alternative? Stakeholders want to be presented with other options that meet or come closer to meeting forecasts.

Other solutions and alternatives exist whereby the Algona Transfer Station is not replaced and South King County would still have equivalent services as other parts of the County.

How are the specific justifications for phasing different in the South King County from the North King County? South King County already has Bow Lake, Renton, Algona, Enumclaw, Cedar Falls Dropbox and Cedar Hills Landfill how is phasing and waiting to build in North King County so very different than waiting to build in South King County?

Be reasonable. Do not overbuild. Listen to the communities. Be innovative. Solid Waste is jamming new transfer stations down the public's throat at their expense. If a transfer station is overbuilt it is a waste to rate payers. Solid waste transfer and waste management is an important issue, but if not done correctly mistakes are very costly. A careful and timely consideration of these alternatives by decision makers will be needed as part of the transfer system plan.

Formatted: Font: 11 pt
Formatted: Space After: 0 pt

Please attach the HERRERA Optimized Transfer Station Recycling Feasibility Study done in July 2013 to this report in both the Appendices and also in the body of the report under recycling and other sections.

As the County proceeds to modernize its transfer system with the siting, design, and construction of new facilities, and the updating or moth-balling of others, stark choices exist: • What is an appropriate level of recycling to accomplish at existing and new facilities?

- Should the County do material processing itself to accomplish its Zero Waste goals? At what level?
- What type of partnership should the County have with the private sector?
- What is the best mix of facilities (and where should they be) to maximize diversion efficiently?

Formatted: Space After: 0 pt

Appendices

Appendix A: Stakeholder Involvement

Workshop 1

Meeting Agenda

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-1-Agenda.pdf>

Workshop 1 Summary

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-1-Meeting-Summary.pdf>

Workshop 1 Supplemental Information

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-1-Supplemental-Information.pdf>

Workshop 2

Meeting Agenda

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-2-Agenda.pdf>

Workshop 2 Summary

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-2-Meeting-Summary.pdf>

Workshop 3

Meeting Agenda

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-3-Agenda.pdf>

Workshop 3 Summary

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Workshop-3-Meeting-Summary.pdf>

Additional Presentations

[RPC \(August\)](#)

[RPC \(September\)](#)

[SCA PIC \(August\)](#)

[SCA PIC \(September\)](#)

[MSWMAC \(August\)](#)

[MSWMAC \(September\)](#)

[City Managers \(September\)](#)

[City Managers \(October\)](#)

Appendix B: Cost Data

B.1 Forecasting Garbage Tonnage

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Forecasting-Garbage-Disposal.pdf>

B.2 Retention and Repair Costs for Existing Station

http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Retention-Repair-Costs_Existing-Transfer-Stations.pdf

B.3 Transfer Station Cost Drivers

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Transfer-Station-Cost-Drivers.pdf>

B.4 Collection Cost Information Provided by the Haulers

Cleanscapes

From: Signe Gilson [<mailto:Signe.Gilson@cleanscapes.com>]
Sent: Tuesday, August 13, 2013 5:38 PM
To: Gaisford, Jeff
Cc: Husband, Chris; Reed, Bill
Subject: RE: Request for input in King County Transfer Plan Review

Thanks, Jeff

The main impact to CleanScapes would be on our trips between Issaquah and the Factoria Transfer Station (Alts B and C). Depending on where exactly the NE station would be located, our trips between Carnation and the transfer station could also be affected.

For purposes of analysis, we assumed a NE Transfer Station location at Avondale Rd and NE 133rd St and compared current travel times and distance (Issaquah/Factoria and Carnation/Factoria) with estimated travel times between the NE Transfer Station and Issaquah and Carnation.

Our rough estimate of implementing Alts B or C on our operations is an additional 30 hours/week (truck and labor) or \$3,000/week.

I'll be out of the office until August 28 but feel free to call with questions/clarification after that.

Thanks. –Signe.

Signe Gilson

Waste Zero Manager

CleanScapes, a Recology Company | 117 S Main Street, Suite 300 | Seattle, WA 98104

M: (206) 859-6700 | T: (206) 859-6706 | C: (206) 919-7889 | F: (206) 859-6701

signe.gilson@cleanscapes.com

Republic

Republic Services has reviewed the 5 plans proposed for the King County Transfer Stations. Below is our estimated impact for each plan based on our current customer base in order of Republic Services preference.

Our estimates are assuming no excess wait times at the stations in any of the plans. Republic will need to review all city contracts to determine if the contracts allow customer rate increases for additional drive or wait time at King County Transfer Stations.

1. **Plan-Base:** Minimal impact in drive time or costs. Less than a 1% increase in operational or customer costs.

2. **Plan-A:** Minimal impact in drive time or costs. Less than a 1% increase in operational or customer costs.
3. **Plan-D:** Drive time increased by 100 hours per month. Increase in customer rates possible 2-3%.
4. **Plan-B:** Drive time increased by 300 hours per month. Increase in customer rates 4-5%.
5. **Plan-C:** Drive time increased by 350 hours per month. Increase in customer rates 4-5%.

Republic strongly urges the County to continue toward the Base Plan.

Waste Management

From: Shanley, Kimberly [<mailto:kshanle1@wm.com>]
Sent: Monday, September 23, 2013 2:10 PM
To: Reed, Bill
Cc: Severn, Thea
Subject: RE: Estimated Collection Costs - King County's Transfer Plan Review

Hi Bill & Thea,

A correction to below... the amortization period used for our trucks is an eight to ten year period (rather than seven to ten). As to the second question, Mike Weinstein should be able to give a broad sense of the apportionment of costs to be used for residential. He is scheduled to be back in the office tomorrow, and I hope to get an answer to that question for you.

Kim Kaminski (formerly Shanley)
Government Affairs, Pacific NW/British Columbia
kshanle1@wm.com

Waste Management
720 4th Ave, Ste 400
Kirkland, WA 98033
Tel 425 814 7841
Cell 425 293 9352

From: Shanley, Kimberly
Sent: Friday, September 20, 2013 7:54 AM
To: Reed, Bill
Cc: Severn, Thea
Subject: RE: Estimated Collection Costs - King County's Transfer Plan Review

I don't think we will have a problem answering the questions (I hope!). As to the first question, I believe that our amortization period for our trucks is either over a seven or ten year interval. I will check on this. As to the third question, yes, capital costs are strictly new trucks that would be needed to cover additional routes, being that we would have to break up routes given longer drive times to facilities.

Just the closure of Houghton and Renton, which of course is in all scenarios, has an impact on our routes for North Sound and Seattle, respectively, which is the reason you see expenses and capital costs in all alternatives including the base (even though an indeterminate NE facility will be built and new Factoria will be built).

Kim Kaminski (formerly Shanley)
Government Affairs, Pacific NW/British Columbia
kshanie1@wm.com

Waste Management
720 4th Ave, Ste 400
Kirkland, WA 98033
Tel 425 814 7841
Cell 425 293 9352

From: Reed, Bill [Bill.Reed@kingcounty.gov]
Sent: Thursday, September 19, 2013 12:50 PM
To: Shanley, Kimberly
Cc: Severn, Thea
Subject: FW: Estimated Collection Costs - King County's Transfer Plan Review

Hi, Kim.

Thank you so much for your response. In addition to the cost information, the comments you provided are very helpful.

We have a few questions about the costs that we're hoping you can help us with.

- Do you have any suggestions about the amortization period we should assume for the capital costs? We need to annualize the capital costs as well as the operating costs.
- One of the questions that we have specifically been asked to address is cost per household (i.e., the average household's monthly bill will go up from \$x.xx to \$y.yy.) Kerry Knight provides us residential customer counts by container size, and by using WUTC garbage rates, we have been able to come up with a reasonable estimate of current average residential household garbage bills. Can you offer any suggestions about how to determine the percentage of the costs you provided to apportion to the residential sector? Would the percentage of garbage tons be a reasonable proxy for the percentage of expenses/capital costs?
- We presume that the capital costs are primarily trucks needed for re-routing, and we suspect that many stakeholders have not considered this potential cost. Could you please provide us with a brief explanation of what these costs are for and why they are anticipated.

Thanks again for your assistance.

Bill Reed
(206) 296-4402

From: Shanley, Kimberly [<mailto:kshanie1@wm.com>]
Sent: Thursday, September 19, 2013 8:01 AM
To: Reed, Bill; Severn, Thea
Subject: Estimated Collection Costs - King County's Transfer Plan Review

Bill and Thea,

As requested by King County, we are providing estimates of collection cost increases and related hauler-specific capital expenditures for each of the County's proposed transfer station network alternatives. We must stress that these are only rough projections based on the limited information available currently. A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates listed below.

The decisions made by the County will have resounding impacts on the regional solid waste system and individual municipalities for decades. Accordingly, a thorough and measured review is very important. As this review process is currently planned, only three months will be devoted to discussion before critical choices are rendered. In past reviews and studies, such as the Transfer Plan Review in 2006 and the Independent, Third Party Review in 2007, a comprehensive assessment of the regional system was conducted. We are concerned about potential unintended consequences associated with a rushed process. Thus, we recommend a cautious approach coupled with careful analysis.

We believe many of these options, particularly Alternatives C and D, will result in disparate impacts for many communities in both level of service and the amount of risk exposure including environmental repercussions. At the last workshop, there was essentially no support for either of these options. Hence, at the very least, Alternative C and D and their sub-alternatives should be taken off the table for discussion resulting in a streamlined focus on more viable alternatives.

Alternative Scenarios	Alternative Description	Expenses (Driver Hours & Trips)	Capital Costs
Base	Northeast & South County Built; Build New Factoria; Houghton Closed	\$1 - 2 million/yr	\$3 - 6 million
A	Northeast Not Built; South County Built; Factoria Expanded; Houghton Closed	\$1.5 - 2.5 million/yr	\$6 - 9 million
A*	Northeast Not Built; South County Built; Build New Factoria; Houghton Self Haul only	\$1.5 - 2.5 million/yr	\$6 - 9 million
B	Northeast and South County Built; Factoria and Houghton Closed	\$2.5 - 3.5 million/yr	\$6 - 9 million
C	Northeast Built; Factoria & Houghton Closed; South County Not Built	\$3 - 4.5 million/yr	\$9 - 15 million
C**	Northeast Built; Factoria & Houghton Closed; South Not Built; Algona Self Haul Only	\$3 - 4.5 million/yr	\$9 - 15 million

D	Northeast & South County Not Built; Factoria Expanded; Houghton Closed	\$2 - 3.5 million/yr	\$9 - 15 million
D**	Northeast & South County Not Built; Factoria Expanded; Houghton Closed; Algona Self Haul Only	\$2 - 3.5 million/yr	\$9 - 15 million
D***	Northeast & South County Not Built; Build New Factoria; Algona & Houghton Self Haul Only	\$2 - 3.5 million/yr	\$9 - 15 million

*Renton to be closed in all of the above scenarios.

I hope you find that these cost estimates are helpful for your presentation. We apologize for the delay in getting these numbers to you. Even though these are presented as an estimated range, the scenarios elicited much discussion even though we have limited information to act upon at this time. If you have any questions about these costs, please let me know.

Sincerely,
Kim Kaminski (formerly Shanley)
 Government Affairs, Pacific NW/British Columbia
kshanle1@wm.com

Waste Management
 720 4th Ave, Ste 400
 Kirkland, WA 98033
 Tel 425 814 7841
 Cell 425 293 9352

Appendix C: Drive Time Analysis

Alternatives Drive Time Maps

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/TWMP-Alt-Drive-Time-Maps.pdf>

Appendix D: Detailed Transfer System Alternatives

Alternatives Station Detail

Appendix E: References

2001 Comprehensive Solid Waste Management Plan

<http://your.kingcounty.gov/solidwaste/about/planning/documents-planning.asp#comp>

Draft 2013 Comprehensive Solid Waste Management Plan

<http://your.kingcounty.gov/solidwaste/about/Planning/documents/2013-swd-comp-plan.pdf>

Solid Waste Transfer and Waste Management Plan

<http://your.kingcounty.gov/solidwaste/about/planning/documents-planning.asp#plan>

Ordinance 17437 (procurement)

<http://your.kingcounty.gov/mkcc/clerk/OldOrdsMotions/Ordinance%2017437.pdf>

Milestone Report 1

http://your.kingcounty.gov/solidwaste/about/planning/documents/Milestone_report-1.pdf

Milestone Report 2

http://your.kingcounty.gov/solidwaste/about/planning/documents/Milestone_report-2.pdf

Milestone Report 3

http://your.kingcounty.gov/solidwaste/about/planning/documents/Milestone_report-3.pdf

Milestone Report 4

http://your.kingcounty.gov/solidwaste/about/planning/documents/Milestone_report-4.pdf

Independent, Third Party Review of the Solid Waste Transfer and Waste Export System Plan

<http://your.kingcounty.gov/solidwaste/about/planning/documents/solid-waste-transfer-export-review.pdf>

Final Supplemental Environmental Impact Statement Transfer and Waste Export System Plan for King County, Washington (Draft Supplemental EIS published under the title: Waste Export System Plan for King County, Washington)

http://your.kingcounty.gov/solidwaste/about/planning/documents/TransferWasteExport_FSEIS2006-08-28.pdf

Appendix F: Ordinance Responsiveness Summary

Requirements	Ordinance Line	Response
Tonnage projections, to be based on waste volumes from cities that have indicated commitment to the regional solid waste system through 2040	9	Figure 2 Appendix B.1
Revenue projections, to be based on waste volumes from cities that have indicated commitment to the regional solid waste system through 2040	12	Report section "Assumptions" Page 8
Overall costs of the region-wide transfer station upgrade	15	Appendix B, all sections
Functionality and service alternatives at the respective transfer stations	16	Report section "Alternatives" Page 10 and <u>Alternatives Station Detail</u>
Level of service criteria addressed in the 2006 plan, with particular attention to options for revision to the travel time criterion in the plan, which requires that ninety percent of a 18 station's users be within thirty minutes' travel time	17	Table 5 and Appendix C
Retention and repair of the existing transfer station including itemized cost estimates for retention and repair and updated long-term tonnage projections	20	Appendix B.2
The recommendation 4 of the King County Performance Audit of Solid Waste Transfer Station Capital Projects, which requires systematic analysis of <ul style="list-style-type: none"> • incremental cost impacts of the number, capacities and functionality of the transfer stations and • assessment of project financing and delivery methods. 	22	Appendix B, all sections <u>Workshop 3 materials</u>
The division, as part of the report, shall <ul style="list-style-type: none"> • document all efforts to engage stakeholder groups, • document all feedback received from stakeholder groups and • document any steps taken to incorporate this feedback into the final report. 	29	Appendix A

Appendix G: Responsiveness Summary and Comments Received

The final report will contain a responsiveness summary followed by all of the written comments received between October 9 and October 23, in their entirety.

**BREKKE JOHN
(BREKKE PROPERTIES)**

**BREKKE JOHN
(BREKKE PROPERTIES)**

From: SWD, WebSite
Sent: Friday, November 01, 2013 11:24 AM
To: John Brekke
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: John Brekke
ADDRESS: Medina, WA 98039
EMAIL: john@brekkeproperties.com
COMMENTTYPE: Suggestion
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: Draft Transfer Station Report Comments

Please provide an overall openness to consider other alternatives. The references to failure are not appropriate when alternatives exist to extend the life of our existing transfer stations.

King County should align policies, fees, and regulations to emphasize, incentivize, and compel reuse and recycling of waste toward Zero Waste of Resources.

If County facilities are to take a more active role in diverting reusable products and materials from its waste stream, King County Code regarding salvaging and scavenging should be altered to reflect that priority.

Please show how Solid Waste is incorporating the 139 potential new strategies that were recommended in the July 2013 Optimized Transfer Station Recycling Feasibility Study into future and current transfer stations. Implementing the 139 recommendations and new recycling strategies in the July 2013 HERRERA Optimized Transfer Station Recycling Study will drastically change transfer station usage, demand and physical requirements.

Most of the recycling is currently done outside the main transfer building. Recycling can be implemented at existing sites that do not have it. Please start implementing existing recommendations that do not require a decision on a new transfer station and will require a lower level of capital cost.

King County needs to study the option of co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities.

We have an existing transfer system that has some strategically located new stations that can work together with the older stations. Together we can extend the life and use of what is currently in place without building new stations.

King County Solid Waste failed to come up with new, creative and innovative ideas to challenge the 2006 Solid Waste Transfer and Waste Management Plan. Rather, upon review, King County Solid Waste is continuing to push through on its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan but in part to determine if changes could be made that could reduce future expenditures.

Processing technologies to increase diversion exist to address the commercially collected and self-hauled material streams delivered to the County's facilities. There are a limited number of commercially viable technologies for treating

commercially collected residual waste: • Advanced Thermal Recycling/Waste-to-Energy ? a process of generating energy in the form of electricity and/or heat from the incineration of waste. • Mechanical Processing to Create Refuse Derived Fuel ? a fuel produced by shredding and dehydrating waste into fuel pellets. The pellets are then burned in a waste-to-energy facility or another industrial facility such as a cement kiln. • Mechanical Biological Treatment - a type of waste processing facility that combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion. King County should study these options in this report and more fully before proceeding with new transfer stations.

Numerous functional and service alternatives were not fully explored. These include further options of continuing use of existing transfer stations for various types of users, changes in operating hours, development of new class of small business haulers, addition of services on adjacent land, and use of private service providers.

It is prudent to eliminate the acceptance of most standard curbside recyclables at transfer facilities, as it is more efficient and cost effective to collect them at the curb. The space and resources at the stations could be used instead for collection of other materials that are not easily collected curbside.

King County estimated that its transfer stations and landfill received about 90,000 mattresses weighing more than 3000 tons for disposal in 2011. A policy should be developed to ban the disposal and recycle of these 90,000 mattresses.

Please explore options such as 80% of system users within 40 minutes travel time. Options like this were not explored in the report.

Please also revisit level of service criteria and recommend other changes that will meet King County's needs while providing future flexibility. For example, one such change could be that Bow Lake provides emergency storage for Algona.

Please be sure retention and repair costs and the overall report takes into account adjacent land that King County already owns at Factoria, Algona, Houghton and other locations.

Debt service obligations are now increased and near-term ratepayers are going to pay more for the system and infrastructure than they need to past 2028 because of changes with number of cities participating in the ILA. Please have the King County Performance Audit updated.

Feedback was received but feedback was rebutted by King County Solid Waste and not incorporated to make a better transfer plan moving forward. Very little time was given for the study transfer station options and additionally very little time was given for feedback on the Draft report.

In 2004, when Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense. Since that time, parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. More capacity has been created a Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted. The King County Transfer Station DRAFT Plan Review indicates differently and the above must be addressed.

What is the hurry? Do it correctly. Do it once and do it right.

Please study the option of using storage capacity at newer transfer stations such as Bow Lake in an emergency and limiting emergency service at older facilities such as Renton or Algona. Please also study the option of trailer storage of refuse on the adjacent land that King County owns in Algona and other facilities.

Please study the use of privately owner transfer stations and recycling centers and how they might substitute or supplement King County owned facilities.

RPC was very concerned about the lack of time to process and comment on the draft report. Please recommend more time for the involvement of stakeholders.

Upon issue of the DRAFT Review, public perception is such that Solid Waste is pushing its agenda through at any expense.

Extending the life, remodeling and enhancement of the existing transfer stations will maximize rate payer value and provide rates as low as reasonably possible. This is achievable especially will some compromise on level of service objectives.

Recommended changes found in audits and 3rd party reports from GBB report in 2007 and HERRERA report in 2013 have not been incorporated into the Transfer System Plan and this report. Processing recycling at Bow Lake and Shoreline is possible but would require extensive operational changes. Solid Waste should implement and understand tipping floor sorting and recycling before building new \$80 million transfer stations that might warrant changes.

Storage for disasters can be achieved using extra capacity on the inside of newer transfer stations. In the event of a disaster, waste can also be directed from older transfer stations to newer transfer stations or to transfer stations outside the disaster area. Disaster refuse can also be stored in trailers at existing transfer stations and on adjacent land already owned by King County at locations such as Algona. Temporary direct haul Cedar Hills Landfill can be used in the event of a disaster. King County can also pursue disaster agreements with Seattle Solid Waste, Tacoma Refuse and other municipalities. Please incorporate these options into the report.

The overall pursuit of alternatives even be it incremental improvements or changes is missing, thereby not arriving at the best solution for ratepayers. Solid Waste is overlooking the intent of Ordinance 17619 and its author(s).

Given the lack of innovation and Solid Waste's desire to continue with a minor variation of the Base Plan (possibly phase North King County), a third party independent review is necessary. An independent review happened in the original 2006 Plan and therefore it is important to do so now, if not more important given King County Solid Waste's position. Had King County Solid Waste demonstrated they are thinking outside the box in the Review and thorough in its reporting it may not be necessary, but because King County Solid Waste has not done so it is necessary to consult with an unbiased, independent third party.

A reduction in staff and lost jobs at King County Solid Waste would be a potential result in not building new transfer stations. King County Solid Waste staff could be biased in the preparation and presentation of information. A third party report will help insure the overall task and information is being processed in the most unbiased manner.

Please detail out the specifics of failure for each criteria for each location and include the degree of failure and date of any future failures. King County Solid Waste should study how each failure can be improved upon or overcome. Incremental improvements will extend the life of transfer stations and provide future flexibility in the system. There are advantages to waiting before spending approximately \$80 million on a new transfer station.

Please make at least some suggestions or modifications on how the private sector could positively impact the transfer stations and reduce the need to build new stations. Stakeholders are looking for solutions in as many areas as possible and the private sector can help. The private sector has the ability to reduce the demand on transfer stations.

Since the approval of the plan, King County has acquired additional adjacent land which can be used to make level of service improvements. Please evaluate how this additional land can be used to make improvements other than replacement of the existing Algona facility.

Bow Lake has extra land available. Please note this in the report and how this land can be used to mitigate changes and increased demand in the future.

Please flesh out the use, option and impacts of more participation with private service providers as noted in Milestone Report 1, 2,3and 4. Many dates, costs and factors have changed since these reports have been issued.

The following policy and program initiatives resonated as the top opportunities from outside research that have real potential for King County, and address the primary constraints identified: Maximize the use of disposal bans where markets are in place in order to divert materials and products to the appropriate private reuse and recycling infrastructure Refine the use of recycling fees to emphasize curbside collection of traditional recyclables and to create more opportunity for other targeted materials. Enhance program initiatives in product stewardship and use public collection and processing infrastructure to leverage existing or developing private collection and processing infrastructure. Refine waste acceptance and handling policies that restrict more active involvement by County staff in facilitating diversion of materials to reuse and recycling.

A new ILA was just adopted and new language, provisions, policies and requirements are contained in the newly signed agreement. Please review these changes and how they impact the overall Solid Waste Plan and the Transfer System Plan.

More alternatives and or combinations of alternatives need to be studied. Additionally options on how they get purposed whether it be for self-haul, commercial haul, yard waste or recycling.

The costs need to be presented in a systematic manner with incremental costs presented for each station being remodeled in addition to the proposed rebuild. Costs figures need to be presented in a more incremental way. Solid Waste has lumped alternatives together which could be appropriate but in doing so confuses the reader and also presents the information in a complicated manner

King County is scheduled to conduct a rate study in 2014. The rate study and results should be incorporated into this report. A rate study has not been done for a number of years.

King County solid waste disposal rates are significantly lower than the tipping fees in adjacent jurisdictions. How will changes in rates affect future system demand and reduce the need to build new transfer stations?

Development of a framework for financial policies and host city mitigation, including compensation agreements needs to be studied in this report.

Shoreline and Bow Lake capital costs should be paid off before 2028 because of the withdrawal of Bellevue and other cities from the interlocal agreement.

Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 ? 2028. This affects the Houghton Transfer Station and Bellevue. This is a short term problem and therefore a short term solution is warranted. By continuing with the long term plan and if cities do not renew the Inter Local Agreement then there are fewer people to share the capital costs. Changes to the ILA?s and the cities participating in the system will impact the development and configuration of the system, future capital investments, services and rates.

Please study the benefits of restricting use or changing the rates for users from Pierce County using the Algona Transfer Station.

Please study the benefits of restricting use or changing the rates for users from the City of Seattle using Bow Lake, Renton and Shoreline Transfer Stations.

Please study the benefits of restricting use or changing the rates for users from the City of Bellevue after the year 2028 using Factoria and Houghton Transfer Stations.

Extending operating hours is a very cost effective use of facilities. Please study extending hours of operation at each station as a means to mitigate wait times and provide further options for both commercial and self-haul.

Please mention currently used private transfer stations in use for yard waste, recycling, construction debris and refuse. More private transfer stations can be reintroduced.

Please study the alternative whereby no transfer stations are closed and transfer stations are remodeled with commercial service remaining at all locations. This alternative will likely result in the lowest collection costs and therefore an important alternative to consider in this report.

Traffic studies should be performed verses using web based drive times. Specific frequency and length of wait times should be studied. An overall rate study on collection costs and other costs should be performed.

Cities negotiate contracts with their haulers and should be given time to discuss options and costs with their current haulers and other potential haulers.

Please include the impact of the possible future changes Cedar Hills Landfill rent payments to users for the use of Cedar Hills Landfill.

Please include possible future costs to haul waste outside King County when Cedar Hills Landfill is projected to reach capacity in 2028 which is before the end of this study and the ILA in 2040.

Please further study all original 17 level of service criteria and recommend even small changes that will help improve the transfer system or specifically reduce the need to new transfer stations.

Please specify details of frequency of failure and possible solutions to minimize failure. Please note the option of current and future additional rural drop boxes to help provide options and mitigate drive times.

The scoring system is too negative in its rating scale. A wait time slightly exceeding 10% would equate to failure and this over dramatizes the wait time issue. Please be transparent in the presentation of information and don't project a bias.

King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility in addressing ?issues?. Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Please fully explore options, incentives, restrictions, policies and changes with self-hauling. A combination of changes to self-hauling with extend the life and potentially reduce demand on the transfer station system. Increasing tipping and self-haul rates to meet or exceed neighboring municipalities such as Seattle, Tacoma and Pierce County will reduce demand on our transfer system. Please specifically study the elasticity and changes to rates and tipping fees.

Please report on the increased use and of alternative fuels such as compressed natural gas by commercial haulers.) The report should mention that new trucks are also more fuel efficient.

Please study the impact of potential increased use of onsite waste compactors by commercial property owners and apartments thereby dramatically reducing traffic and GHG emissions.

The rate study to be performed in 2014 should first be incorporated into this report prior to issuance of the final transfer station report.

What could Solid Waste add to existing transfer stations (i.e. recycling, yard waste) to mitigate issues vs. building an ideal transfer station based on a dated Transfer and Waste Management Plan. Do not let ideal features decide the future size and use of transfer stations. Rather, the approach King County Solid Waste should take is: what can be added to existing transfer stations to mitigate solid waste and transfer matters? There is an innovative way to provide similar services at transfer stations but address how each transfer station will accomplish it differently.

Should King County co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities?

Should King County construct a regional resource recovery park for multiple recyclable and compostable materials at a new site and how will this affect the overall transfer station system?

Should King County site, design and build new King County solid waste facilities to align collection and processing in advanced materials management system and how would this affect transfer stations?

Please look at not closing Renton, Houghton and Algona transfer stations and further evaluate alternatives around these.

Renton is closed in all alternatives and this affects South King County where a new transfer station is being considered. It makes no sense to close the Renton transfer station thereby causing system constraints that lead to building a new location. Please evaluate keeping Renton open in all alternatives.

King County code (KCC 10.12.021.G) allows fees for recycling to be set lower than those for disposal to encourage recycling over disposal. The use of differential fees is an important tool for increasing reuse and recycling. Please study the impacts of changes in fees and future needs of transfer stations. Numerous cities in King County do not require curbside recycling and please study the impacts of this in the report.

The mission of King County's waste reduction and recycling programs is to divert as much material as possible from disposal in a manner which reduces the overall costs of solid waste management to county residents and businesses, conserves resources, protects the environment and strengthens the county's economy. The draft 2013 Comprehensive Solid Waste Management Plan should be updated and incorporate the July 2013 HERRERA Optimized Transfer Station Recycling Study before issuing the 2013 Comprehensive Solid Waste Management Plan in its final form.) The HERRERA report presented 139 recycling strategies and these were allocated among station generations as follows: ? Sixty-four (64) strategies were applicable to all stations ? Seven (7) strategies were applicable to older stations only ? Forty-one (41) strategies were applicable to updated/retrofitted stations AND new stations ? Fifteen (15) strategies were applicable to new stations only. These 139 strategies need to be fully considered before building or closing any transfer stations.

SWAC and MSWMAC and KCSW should review the July 2013 HERRERA Optimized Transfer Station Recycling Study and consider revising the Recycling Scenario 3 before this Draft Transfer Station Plan Review is adopted.

What if we another and more rigorous Recycling Scenario is licked and how would this change transfer system demand and requirements?

Disposal bans at transfer facilities for priority materials such as clean wood, scrap metal, yard (and land clearing) waste, mattresses, and cardboard are not being used to the maximum extent possible to advance Zero Waste of Resources goals.

Overall recycling and zero-waste initiative goals are lacking in this report and have a very significant influence on how we use the King County Transfer System.

A fee on traditional material recycling at transfer stations should compel customers to place them into the curbside collection system, if it is available, rather than travel to transfer facilities. This reduces vehicle travel overall, and produces fewer emissions.

Please spell out specifics on when limitations are put on recycling because of system constraints. Such as in what year and how often recycling and other service capacities are overloaded.

Drive time maps have multiple overlaps whereby 90% of users can still choose other transfer stations or regional drop boxes to access. Please make sure this is option is clear to the readers of this report.

Please apply criteria in the report to each facility and do not lump into alternative groups.

Please suggest ways to meet criteria at each location and also as a group. Ideas include keeping Renton open, creating new alternatives, additional remodel, and use of adjacent land.

Please evaluate the use of the additional land that King County purchased in Algona. This can be used as expansion space for Algona while keeping or remodeling the current structure. It is a major oversight not to consider how this additional land can be used to meet current needs, add services or come closer to meeting criteria.

There is also an opportunity for thinking differently about the flow of material, such as partnering with Cities for alternative spaces and drop box sites using City real estate.

Auburn and Algona have also expressed concern about the 3 replacement sites being evaluated for South King County. The City of Bellevue and the City of Kirkland are the only one's mentioned that have concerns.

Houghton has adjacent land that can be used to add some recycling and/or other services or improvements.

What would it cost to add compaction in Houghton and other potentially remodeled transfer stations?

Shoreline is in a residential area and has increased hours of operation why is Shoreline different than Houghton?

Please evaluate extending hours of operation for all alternatives studied.

What specific times and year would Bow Lake need to be limited to self-haul and recycling?

Bow Lake has some additional land that can be used to help provide capacity. Please study the additional Bow Lake land that is available.

What if Algona and Renton where open just on the weekends to mitigate impacts at Bow Lake?

It is misleading not to disclose and study the adjacent Algona transfer station land recently purchased by King County.

How would Algona wait times change if Renton was left open? How would Algona wait times change if Peirce County users were restricted or discouraged from using Algona? What if hours of operation where extended in Algona?

Please specify the details of not meeting the drive time standard. For what % of the service area is this the case for? Are current rural drop boxes included in reaching this conclusion?

How would the proximity of Seattle's, Snohomish County and Pierce County's transfer stations help mitigate impacts or change results under all alternatives?

Please disclose the cost to add compaction at the same time as remodel is done at any transfer facility. Compaction maneuvering area can be done in less than 200 lineal feet. Most trucking facilities do not operate with 200 lineal feet of maneuverability but closer to 100 lineal feet.

In Algona, yard waste can be accepted by the current landscape supply company that King County leases to. By having yard waste accepted on the adjacent property, the Algona transfer station could keep commercial service open or provide two lanes of self-haul service.

Please study the option of Algona having both commercial and self-haul remain.

Please study the option of two lanes of self-haul being provided in Algona.

Please study how the adjacent King County owned land in Algona can be used to help minimize traffic impacts to local streets.

Please study how the adjacent Algona land can be used to provide recycling and yard waste services.

Since the 2006 Transfer Station Study, King County purchased land in Algona adjacent to the current Algona Transfer Station. This adjacent land was purchased in 2012. Why is King County Solid Waste not studying the option of using this adjacent land. It appears irresponsible not to include this land in the studies.

If operating hours are extended, this will help reduce vehicle capacity failure from happening at least 10% of the time. Please explore extending operating hours in this report.

Please study the option of street improvements to West Valley Highway in Algona. Designated turn lanes could be added to West Valley Highway.

Please study how access to Algona can be changed whereby vehicles enter the Algona Transfer Station as far north as Iowa Drive. Vehicles can be given a large area to queue that is off the surrounding streets.

Please study moving the current transfer trailer storage in Algona to the adjacent property already owned by King County. This will help create additional queuing area and thereby reducing impacts to area streets.

All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirements.

Please provide collection cost data impacts for each city in King County.

A financial incentive is good for haulers to avoid using the King County Transfer Stations because it reduces the need to have new and/or larger transfer stations. Please study what would change in the alternatives if a lower regional direct rates was reintroduced.

How would a change in the regional direct rate impact transfer station capacity in South King County? This concern was also brought up in the review of the Plan. Please provide equity to South King County in your review of this possibility.

The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was effective. Direct haul can extend the life of existing transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.

Please study the costs and benefits of direct haul to Cedar Hills and/or another transfer station during the period of construction of a transfer station verses keeping the transfer station open during construction.

Please study the costs and benefits of using Cedar Hills for limited peak periods and in the event of emergencies or service disruptions to a transfer station.

Why are there no policy changes, incentive ideas, rate adjustments, incorporation of 3rd party recommendations or new ideas presented in King County Solid Waste's report? Numerous excellent ideas could be incorporated into this report which would change future transfer station requirements

The long term issue of Cedar Hills Landfill capacity constraints, potential impacts of policy changes and zero waste initiative goals have largely been skimmed over and not appropriately studied in this report.

Collaboration with stakeholders was limited because of time constraints and King County Solid Waste's control of information, the process and alternatives.

This study arrives at an improper conclusion for multiple reasons including the fact that Algona has adjacent land already owned by King County that needs to be incorporated into the study. Further, the existing Renton Transfer Station could remain open to help adequately serve South King County. One or more changes in the alternatives could result in a different conclusion. A 3rd party audit of the report should be done to reveal any other considerations, alternatives or changes that should be made to this report.

Please mention that the South King County cities of Algona and Auburn have the same permitting risks and concerns as Bellevue. Please provide equity in this report by mentioning the same risks and concerns. Algona and Auburn are the identified cities in the EIS for the 3 South King County sites.

What specific amount of South King County population growth will be within a 30 minute drive time of the current Enumclaw Transfer Station?

The Shoreline Transfer Station has adjacent homes and parks. Why is Houghton being given preferential treatment because of residences?

The Renton Transfer Station has recycling and also the ability to expand on adjacent vacant land. Why are we not considering alternatives that keep Renton open?

King County Solid Waste has options available to meet demand for years to come while at the same time limiting capital expenditures. Waiting to build new transfer stations will allow future transfer stations the ability to be different if need be to meet future changes in waste handling, recycling and technology. Shoreline, Bow Lake and possibly Factoria are newer stations and we can wait to build the next generation of transfer stations in the Northeast and South County and in doing so the next generation of transfer stations will likely be superior.

Why has the division not presented other variations to alternatives and only one variation to the Base Alternative? Stakeholders want to be presented with other options that meet or come closer to meeting forecasts.

Other solutions and alternatives exist whereby the Algona Transfer Station is not replaced and South King County would still have equivalent services as other parts of the County.

How are the specific justifications for phasing different in the South King County from the North King County? South King County already has Bow Lake, Renton, Algona, Enumclaw, Cedar Falls Dropbox and Cedar Hills Landfill how is phasing and waiting to build in North King County so very different than waiting to build in South King County?

Be reasonable. Do not overbuild. Listen to the communities. Be innovative. Solid Waste is jamming new transfer stations down the public's throat at their expense. If a transfer station is overbuilt it is a waste to rate payers. Solid waste transfer and waste management is an important issue, but if not done correctly mistakes are very costly. A careful and timely consideration of these alternatives by decision makers will be needed as part of the transfer system plan.

Please attach the HERRERA Optimized Transfer Station Recycling Feasibility Study done in July 2013 to this report in both the Appendices and also in the body of the report under recycling and other sections.

As the County proceeds to modernize its transfer system with the siting, design, and construction of new facilities, and the updating or moth-balling of others, stark choices exist:

- ? What is an appropriate level of recycling to accomplish at existing and new facilities?
- ? Should the County do material processing itself to accomplish its Zero Waste goals? At what level?
- ? What type of partnership should the County have with the private sector?
- ? What is the best mix of facilities (and where should they be) to maximize diversion efficiently?

IMG_VERIFY: FXD

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 11/1/2013 11:23:32 AM

**BREKKE JOHN
(BREKKE PROPERTIES)**

BREKKE JOHN

(VIKING DEVELOPMENT)

From: John Brekke <john@brekkeproperties.com>
Sent: Monday, February 03, 2014 3:28 PM
To: Yates, Diane
Subject: FW: Transfer Station Plan Comment Letter - John Brekke
Attachments: Transfer Station Plan Letter to KC Exec JWB 02-03-2014.pdf

Importance: High

Diane,

Please consider the attached letter as part of public comment related to the King County Transfer Plan.

Thank you,

JOHN W. BREKKE, CCIM
PACIFIC WEST REAL ESTATE, LLC
PO Box 287
MEDINA, WA 98039
(425) 451-1511 OFFICE
(425) 451-9663 FAX
(206) 227-7990 CELL

From: John Brekke
Sent: Monday, February 3, 2014 3:16 PM
To: 'kcexec@kingcounty.gov'
Cc: 'sung.yang@kingcounty.gov'; 'pat.mclaughlin@kingcounty.gov'; 'natalie@nataliequickconsulting.com'
Subject: Transfer Station Plan Letter - John Brekke
Importance: High

Dear King County Executive Constantine,

I'm attaching a Transfer Station Plan comment letter concerning the proposed North Auburn transfer station site along West Valley Highway. Please consider this letter as part of public comment related to the King County Transfer Plan. I welcome any questions you may have.

Thank you for representing the interests of businesses and citizens in King County.

Sincerely,

JOHN W. BREKKE, CCIM
PACIFIC WEST REAL ESTATE, LLC
JOHN@BREKKEPROPERTIES.COM
PO Box 287
MEDINA, WA 98039
(425) 451-1511 OFFICE
(425) 451-9663 FAX
(206) 227-7990 CELL

VIKING DEVELOPMENT, LLC
10423 MAIN STREET, SUITE 6
BELLEVUE, WA 98004
(425) 451-1511

February 3, 2014

The Honorable King County Executive
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear King County Executive Constantine,

Viking Development, LLC is the owner / operator of three properties on or near West Valley Highway in Auburn, totaling 170,000 sq. ft and home to 45 local tenants.

The 45 tenants we represent span a number of industries, including: employment agencies, research & development firms, retailers, education service providers and design companies.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that a **North Auburn site would be an inappropriate use of public dollars.**

We submit this letter as part of the King County Transfer Station Plan public comment period.

Our firm also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **what's the emergency?**

Take the Time for a Comprehensive Analysis

A thorough process analyzing current King County Transfer stations, as well as the South King County Transfer Station Environmental Impact Statement, should fully include consideration of the following studies, which are underway:

- The Optimized Transfer Station Recycling Feasibility Study completed July 2013, with 139 recommendations yet to be implemented;
- Findings from a Sustainable Solid Waste Management Study, to be issued in the first quarter 2014;
- Incorporation of findings in the proposed 2014 Solid Waste Rate Study; and
- Consideration of how this new transfer station will impact the County's goals of

'Zero Waste' by 2030.

North Auburn Site an Inefficient Use of Investment Dollars

As a commercial business invested in the North Auburn community, we wish to see our government making wise decisions about spending and investment. The site that is most viable for the County, for the community and for fiscal responsibility is an expanded Algona Station. Here's why:

- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station

Since King County's 2006 Transfer Plan, new stations totaling more than \$300M in public funds have been built in Vashon Island, Shoreline and Bow Lake, along with a permitted Factoria station.

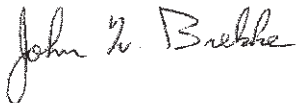
Building *four new King County transfer stations in just seven years* is an astounding investment of public funds and it is clear we are not faced with a dire transfer station capacity problem now or in the foreseeable future. Rather, *we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.* **Let's not risk overbuilding.**

To maximize cost effectiveness and regain the trust of the North Auburn community, we urge King County to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of this sensible and fiscally responsible option as part of the EIS.**

We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,



John W. Brekke
Viking Development, LLC

From: Eleanor Brekke <eleanor@brekkeproperties.com>
Sent: Tuesday, October 22, 2013 3:22 PM
To: Yates, Diane
Subject: RE: Draft Transfer Plan Review Report
Attachments: EBP King County Transfer Station Draft Plan Review Comments 10-23-2013.pdf

Diane,

Please see my attached comments to be incorporated into the Transfer Plan Review Report.

Thank you,

Eleanor

From: Yates, Diane [<mailto:Diane.Yates@kingcounty.gov>]
Sent: Wednesday, October 9, 2013 2:51 PM
Subject: Draft Transfer Plan Review Report

Hello,

The draft Transfer Plan Review Report is now posted at the link below:

<http://your.kingcounty.gov/solidwaste/about/plan-review.asp>

We recognized at the beginning of the transfer plan review process that the task was tall and time was short. We want you to know that we appreciate the time commitment you made to participate in this process. We value your input and look forward to continuing to work with you. Your input, along with the efforts of division staff in researching and analyzing all the alternatives, resulted in a draft report that we believe represents the best options for the region.

The comment period is now open. Please submit comments on the draft report in writing to me. Comments are due no later than October 23rd. All written comments will be considered and a final report will be released on November 27th.

Sincerely,

Diane Yates

Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104
206-477-5212

**PARKS (BREKKE) ELEANOR
(BREKKE PROPERTIES)**

**Eleanor Parks
P.O. Box 287
Medina, WA 98039**

October 22, 2013

Diane Yates
Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

RE: Transfer Station Plan Review Comments

Dear Ms. Yates:

Please incorporate the following comments into the King County Solid Waste DRAFT Transfer Plan Review report dated October 9, 2013.

Algona expansion options need to be explored

- King County needs to disclose it already owns adjacent Algona land parcels in report. This land was purchased to preserve expansion options for Algona in June 2012.
- Adjacent King County land can be expanded onto and used to add recycling, yard waste, queuing, trailer storage and other level of service improvements in Algona.
- Report needs to address Algona expansion possibilities with or without a remodel being done.
- The report is misleading because report references no ability to expand on the Algona land that King County already owns.
- In 2001, recycling services were proposed and planned for Algona. Adding recycling in Algona is possible, especially now that King County owns adjacent land.
- In 2006, waste compaction was explored in Algona. Waste compaction is possible to add in the Algona remodel option. Please update Algona remodel costs to include compaction.
- 200 lineal feet for waste compaction truck access is an over estimate and it exceeds typical warehouse truck maneuvering areas. Waste compaction can be added in Algona in less than 200 lineal feet.
- Two Algona self-haul lanes should be studied verses one self-haul and one yard waste lane. This is an important option that needs to be studied in the report. Two Algona

self-haul lanes will reduce self-haul impacts at nearby transfer stations such as Bow Lake, Enumclaw and Renton.

- Study needs to also look at leaving one self-haul and one commercial lane in Algona. This option continues the current use and needs to be fleshed out by pairing with other alternatives studied in the report.
 - Algona yard waste service can be provided on adjacent King County land by current tenant Interwest Landscape Products or similar tenant like Pacific Topsoils. Landscape product suppliers typically receive yard waste from their customers. King County owns the adjacent land, is leasing it, and can require tenant to receive yard waste.
 - Cedar Recycling, which is in close proximity to Algona, needs to be mentioned in report. Cedar Recycling is currently receiving metals, plastics and cardboard. Cedar Recycling has plans to rebuild and expand.
 - Page 1 of report: “these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor.” This statement is incorrect and misleading. Algona has adjacent additional land that can be utilized.
 - Reference to a Redefined Criterion 8, this reference is confusing. Algona has the ability to expand. (Page 8 of report)
-

Rates need to be studied further

- Report Page 8: “As one hauler noted, ‘A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates.’”
- Information from haulers is arguable and incomplete. The estimates, data, and opinions are limited therefore requiring risky interpretation and misleading information.
- Cities need to have time to directly communicate, receive and negotiate cost estimates from their haulers and competing hauling firms.
- Individual city and private hauler contract terms, costs and contract duration data needs to be added to the report.
- Hauling Rates Report results are fouled because of the mixing of North King County and South King County rate information.
- ILA has not been signed and finalized by King County. This impacts the ability to be accurate on rates and therefore rate projections cannot be relied upon.
- A 3rd party, independent study needs to be performed on hauling rates. Use GBB Solid Waste Consultants, HERRERA Environmental Consultants or other consultants.
- Waste hauling to areas other than Cedar Hills Landfill needs to be part of study and how it impacts rates because Cedar Hills Landfill is projected to reach capacity before the year 2040.
- Hauler fuel costs and greenhouse gas emissions will go down with use of alternative fuels (compressed natural gas) and increased truck efficiency. This is an increased trend and needs to be mentioned in report.

- The report needs to accurately describe the source of anticipated housing, density and population growth.
- Rate changes will have an effect on customer frequency and volumes to Transfer Stations. Rate elasticity and impacts should be incorporated into report.
- Haulers get to choose and King County does not control their use of multiple Transfer Stations which needs to be further studied and disclosed in the report.
- Cities or Kind County could make haulers use a specific transfer stations which needs to be studied.
- Haulers can change use patterns based on traffic, drive times, base locations and costs which needs to be studied in the report or by a 3rd party traffic consultant.
- Commercial hauler bases as well as private transfer stations should be shown on maps in the report.
- Report lacks acknowledgement of private yard waste and recycling service providers which play a vital role. Providers should be mapped and referenced. They play a vital role in the Transfer System and the recycling lifecycle.
- This report should remain in draft form until the proposed/pending 2014 King County Solid Waste rate study is performed, critiqued and incorporated accordingly.
- Small business users of the Transfer System should be treated as a separate class in the system with differentiated rates, hours and ability to access stations.
- Alternatives, costs and policies limiting self-hauling need to be studied in the report.
- Self-haul tipping fees are about 50% higher in the City of Seattle and in Pierce County. King County should raise rates to match or exceed neighboring jurisdictions. By not raising tipping fees, King County is directing extra burden on the Transfer System. The report should study the impact of less transfer station use due to raising tipping and other fees.

Recycling and environmental aspects missing

- Report needs to address long term recycling trends and ability of ordinances, policies and rates to influence volumes.
- Report references to tipping floor sorting are made. Little to no tipping floor sorting is done nor is there a specific use plan outlined by Solid Waste.
- “however, environmental analysis related to the recycling options for each alternative was beyond the scope of the review” Recycling and environmental trends are a focus and need to be in the forefront of the report.
- Bow Lake recycling just opened in October 2013 and we need to understand how recycling affects Bow Lake, the Transfer System, and potential future changes to solid waste and recycling services.
- Waste conversion technologies, which will influence the Transfer Station System, need to be incorporated into the Transfer Plan Review, and be a part of projections out to 2040.
- References to potential increase in greenhouse gases will be countered by increased vehicle efficiency and alternative fuel use such as compressed natural gas.

- The potential for and contemplated use of Biomass processing at transfer stations needs to be incorporated into the report.
- Numerous recommendations in recently issued July 2013 HERRERA Optimized Transfer Station Recycling Feasibility Study need to be further explored, developed and incorporated. These recommendations have drastic impacts to the Transfer Station System.

There needs to be separate South King County and North King County studies done

- Data and results become skewed when too much is tied together in the report.
- A Factoria transfer station decision should happen first and then separate studies for North and South King County should be done.
- South King County should be granted the same wait and see recommendation as North King County. Unfair treatment is being applied to South King County.
- Paired incongruent alternatives, less likely scenarios and limited alternatives are given and studied as the alternatives in the report. These report items need to be corrected.
- Renton transfer station should not be closed and should be studied as remaining open in the report and in all alternatives studied. Multiple use options between commercial haul and self-haul should be studied in the report for Renton transfer station.
- How can transfer stations in Renton and Enumclaw better be utilized and part of the plan for commercial, self-haul, recycling and yard waste? Make these transfer stations part of the plan and specific to solutions and studies in South King County.
- Rural drop boxes should be noted on all report maps. Report information and drive times are misleading without rural drop boxes included.
- Update information and maps to include South Seattle Transfer Station and Pierce County Transfer Stations. Customers do and will take advantage of shorter drive-times and locations of nearby transfer stations outside the ones managed by KCSW.
- Portions of City of Auburn are in Pierce County. Additionally, 10% of Algona transfer station use is from Pierce County. Please disclose this material fact in the report. Please also study the impacts on transfer system capacity when various disincentives are used with Pierce County residents

Advantages of waiting on to build more transfer stations need to be incorporated

- Overall King County Solid Waste System flexibility is gained by waiting to build new transfer stations. New technologies and future trends can be incorporated into the system by waiting to build new transfer stations.
- By waiting to build new transfer stations, capital costs will be smoothed out and impacts to rate payers will be lessened. Please model this approach in the report.
- Ability to wait and phase a transfer plan is advantageous and provides a more accurate delivery of future needs.
- Extending the life of currently functioning and existing facilities is realistic alternative with the best outcome for rate payers.

- King County should wait and see the data and learn from Bow Lake and Factoria before building in South King County and North King County. This will result in a better Solid Waste System which then can be sized and outfitted to meet future needs.
- History of incorrect estimates and planning is a risk factor. Waiting to build new transfer stations mitigates this risk.
- New recycling (carpet, mattresses and other items) will influence Transfer Station System requirements. Waiting will allow future facilities to be adjusted to new recycling products and trends.
- Waste to Energy, Biomass Processing and Zero Waste Initiatives play a part in solid waste plans, needs and impacts to transfer stations. These items need to be incorporated into the report.
- Transfer Stations are an overall antiquated approach in which we should be cautious to invest.

Cedar Hills Landfill future issues and options

- Cedar Hills Landfill is near capacity and is projected to close before 2040. It was first set to close in year 2012, then 2018 and now projected at 2025. The pending Cedar Hills Landfill closing affects Transfer Station System and impacts need to be part of this report.
- Cedar Hills Landfill has the ability to add some direct haul. The specific direct haul capacity needs to be studied and disclosed in the report. Direct haul can partially ease the burden on transfer stations.
- Cedar Hills Landfill can become a Transfer Station site now or at the projected closing date of 2025. This option needs to be studied.

Intermodal and out-of-county transport needs

- South King County has the only potential to provide a transfer station with an intermodal feature included. Determination of specific advantages and system costs of an intermodal transfer station are needed in the report. It is short sided to not have an intermodal facility plan in place before siting a new South King County transfer station.

Policy decision options and impacts

- Mandatory recycling for new items should and will likely be a part of future policies. This will change transfer system needs, volume and results of the study. This needs to be mentioned in the report.
- Bulk curbside pick-up can be done which will limit self-haul demands and therefore transfer station traffic volumes. This option needs to be studied in the report.
- Zero Waste Initiatives will change solid waste system requirements.
- Those using self-haul services that are not part of the KCSW system should be charged a surcharge to use the transfer system. Surcharges should be considered for Pierce

County users and City of Bellevue users. For example, the City of Tacoma charges non-residents a premium to use their solid waste system.

Interlocal Agreement impacts

- Disproportional impacts are experienced and need to be corrected because of cities choosing not to participate in the ILA.
- Existing capital costs and bonds should be paid off before Bellevue and other cities withdrawal from the solid waste system.
- Cities electing not to be part of the current ILA past 2028 should be given a firm deadline until the end of 2014 to lock in their decision. A revised Transfer System plan should not be adopted before this deadline is established.
- A rate differential should be established for cities without extended interlocal agreements. This rate differential should be studied in the report.

Equity and Social Justice concerns

- Equality should be given in the wait-and-see approach to both South King County and North King County.
- Siting a new transfer stations close to Bow Lake further creates South King County as dumping ground of the majority of King County's solid waste.
- The number of proposed transfer stations falls disproportionately on the South King County community.
- Similar to the City of Bellevue with the Factoria Transfer Station, the cities of Algona and Auburn have land use, zoning and permitting issues with the siting of a new transfer station. This needs to be specifically mentioned in the report in order to present information fairly and accurately.
- The City of Bellevue received greater influence, participation and involvement from King County. Equality must be granted to other impacted cities.
- Any additional data or other changes made to this report between October 23, 2013 and November 27, 2013 need to be given further public comment.
- Please remove the overall bias by KC Solid Waste to build new transfer stations. Other functionality and service alternatives were avoided by KC Solid Waste.
- Please present the report with more solutions and available options that do not build new transfer stations. Study of the retention and repair of the transfer stations was a major component of Ordinance 2013-0258 which required this report to be done.
- King County Solid Waste was the one who chose the limited public comment period of two weeks and retained 4 weeks for final report changes. 30 days is a typical public comment period and King County Solid Waste chose a shorter comment period for the public which is an unequal and unfair amount of time to comment.
- Committees, stakeholders and the public were frustrated by the control of the data, selective presentation of options and documentation of accurate feedback by King County Solid Waste.

- There is a projected bias in this report and an independent third party needs to review this study. A third-party independent study will provide additional ideas, verification of data and equitable treatment to all interested parties.
- Transparency of dates, as it relates to level of service passing/failing grades, need to be made in the report. References are made to system failures without specific dates or locations of failures. A matrix or graph system needs to more clearly disclose and present information. Results and data are presented in a misleading way.

Time constraint concerns

- SWAC and MSWMAC Advisory Committees expressed concern about the limited time to property study, assimilate new information and comment on this report.
- Cities (City Managers, Mayors and City Staff) expressed concern about the limited time to property study, assimilate new information and comment on this report
- Public expressed concern about the limited time to property study, assimilate new information and comment on this.
- King County RPC expressed concern about the limited time to property study, assimilate new information and comment on this report.
- The timing the release of this draft report release does not allow cities and groups time to present this report as an agenda item and take action given a commonly used set schedule of meeting times of various interested entities and groups.
- Time should allow for a 3rd Party independent study and review to be done. Last independent review was done in July 2007.
- 2013 Solid Waste Plan remains in draft form and needs to be finalized before revising the transfer station plan.
- The public and interested parties received only a two week comment period which is very short and uncommon (usually 30 days).

Accuracy concerns with the report

- Page 10, "In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available". This is not appropriate to do before spending several \$100 million on a transfer station plan.
- Tonnage forecasts go up and down in the report in multiple areas. Please reference the data to support this change. This data is different than past studies that were published by King County Solid Waste. See Page 11 in report.
- Conclusions and recommendations on page 35 are not supported by the data.
- References to low grades and systems failure is based on minor portions of data not meeting standards and is presented in a misleading manner. Report conclusions of long drive times are drawn by taking from furthest areas and not addressing nearby facilities such as King County Drop Boxes, City of Seattle facilities and Pierce County facilities which border King County and impact the King County Solid Waste System.

- Report categorizes failure as a “C” with exceeding level of service over 10% of the operating hours. The determination and label as failure is misleading to the reader.
- Report reference to “Level C” service equating to failure does not provide appropriate context. A wait 10% or more of the time should not be considered failure.
- The level of service grading scale with wait times is bias toward presenting failure. System grading needs to be equally distributed over the range. The use of letter grades also needs to be changed to numbers or other indicators to present data in a fair and understandable manner.
- Year, frequency and in what areas of King County exceeding “Level C” needs to be provided in the report. A systematic presentation of this data needs to be made in this report.
- Use of the 2027 date is misleading and should be post July 2028 when Bellevue drops out of ILA.
- Travel times vary by time of day, traffic patterns and other factors. These important variables need to be shared in this report.
- Systematic and incremental analysis of impacts, capacities and functionality was lacking in the report and falls short of the intentions of the King County Ordinance 2013-0258.

Per Ordinance 2013-0258 Section B, I hereby request that my comments be documented in the final report. Additionally, I hereby request my feedback be incorporated into this report.

Sincerely,

Eleanor Parks

From: Eleanor Brekke <eleanor@brekkeproperties.com>
Sent: Wednesday, October 30, 2013 1:24 PM
To: Yates, Diane
Subject: Comments: KCSW Transfer Plan Review
Attachments: EBP #2 King County Transfer Station Draft Plan Review Comments 10-29-2013.pdf

Ms. Yates,

Please see my attached comments to be incorporated into the Transfer Plan Review Report.

Thank you,

Eleanor

*Eleanor Brekke
Brekke Properties
PO Box 287
Medina, WA 98039
425.451.1511 tel*

**PARKS (BREKKE) ELEANOR
(BREKKE PROPERTIES)**

Eleanor Parks
PO Box 287
Medina, WA 98039

October 30, 2013

Diane Yates
Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

RE: King County Solid Waste DRAFT Transfer Plan Review Comments

Dear Ms. Yates:

Per Ordinance 2013-0258 Section B, I hereby request that the following comments be documented and incorporated in the King County Solid Waste DRAFT Transfer Plan Review report.

Review Lacks Innovation

Ordinance 17619 requires King County Solid Waste to review the 2006 Solid Waste Transfer and Waste Management Plan and determine if changes are needed to ensure the transfer system is sized/configured appropriately as well as determine if changes could be made that could reduce future expenditures.

In response to Ordinance 17619, King County Solid Waste issued its DRAFT Transfer Station Plan Review on October 9, 2013. The Review lacks new ideas, innovation and thinking that differs from the original 2006 Solid Waste Transfer and Waste Management Plan.

King County Solid Waste failed to come up with new, creative and innovative concepts to challenge and examine the 2006 Solid Waste Transfer and Waste Management Plan. Rather, upon review, King County Solid Waste is continuing to push through with its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006

Solid Waste Transfer and Waste Management Plan, but in part to determine if changes could be made that could reduce future expenditures.

A third party, independent review is necessary given King County Solid Waste's lack of innovation and desire to continue with only a minor variation of the Base Plan (possibly phase North King County). An independent review happened with the original 2006 Plan and therefore it is important to do so now, especially given King County Solid Waste's position. Had King County Solid Waste demonstrated they were thorough in their reporting and were thinking outside the box, it may not be necessary. The Review has shown differently and therefore an unbiased, independent, third party assessment is required.

Upon issue of the DRAFT Review, public perception is such that Solid Waste is pushing its agenda through at any expense.

Review Lacks Flexibility

King County Transfer Station DRAFT Plan Review lacks flexibility and did not pursue this approach in the Review.

King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility and creativity in addressing "issues." Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Do not let ideal transfer station features, based on dated Transfer and Waste Management Plan, decide the future size and use of new transfer stations. Rather, the approach King County Solid Waste should take is: what can be added to existing transfer stations to mitigate solid waste and transfer matters? It is possible to provide similar services at the various transfer stations, but it requires King County Solid Waste to be innovative and flexible on how each transfer station will accomplish it.

If an existing transfer station is lacking then what can be done to mitigate the shortcoming? Can services and technologies at existing facilities be installed to provide similar services throughout transfer stations? Is it necessary for each facility to compact or have disaster storage? What can be done to alleviate these sorts of issues? The Transfer Station Draft Plan Review fails to address these issues as well as address the use of technology and policies to enhance existing sites.

The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was an effective incentive. Direct haul can extend the

life of existing transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.

All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirement.

Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 – 2028. This affects the Houghton Transfer Station and Bellevue. This issue is a short term problem and therefore warrants a short term solution. If cities do not renew their Inter Local Agreement and King County Solid Waste continues with the 2006 King County Solid Waste Transfer Plan, then there are fewer people to share the capital costs associated with the transfer stations.

Solid Waste is jamming new transfer stations down the public's throat at their expense. If transfer stations are overbuilt it is a waste to rate payers.

Review Does Not Address Timing

In 2004, when Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense.

Since that time, parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. More capacity has been created at Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted. The King County Transfer Station DRAFT Plan Review indicates differently and the above must be addressed.

What is the hurry? Do it correctly. Do it once and do it right.

Be reasonable. Do not overbuild. Listen to the communities. Be innovative. Be flexible.

Solid Waste Transfer and Waste Management is an important issue, but if not done correctly mistakes are very costly.

Submitted
Eleanor Parks

From: SWD, WebSite
Sent: Wednesday, October 30, 2013 1:28 PM
To: Eleanor Parks
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Eleanor Parks
ADDRESS: Medina, WA 98039
EMAIL: eleanor@brekkeproperties.com
COMMENTTYPE: Request
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: October 30, 2013

Diane Yates
Intergovernmental and Legislative Liaison Director's Office King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

RE: King County Solid Waste DRAFT Transfer Plan Review Comments

Dear Ms. Yates:

Per Ordinance 2013-0258 Section B, I hereby request that the following comments be documented and incorporated in the King County Solid Waste DRAFT Transfer Plan Review report.

Review Lacks Innovation

Ordinance 17619 requires King County Solid Waste to review the 2006 Solid Waste Transfer and Waste Management Plan and determine if changes are needed to ensure the transfer system is sized/configured appropriately as well as determine if changes could be made that could reduce future expenditures.

In response to Ordinance 17619, King County Solid Waste issued its DRAFT Transfer Station Plan Review on October 9, 2013. The Review lacks new ideas, innovation and thinking that differs from the original 2006 Solid Waste Transfer and Waste Management Plan.

King County Solid Waste failed to come up with new, creative and innovative concepts to challenge and examine the 2006 Solid Waste Transfer and Waste Management Plan. Rather, upon review, King County Solid Waste is continuing to push through with its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan, but in part to determine if changes could be made that could reduce future expenditures.

A third party, independent review is necessary given King County Solid Waste's lack of innovation and desire to continue with only a minor variation of the Base Plan (possibly phase North King County). An independent review happened with the original 2006 Plan and therefore it is important to do so now, especially given King County Solid Waste's position. Had King County Solid Waste demonstrated they were thorough in their reporting and were thinking outside the box, it may not be necessary. The Review has shown differently and therefore an unbiased, independent, third party assessment is required.

Upon issue of the DRAFT Review, public perception is such that Solid Waste is pushing its agenda through at any expense.

Review Lacks Flexibility

King County Transfer Station DRAFT Plan Review lacks flexibility and did not pursue this approach in the Review.

King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not been fully analyzed and it is an example of King County Solid Waste lack of flexibility and creativity in addressing issues. Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Do not let ideal transfer station features, based on dated Transfer and Waste Management Plan, decide the future size and use of new transfer stations. Rather, the approach King County Solid Waste should take is: what can be added to existing transfer stations to mitigate solid waste and transfer matters? It is possible to provide similar services at the various transfer stations, but it requires King County Solid Waste to be innovative and flexible on how each transfer station will accomplish it.

If an existing transfer station is lacking then what can be done to mitigate the shortcoming? Can services and technologies at existing facilities be installed to provide similar services throughout transfer stations? Is it necessary for each facility to compact or have disaster storage? What can be done to alleviate these sorts of issues? The Transfer Station Draft Plan Review fails to address these issues as well as address the use of technology and policies to enhance existing sites.

The issue of direct haul should be thoroughly revisited and re-explored again. Cedar Hills had a rate break with direct haul in the past. It was an effective incentive. Direct haul can extend the life of existing transfer stations and address peak period demands. Direct haul has significant impacts to capacity and transfer stations in South King County.

All transfer stations do not need to be the same throughout King County. King County Solid Waste does not need Super-Sized Transfer Stations at every location. Not every transfer station is critical to the eventual removal of waste out of King County. There is existing excess capacity in the system that will satisfy near, midterm and future solid waste requirement.

Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 - 2028. This affects the Houghton Transfer Station and Bellevue. This issue is a short term problem and therefore warrants a short term solution. If cities do not renew their Inter Local Agreement and King County Solid Waste continues with the 2006 King County Solid Waste Transfer Plan, then there are fewer people to share the capital costs associated with the transfer stations.

Solid Waste is jamming new transfer stations down the public's throat at their expense. If transfer stations are overbuilt it is a waste to rate payers.

Review Does Not Address Timing

In 2004, when Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense.

Since that time, parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. More capacity has been created at Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted. The King County Transfer Station DRAFT Plan Review indicates differently and the above must be addressed.

What is the hurry? Do it correctly. Do it once and do it right.

Be reasonable. Do not overbuild. Listen to the communities. Be innovative. Be flexible.

Solid Waste Transfer and Waste Management is an important issue, but if not done correctly mistakes are very costly.

Submitted
Eleanor Parks

IMG_VERIFY: ASX

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 10/30/2013 1:27:56 PM

From: Eleanor Brekke <eleanor@brekkeproperties.com>
Sent: Monday, February 03, 2014 2:52 PM
To: Yates, Diane
Cc: McLaughlin, Pat; Natalie Quick (natalie@nataliequickconsulting.com)
Subject: FW: KC Transfer Station Plan
Attachments: Ltr Exec KC Transfer Station Plan 02032014.pdf

Dear Ms. Yates,

Please incorporate my attached letter into the Draft Transfer Plan Review Report comments.

Thank you,

Eleanor

*Eleanor Brekke
Brekke Properties
PO Box 287
Medina, WA 98039
425.451.1511 tel*

From: Eleanor Brekke
Sent: Monday, February 3, 2014 2:48 PM
To: 'kcexec@kingcounty.gov'
Cc: 'sung.yang@kingcounty.gov'; 'pat.mclaughlin@kingcounty.gov'; Natalie Quick (natalie@nataliequickconsulting.com)
Subject: KC Transfer Station Plan

Dear King County Executive,

Please see attached letter for your consideration.

Respectfully submitted,

Eleanor Parks

*Eleanor Brekke
Brekke Properties
PO Box 287
Medina, WA 98039
425.451.1511 tel*

BREKKE PROPERTIES
POST OFFICE BOX 287
MEDINA, WASHINGTON 98039

PHONE (425) 451-1511
FAX (425) 451-9663

February 3, 2014

The Honorable King County Executive
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear King County Executive,

As owner / operator of several properties in and around Auburn totaling more than 170,000 sq. ft. we have serious concern about the possible new \$127M North Auburn Transfer Station near West Valley Highway.

We submit this letter as part of the King County Transfer Station Plan public comment period.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that **an expanded transfer station at the current Algona site is the clear path forward.**

Our firm also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **why not expand at Algona?**

The path forward that is most viable for the County, for the community and for fiscal responsibility is **an Expanded Algona Station.** Here's why:

- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station.

To maximize cost effectiveness and regain the trust of the entire South King County community, we urge you to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of an expanded Algona transfer station as part of the EIS.**

We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,



Eleanor Parks
Brekke Properties

CALDWELL JENNIFER

From: jennifer caldwell <gincaldwell@yahoo.com>
Sent: Wednesday, October 30, 2013 9:41 PM
To: Yates, Diane
Subject: Auburn Waste Site

Good Morning,

I am concerned about the dump site that is being considered near my house in Auburn. Some of the any concerns include the many infestations of rats and other creatures that the trash will bring. This is a clean neighborhood with many families just a few feet away. I don't understand how the city would want to jeopardize our health let alone our children's. One of my other concerns of the dump site is the de-value of our homes. My family and I moved to this beautiful neighborhood for the nice homes and clean streets, we enjoy having the peaceful view of Washington without the smells of trash that others will bring. We also enjoy the fact that we do not have to hear the dump trucks at all hours of the night especially since I have sensitive medical issues that require a certain amount of hours of sleep. This was due to a major injury while serving this country in the US Navy. My proposal along with my neighbors is to keep the Algona trash site where it is not right next door to homes and that will bring unneeded pests and de-value our neighbor hood, as well as bring more heavy noisy traffic at more hours of the early morning and night.

Please consider our children, health, neighborhood and future

V/R

Jennifer Davidson
29620 58th Place S
Auburn WA

From: marilyncaretti@comcast.net
Sent: Saturday, February 01, 2014 10:22 PM
To: Yates, Diane; kcexec@kingcounty.gov; King County Council; von Reichbauer, Pete; Upthegrove, Dave; planning@kentwa.gov; permitcenter@auburnwa.gov
Subject: Fwd: - Transfer Station Site West Valley Highway Concern for Air Quality

To King County and the City of Kent

This communication requests further study on the possible selection for a new transfer station at 28721 West Valley Highway
We live on West Hill This is a nice area and the thought of decaying garbage wafting up the hill is nauseating. I know that we will get the odor because when Smith Brothers Dairy had cattle down in the valley it was really ripe at times.. There are a lot of nice homes on the west hill and I know that my neighbors will not enjoy the smell of rotting garbage any more than I will.

We recycle everything up here and would appreciate more focus on recycling rather than than just dumping into a transfer station..
Our garbage goes in yard waste to be composted, the trash goes in another can for re-purposing and the glass in yet another
We have pick up days for them.It makes no sense to shove more garbage into a transfer station when we are so careful up here to handle ours.

What with all the increased traffic up 272nd and the air quality what it is at times we don't need yet another problem.
If you must have a transfer station somewhere put it in an area where people are not doing their best to recycle and re purpose their trash, yard waste and garbage Hopefully in a less populated area. We are doing our best to recycle up here
I think you are going to have a large area of people very upset with your decision if you put this transfer station in the area in the proposal Published by King County. I hope you will consider the issues raised in this communication I believe I speak for the neighborhood on these issues.

Thank You
Marilyn Caretti
4604 Somerset Ct
Kent, WA 98032

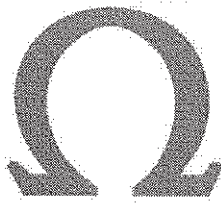
From: SWD, WebSite
Sent: Monday, October 14, 2013 2:21 PM
To: SWD, WebSite
Cc: Yates, Diane; Gaisford, Jeff; Severn, Thea
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Joanne Colman
ADDRESS: Auburn, WA 98001
EMAIL:
COMMENTTYPE: Request
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: King County does NOT need to spend nearly \$80 Million of our tax dollars to build a new transfer station at the site on West Valley! The County budget is already so strapped that you can't even maintain or repair our roads! Please select alternative DDD and either just remodel the current site in Algona at a fraction of the cost or leave the Algona site as is!
IMG_VERIFY: Red

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 10/14/2013 2:20:58 PM



Omega
Riggers & Erectors
Since 1983

COTTER MIKE
(OMEGA USA)

October 23, 2013

Attention: To Whom it may concern

Subject: Transfer Station

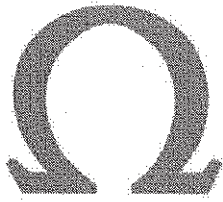
Gentlemen,

Omega, FONPEE, and all of the associated companies here are deeply concerned about the possibility of this new transfer station being built here in Auburn. Below are some of the highlights that should be considered. I have spent and continue to spend several million dollars to develop my property in this area, just south of the proposed area. And it is very upsetting that all of my hard work will be destroyed by this new facility, when there is already an existing transfer station within a couple miles of here. I know this is not your money that is being spent and you probably don't have a home or business in the immediate vicinity but it effects this area very negatively.

Transfer Station Plan Review Comments

Algona expansion options need to be explored

- King County needs to disclose it already owns adjacent Algona land parcels in report. This land was purchased to preserve expansion options for Algona in June 2012.
- Adjacent King County land can be expanded onto and used add recycling, yard waste, queuing, trailer storage and other level of service improvements in Algona.
- Report needs to address Algona expansion possibilities with or without a remodel being done.
- The report is misleading because report references no ability to expand on the Algona land that King County already owns.
- In 2001 recycling services were proposed and planned for Algona. Adding recycling in Algona is possible.
- In 2006 waste compaction was explored in Algona. Waste compaction is possible to add in the Algona remodel option.
- 200 lineal feet for waste compaction truck access is an over estimate and exceeds typical warehouse truck maneuvering areas. Waste compaction can be added in less than 200 lineal feet.
- Two Algona self-haul lanes should be studied verses just one self-haul and one yard waste lane.
- Study needs to also look at leaving one self-haul and one commercial lane in Algona. This option continues the current use.
- Yard waste service can be provided on adjacent King County land by current tenant Interwest Landscape Products or similar tenant like Pacific Topsoils. Landscape product suppliers typically receive yard waste from their customers. King County owns the adjacent land, is leasing it, and can require tenant to receive yard waste.
- Cedar Recycling which is in close proximity to Algona needs to be mentioned in report. Cedar recycling is currently receives metals, plastics and cardboard. Cedar Recycling has plans to rebuild and expand.
- Page 1 of report: "these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor." This statement is wrong and misleading.



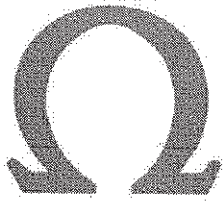
Omega

Riggers & Erectors
Since 1983

- Reference to a Redefined Criterion 8, this reference is confusing. Algonia has the ability to expand. (Page 8 of report)

Rates need to be studied further

- Report Page 8: "As one hauler noted, 'A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates'.
- Information from haulers is arguable and incomplete. The estimates, data, and opinions are limited requiring risky interpretation and misleading information.
- Cities need to have time to have direct communication, negotiations and cost estimates from their haulers and competing hauling firms.
- Individual city contract terms, costs and contract duration need to be added to report.
- Report results on hauling rates are fouled because of the mixing of North King County and South King County.
- ILA has not been signed and finalized by King County. This impacts the ability to be accurate on rates and therefore rate projections cannot be relied on.
- Hauling rates - an independent study needs to be performed. Use GBB Solid Waste Consultants, HERRERA Environmental Consultants or other consultants.
- Waste hauling to areas other than Cedar Hills Landfill needs to be part of study.
- Hauler fuel costs and greenhouse gas emissions will go down with use of alternative fuels (compressed natural gas) and increased truck efficiency. This is an increased trend and needs to be mentioned in report.
- The report needs to accurately describe the source of anticipated housing, density and population growth.
- Rate changes will have an effect on customer frequency and volumes to Transfer Stations. Rate elasticity and impacts should be incorporated into report.
- Haulers get to choose and King County does not control their use of multiple Transfer Stations which needs to be further studied and disclosed in report.
- Cities or county could make haulers use specific transfer stations.
- Haulers can change use patterns based on traffic, drive times, base locations and costs.
- Commercial hauler bases and also private transfer stations should be mapped on reports.
- Report lacks acknowledgement of private yard waste and recycling service providers which play a vital role. Providers are not mapped or referenced which play a vital role in the Transfer System.
- This report should remain in draft form until the proposed 2014 King County Solid Waste rate study is performed, critiqued and incorporated accordingly.
- A rate differential should be established for cities without extended interlocal agreements.
- Small business users of the Transfer System should be treated as a separate class in the system.
- Alternatives, costs and policies limiting self-hauling need to be studied.



Omega

Riggers & Erectors
Since 1983

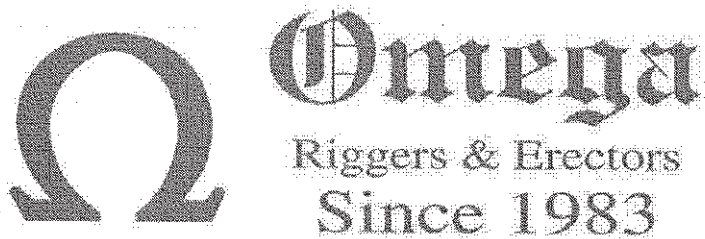
- Those using self-haul services that are not part of the KCSW system should be charged a surcharge to use the transfer system. Surcharges should be considered for Pierce County users and City of Bellevue users. City of Tacoma charges non-residents a premium to use their system.
- Self-haul tipping fees are about 50% higher in the City of Seattle and in Pierce County. King County should raise rates to match or exceed Seattle. But not doing so, King County is directing extra burden on the Transfer System.

Recycling and environmental aspects missing

- Report needs to address long term recycling trends and ability of ordinances, policies and rates to influence volumes.
- Report references to tipping floor sorting are made. No or very little tipping floor sorting is being done nor is there a specific use plan outlined by Solid Waste.
- "however, environmental analysis related to the recycling options for each alternative was beyond the scope of the review" Recycling and environmental trends are a focus and need to be in the forefront of the report.
- Bow Lake recycling just opened in October 2013 and we need to understand how this affects Bow Lake, the Transfer System, and potential future changes to solid waste and recycling services.
- Waste conversion technologies will influence the Transfer Station System, need to be incorporated into the Transfer Plan Review, and be a part of projections out to 2040.
- References to potential increase in greenhouse gases will be countered by efficiency increases and alternative fuels and fuel efficiency like natural gas.
- Potential and contemplation of Biomass processing at transfer stations needs to be incorporated into the report.
- Numerous recommendations in HERRERA Optimized Transfer Station Recycling Feasibility Study just issued in July 2013 need to be further explored, developed and incorporated. These recommendations have drastic impacts to the Transfer Station System.

There needs to be separate South King County and North King County studies done

- Data and results become skewed when too much is tied together.
- A Factoria decision should happen first and then separate studies for North and South King County.
- South King County should be granted the same wait and see recommendation as North King County. Unfair treatment to South King County.
- Flexibility is for new technologies and trends is a benefit in waiting to build new stations.
- Paired incongruent alternatives, less likely scenarios and limited alternatives are given and studied as the alternatives in the report.
- Renton should not be closed and should be studied as remaining open in the report. Multiple use options between commercial haul and self-haul should be studied for Renton.



- How can Renton and Enumclaw be better utilized and part of the plan for commercial, self-haul, recycling and yard waste? Make them part of the plan and specific to solutions and studies in South King County.
- Rural drop boxes should be noted on maps. Information and drive times are misleading without them.
- South Seattle and Drop Box not on maps. Update info on maps to include South Seattle transfer Station, Drop Boxes and Pierce County.
- Portions of City of Auburn are in Pierce County. 10% of Algona transfer station is from Pierce County. Please disclose this in the report.

Advantages of waiting on to build more transfer stations need to be incorporated

- Flexibility is gained and new technologies and trends can be incorporated.
- Capital costs and other funds are saved by rate payers.
- Ability to phase a transfer plan advantageous and provides a more accurate delivery of future needs.
- Extending life of currently functioning and existing facilities is realistic alternative.
- Cedar Hills Landfill is near capacity and is projected close before 2040. It was first set to close in year 2012, then 2018 and now 2025. Cedar Hills closing affects Transfer Station System and needs to be part of this report.
- Wait and see the data and learning from Bow Lake and Factoria before building in South King County and North King County. This will result in a better Solid Waste System.
- History of incorrect estimates is a risk factor and waiting mitigates this risk.
- New recycling (carpet, mattresses and other items) will influence Transfer Station System requirements. Waiting will allow future facilities to be adjusted.
- Waste to Energy and Biomass Processing plays a part of overall plan, needs and impacts to Transfer Stations. These items need to be incorporated into the report.
- Transfer Stations are an overall antiquated approach that we should be cautious to invest in.

Future landfill limitations and out-of-county transport needs to be incorporated

- Update life span of Cedar Hills
- Inner modal pairing with future transfer stations
- ILA signed/not signed.
- South King County as the only potential to provide a transfer station with intermodal feature included. Determination of specific advantages and system costs of an intermodal transfer station are needed. It is short sided to not have an intermodal facility plan in place before siting a new South King County transfer station.

Policy decision options and impacts

- Mandatory recycling for new items will change the results of the study.



- Bulk curbside pick-up can be done and will limit self-haul demands and therefore transfer station traffic volumes.
- Zero Waste Initiatives will change system requirements.

Interlocal Agreement impacts

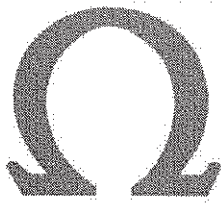
- Disproportional impacts are experienced and need to be corrected because of cities choosing not to participate in the ILA.
- Existing capital costs and bonds should be paid off before Bellevue and other cities withdrawal from the solid waste system.
- Cities electing not to be part of the current ILA past 2028 should be given a firm deadline until the end of 2014 to lock in their decision. A revised Transfer System plan should not be adopted before this deadline is established.
- Cedar Hills Landfill has the ability to add some direct haul. The specific direct haul capacity needs to be disclosed in the report. Direct haul can partially ease the burden on transfer stations.
- Cedar Hills Landfill can become a Transfer Station site now or at the projected closing date of 2025. This option needs to be studied.

Equity and Social Justice concerns

- Equality should be given in the wait and see approach to both South King County and North King County.
- Siting a new transfer stations close to Bow Lake creates South King County as dumping ground of the majority of King County's waste.
- The number of transfer stations proposed falls disproportionately on the single community of South King County.
- Report reference to Level C service equating to failure does not provide appropriate context.
- Year, frequency and in what areas of King County exceeding Level C needs to be provided in the report.
- Any data or changes made to this to this report needs further public comment.
- A projected bias is in this report and a third party needs to review this study.
- Use of the 2027date is misleading and should be post July 2028 when Bellevue drops out of ILA.
- Please remove the overall bias by Solid Waste to build new transfer stations.
- Please present the report with more solutions and options available to not build new transfer stations.
- Similar to Factoria, the cities of Algona and Auburn have land use, zoning and permitting issues with the siting of a new transfer station.

Time constraint concerns

- SWAC and MSWMAC Advisory Committees expressed concern about the limited time to property study, assimilate new information and comment on this report.
- Cities (City Managers, Mayors and City Staff) expressed concern about the limited time to property study, assimilate new information and comment on this report



Omega

Riggers & Erectors
Since 1983

- Public expressed concern about the limited time to property study, assimilate new information and comment on this.
- King County RPC expressed concern about the limited time to property study, assimilate new information and comment on this report.
- The timing the release of this draft report release does not allow cities and groups time to present this report as an agenda item and take action given a commonly used set schedule of meeting times of various interested entities and groups.
- Time should allow for a 3rd Party independent study and review to be done. Last independent review was done in July 2007.
- 2013 Solid Waste Plan remains in draft form and needs to be finalized before revising the transfer station plan.
- Transparency of dates as it relates to level of service passing/failing grades needs to be made in the report. References are made to system failures without specific dates or locations of failures. A matrix or graph system needs to more clearly disclose and present information. Results and data are presented in a misleading way.
-

Accuracy concerns with the report

- Page 10, "In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available". This is not appropriate to do before spending several \$100 million on a transfer station plan.
- Tonnage forecasts go up and down in the report in multiple areas. Please reference the data to support this change. This data is different than past studies that were published by Solid Waste. See Page 11 in report.
- Conclusions and recommendations on page 35 are not supported by the data.
- References to low grades and systems failure is based on minor portions of data and misleading. Report conclusions of long drive times are draw by taking from furthest areas and not addressing near by facilities such as King County Drop Boxes, City of Seattle facilities and Pierce County facilities which boarder King County and impact the solid waste system.
- Report categorizes failure as a C with exceeding level of service over 10% of the operating hours. The determination and label as failure is misleading to the reader.

Sincerely,

Mike Cotter

Omega Riggers & Erectors, Inc.
Fonpee, LLC,
Omega USA Inc.
Omega Industrial Contractors, Inc.
Omega General Contractors, LLC
Omega General, Inc.
Omega Equipment, Inc.

Page | 6

3705 W. Valley Hwy.* Auburn, WA 98001 * 253.804.6000 FAX 253.804.4000

From: S Cowan <sgnsc@comcast.net>
Sent: Sunday, January 26, 2014 3:48 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Cc: cindy.nonorthauburndump@gmail.com
Subject: King County Auburn Transfer Station Proposal

I am writing out of concern for both the financial and environmental impact of building a \$127 million transfer station at the North Auburn site.

It seems to me that a location on or near the existing Algona transfer site would be more suitable because it is not surrounded by residential neighborhoods. The noise, traffic, odors resulting from the transfer station suggest that a non-residential area is more suitable. Why is King County not listening to input from residents in the area?

Regarding the cost, I can't imagine building a transfer station for more than \$35 million. The City of Tacoma was able to do it, why can't King County? I've recently read where the cost of utility services for King County residents has increased roughly 10% a year and will continue to do so. Why is it King County is disregarding the cost of these services to the residents?

Sincerely,
Sally Cowan
6009 S 298 PI
Auburn, WA 98001

From: kathleen cummings <kathleenmcummings@hotmail.com>
Sent: Thursday, October 31, 2013 11:04 PM
To: Yates, Diane
Subject: Draft Transfer System Plan Review

I would like to address the issues before the Solid Waste Division concerning the siting options for a transfer station in south King County.

I am in full support of re-thinking the model and looking at all options. I endorse Alternative DDD which would remodel the existing Algona site. My understanding is the cost of this(\$7 million) is considerably less than the construction of a new facility(\$70 plus million). I believe Alternative DDD is a fiscally responsible option that would meet the current and future needs for south King County. The Algona site has served the area for decades and a remodel and upgrade would only enhance its ability to do so.

Thank you for this opportunity to comment.

Kathleen Cummings

From: kathleen cummings <kathleenmcummings@hotmail.com>
Sent: Monday, January 27, 2014 7:42 PM
To: Yates, Diane
Subject: FW: Say No to the North Auburn Garbage Site

Say No to North Auburn site

From: kathleenmcummings@hotmail.com
To: kcexec@kingcounty.gov; dianeyates@kingcounty.gov; council@kingcounty.gov
Subject: Say No to the North Auburn Garbage Site
Date: Mon, 27 Jan 2014 20:21:17 -0700

As a King County resident who lives in the west hill neighborhood of Auburn, I am in opposition of the siting of a news transfer station at 28721 West Valley Highway. To maximize cost effectiveness, environmental sustainability and flexibility, I urge King County to study other transfer station options.

In particular, I would ask that the County more fully evaluate the renovation and expansion of the existing Algona transfer station. County evaluations show that improving the Algona site would cost about \$8 million instead of the \$127 million budgeted for the north Auburn site. Additionally, the County already owns 16 acres of undeveloped land adjacent to the existing site.

Within the last seven years, the County has spent over \$300 million to build new transfer stations. These stations more than meet the current demands. Let's take some time to consider all options and what makes the most sense- both financially and environmentally.

Thank you for your time and consideration. I look forward to hearing future updates.

Sincerely

Kathleen Cummings
6006 S 300th St
Auburn WA 98001

From: jeremy delmar <jeremy_delmar@hotmail.com>
Sent: Monday, January 27, 2014 11:24 AM
To: Yates, Diane; kcexec@kingcounty.gov; King County Council
Subject: We Oppose the North Auburn Garbage Site!

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Jeremy and Coleen DelMar
5247 S 285th St
Auburn, WA 98001

DIZON ANNABELLE

VE OFFICE

January 30, 2014

Dow Constantine, County Executive
King County Chinook Building
401 5th Avenue, Suite 800
Seattle, WA 98104

SUBJECT: _____
ACTION
RESPONSE FOR EXEC. SIG.
EXECUTIVE FOR EXECUTIVE
REVIEWED BY _____
FYI.

Dear Sir:

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline, and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem—now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn—and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thank you very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Annabelle Dizon
30103 57th Place South
Auburn, WA 98001

Cindy Flanagan
6012 S 298th Place
Auburn, WA 98001

Diane Yates, Intergovernmental and Legislative Liaison
King County Solid Waste Division, Director's Office
201 So. Jackson St., Ste. 701
Seattle, WA 98104

Re: October 9, 2013 Draft Transfer Plan Review Comment Submission

Dear Ms. Yates:

This is an official comment to be included in the final version of the Transfer Plan Review as per Ordinance 2013-0258 Section B.

First, my compliments go out to the Solid Waste Team for your diligent effort to accomplish such an enormous task. Also, thank you to King County for choosing to include public comment as an important component of this Transfer Plan Review. As a resident of King County, I appreciate and embrace the opportunity to be involved and work together to create a waste management system that can meet the needs of today's King County, and even more importantly is built based on a comprehensive plan that allows us to move into the future with a solid strategic plan.

An in-depth independent review is required to study and incorporate recycling and environmental trends into our strategic plan.

In 2006, when the *Solid Waste Transfer and Waste Management Plan* was created, there was little to no planning for waste diversion such as recycling. Since then, we have incorporated more recycling in our facilities (almost 35%); and, much has improved in waste diversion technologies in the past seven years since the Strategic Plan. The Transfer Plan Review is an opportune time for us to re-evaluate our strategy and reshape our thinking of using waste as a resource. We need to identify adequate alternatives that will divert waste and will eventually eliminate waste going into landfills. We have a responsibility to research and integrate a planning process that identifies suitable alternatives to decrease and even eliminate waste in landfills. An independent study is needed.

Cedar Hills Landfill was proposed to close in 2014, then extended to 2018, and now is projected to close in 2024. Our Transfer Plan is to provide an operational transfer system to 2040. What will we do for the 15 years when Cedar Hills, King County's only landfill closes? We need to identify adequate alternatives

to 'exporting to another landfill.' Our Transfer Plan does not address this key component and further review is required.

Current transfer plan is outdated and is not the economical choice.

We need to adjust our Strategic Plan so that it is updated and incorporates more proactive measures to handle waste as a resource. Spending \$300 Million in capital costs to push through the final three transfer stations, which may not provide the best design and service is a poor use of taxpayer and rate payer dollars.

Time Constraints are prohibiting stakeholders from contributing to review and prohibiting key criteria from being studied. The time frame and phasing of the transfer plan need to be adjusted.

The Draft Transfer Plan Review was released on Wed., October 9th. Key stakeholder groups (Regional Policy Committee and Sound Cities Association) did not receive the draft in a timely manner and these groups do not meet during the comment period. How can these key stakeholders provide critical feedback to the review when their caucuses do meet?

In the draft, it states that "environmental analysis related to the recycling options for each alternative was beyond the scope of the review." Recycling and environmental trends are a focus and need to be in the forefront of the report. KCD should incorporate a time line that allows for waste diversion and waste to energy analysis.

Separate studies of Houghton and South King County are required.

The review's alternatives always pair South King County (Algona) and Northeast County (Houghton) together. As a result, data is skewed.

Algona expansion options must be explored.

In all discussions, KCSWD has never disclosed that it already owns the adjacent Algona land parcels—this information should be included in the review. The only mention of the Algona site is that King County should "Close the Algona transfer station in 2020, making that property available for other use." As well, the review states "these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts..." This statement is wrong and misleading.

A remodel of Algona including expansion on adjacent property should be evaluated. The remodel should include one lane of commercial haul, one lane of self-haul and one lane of yard debris.

In 2001, recycling services were proposed and planned for Algona. Adding recycling to Algona is possible. In 2006, waste compaction was explored in Algona. Waste compaction is possible to add in the Algona remodel option.

Commercial haul data needs to be gathered and analyzed separately for each transfer station site. An independent review of commercial for each facility (especially South King County and Northeast) is needed.

The commercial haul data is insufficient and requires independent review. KCSWD's major argument against alternative D*** Algona remodel and Houghton is that commercial hauling rates would increase; however, the data is arguable and incomplete because the estimates, data and opinions are limited. The SWD is using haphazard interpretation and misleading information.

"We must stress that these are only rough projections based on the limited information available currently. A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates..." Even the haulers recognize that more review is required. An independent review would allow for thorough unbiased data collection and study.

In closing, SWD needs to develop a comprehensive transfer and waste management plan. Not identifying alternatives to Cedar Hill landfill and building transfer stations that cater to the landfill is a very limited plan. Landfill alternatives and zero waste alternative—increased recycling and waste diversion—must be considered as the primary component in the review. As well, independent sites, such as Algona, must be reviewed and all details of the facilities need to be presented transparently (i.e. King County owning adjacent lands around current Algona site). An in-depth independent review is needed. We want to build a transfer and waste management plan that is economically and ecologically sound.

Sincerely,

Cindy Flanagan

From: cindy flanagan <camcalcin@hotmail.com>
Sent: Monday, February 03, 2014 4:19 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: No North Auburn Waste Transfer Station

February 3, 2014

To King County Executive Dow Constantine, King County Council, and Solid Waste Division:

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Cindy Flanagan
6012 S 298th Place
Auburn, WA 98001

February 3, 2014

HALL GUY

The Honorable King County Council
516 Third Avenue, Room 1200
Seattle, WA 98104

(A & G MACHINE)

Dear King County Councilmembers,

A & G Machine is a proud Auburn business that manufacturing complex machined parts and mechanical assemblies for the Aerospace and Homeland Defense Industries. As such, we have serious concern about the possible new \$127M North Auburn Transfer Station near West Valley Highway.

We submit this letter as part of the King County Transfer Station Plan public comment period.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that **an expanded transfer station at the current Algona site is the clear path forward.**

Our business also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **why not expand at Algona?**

The path forward that is most viable for the County, for the community and for fiscal responsibility is an **Expanded Algona Station**. Here's why:

- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station

To maximize cost effectiveness and regain the trust of the entire South King County community, we urge you to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of an expanded Algona transfer station as part of the EIS.**

We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,


Guy Hall

A & G Machine

2-3-14

HARKNESS MARIE-ANNE

29780 53rd Avenue
Auburn, WA 98001
October 22, 2013

Diane Yates
Intergovernmental and Legislative Liaison
Director's Office
King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

Dear Ms. Yates:

After reading the review of the 2006 *Solid Waste Transfer and Waste Management Plan* (Transfer Plan) Draft report, and attending Workshop #3, I am submitting my comment to be added to the final Report.

The Draft Transfer Plan Review contains Alternative Plan D***; that alternative would be best if the following additions are made: remodel the current South King County Transfer Station located in Algona, not just for self-haul, but retaining the current self-haul and commercial haul and upgrade the Level of Service (LOS) by extending hours of operation at peak hours and adding a compactor. South King County residents recycle more, and therefore part of the remodel should be a recycling center on a portion of land adjacent to the current Algona site owned by King County (the Interwest ILL property). This property is zoned M2 Heavy Industrial which is appropriate for a recycling center and is consistent with current land use in the area.

Alternative D*** allows flexibility for future usage patterns and solid waste technologies. The cost of alternative D*** with the additions stated above is a responsible use of taxpayer and ratepayer dollars.

Sincerely,

Marie-Anne Harkness

HARVIE AMY

From: Harvie, Amy L <harviea@bsd405.org>
Sent: Wednesday, October 16, 2013 2:30 PM
To: Yates, Diane
Subject: Transfer Station

Hi Diane,

My name is Amy Harvie and I live up in the Woodbrook neighborhood. The past several months, I have made a few calls and have posted my opinion on websites regarding the Algona Transfer Station. I wanted to make sure I communicated to you as well. I **DO NOT** support having the Algona station to be transferred to the preferred site on West Valley Highway. Instead, **I support Alternative DDD which would require a remodel at the current Algona site.** It makes so much more sense to keep the transfer station where it is and add what needs to be done as opposed to starting over in a new location. Not to mention, we, the neighbors of Woodbrook and the "No North Auburn Garbage Site Group," do NOT want a garbage site in our valley.

Please take our requests into consideration and DO NOT move the Algona site but remodel it instead. This is the BEST solution ☺

Thank you for your time,
Amy Harvie

Amy Harvie
5th Grade
Somerset Elementary School

From: Holly Isaman <hisaman@comcast.net>
Sent: Saturday, February 01, 2014 2:09 PM
To: Yates, Diane; kcexec@kingcounty.gov; King County Council; von Reichbauer, Pete; Upthegrove, Dave; planning@kentwa.gov; permitcenter@auburnwa.gov
Cc: Carla & Gordon Henry; Dawn Genzlinger; Doris & Dave Wilson; Gerry Chang; Greg Pettibone; Helen & David Pepper; Jun Audar; Kris & Les Hargitt; Lillian Lahiri; Marilyn & Sam Caretti; Midori & Stanton Richard; Myla Audar; Sandy & Steve Bosley; Sharon & Josh Stevenson; Subir Lahiri
Subject: Concern for Air Quality - Transfer Station Site West Valley Highway

To King County and City of Kent:

This communication is to ask for further study on the possible selection for a new transfer station at 28721 West Valley Highway. I have reviewed parts of the proposal published by King County, and rationales for the need to expand or realign waste disposal, particularly within south county.

I would ask that concern be put forth in respect to **air quality and the geography of the Kent/Auburn Valley floor and related air dynamics**. Please go back to air quality / air flow from the days of the Smith Brothers Dairy, when cattle were housed in the Valley. I live at the crest of West Hill Kent, and have strong memories of the 80s and early 90s when the cattle were housed at that site. Air flow at certain times brought very "ripe" odors straight up the side of the hill to the neighbors to the west of that site. While not egregiously offensive, certainly transfer station odor IS. As a resident in one of these neighborhoods, I already have concern over the increasing traffic through the 272nd expansion corridor and Highway 167 and the impact that this is having on air quality in our neighborhoods. I would consider adding to that affect with odor from a transfer station to be an inappropriate addition.

One citing by the reports had to do with concern over drive time and access to current stations. I wouldn't assume that this is a challenge to many residents of the West Hill, but air quality would be. West Hill Kent residents are recyclers and would, my guess, rather see you focus efforts on "recycle, reuse, repurposing" as opposed to finding more space to shove waste.

Thank you for taking these points and my opinion into consideration.

Respectfully,

Holly Isaman
4611 Somerset Ct.
Kent WA 98032

From: Jenel Ison <isonjh@gmail.com>
Sent: Monday, January 27, 2014 7:51 PM
To: Yates, Diane
Subject: We Oppose the North Auburn Dump!

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Calvin & Jenel Ison

**JAY NATHAN
(BREKKE PROPERTIES)**

Tuesday, November 05, 2013

King County Solid Waste Division
201 So. Jackson St., Ste. 701
Seattle, WA 98104

RE: October 9, 2013 Draft Transfer Plan Review Comments

KCSW,

I request the following feedback be included in the Transfer Plan Review.

The impact to rates as they relate to estimated traffic patterns, wait times, hauler estimates and contractual obligations requires further study. "As one hauler noted, 'A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates.'"

Much of the information from haulers is incomplete and cities need time to negotiate contracts and receive accurate cost estimates from current haulers and potential competition. The report should include information on current contracts, costs and future estimates. It should be noted that the current report results may not accurately reflect actual rates due to the mixing of North and South King County rate estimates. Further, the King County ILA has not been finalized and will have significant impact on rates and projections which should be taken into consideration when producing a new, accurate report. It may be necessary to include a third party, independent study for a truly accurate report.

It should be considered in the report that Cedar Hills Landfill will reach capacity before 2040 and this could affect future rates. Further, the increasing trend towards alternative fueled vehicles and increased fleet efficiency should be included as this will have a significant impact on future cost projections. In addition, any rate changes will have an effect on customer frequency and volumes to Transfer Stations. Rate elasticity and impacts should be incorporated into report as well as the effect that the availability of multiple transfer station options and changing traffic patterns may have on use. It should also be noted that certain cities or King County itself could require haulers to use specific transfer stations.

The report lacks acknowledgement of private yard waste and recycling service providers which play a vital role. Providers should be mapped and referenced. They play a vital role in the Transfer System and the recycling lifecycle. Small business users of the Transfer System should be treated as a separate class in the system with differentiated rates, hours and ability to access stations. Alternatives, costs and policies limiting self-hauling need to be studied in the report. Additionally, self-haul tipping fees are about 50% higher in the City of Seattle and in Pierce County which could direct the extra burden on the Transfer System. The report should study the impact of less transfer station use due to raising tipping and other fees. This report should remain

in draft form until the proposed/pending 2014 King County Solid Waste rate study is performed, critiqued and incorporated accordingly.

In regards to the possible Algona site for the Transfer Station, King County needs to disclose it already owns adjacent Algona land parcels in report. This land was purchased to preserve expansion options for Algona in June 2012. The current report is misleading on this point as it references no ability to expand on the Algona land that King County already owns. Adjacent King County land can be expanded onto and used to add recycling, yard waste, queuing, trailer storage and other level of service improvements in Algona. The report should address Algona expansion possibilities with or without a remodel being done and including the 2001 recycling services and 2006 waste compaction proposals for Algona. Adding recycling and compaction services in Algona is possible, especially now that King County owns adjacent land and current estimates of 200 lineal feet are excessive for truck access.

Cedar Recycling which is in close proximity to Algona needs to be mentioned in report. Cedar Recycling is currently receiving metals, plastics and cardboard. Cedar Recycling has plans to rebuild and expand which will affect traffic at the Transfer Station. On Page 1 of report: "these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor." This statement is wrong and misleading. Algona has adjacent additional land that can be utilized and the report should be amended to clarify this point.

Separate reports for North and South King County are required. Report data and results become skewed when too much is tied together between various areas in King County. South King County should be granted the same wait and see recommendation as North King County. Unfair treatment is being applied to South King County. Renton transfer station should not be closed and should be studied as remaining open in the report and in all alternatives studied. Multiple use options between commercial haul and self-haul should be studied in the report for Renton transfer station.

How can transfer stations in Renton and Enumclaw be better utilized and part of the plan for commercial, self-haul, recycling and yard waste? Make these transfer stations part of the plan and specific to solutions and studies in South King County. Current rural drop boxes should be noted on all report maps. Report information and drive times are misleading without rural drop boxes included. Paired incongruent alternatives, less likely scenarios and limited alternatives are given and studied as the alternatives in the report. Other alternatives need to be evaluated and expanded on. Update information and maps to include South Seattle Transfer Station and Pierce County Transfer Stations. Customers do and will take advantage of shorter drive-times and locations of nearby transfer stations outside the ones managed by KCSW. Significant portions of City of Auburn are in Pierce County. Additionally, 10% of Algona transfer station use is from Pierce County. Please disclose this material fact in the report. Please also study the impacts on transfer system capacity when various limitations and disincentives are used with Pierce County residents and cities.

The number of transfer stations proposed falls disproportionately on the community of South King County. Similar to the City of Bellevue with the Factoria Transfer Station, the cities of

Algona and Auburn have land use, zoning and permitting issues with the siting of a new transfer station. This needs to be specifically mentioned in the report in order to present information fairly and accurately. The City of Bellevue received greater influence, participation and involvement from King County. Equality must be granted to other impacted cities. Any additional data or other changes made to this report between October 23, 2013 and November 27, 2013 need to be given further public comment. Please remove the overall bias by KC Solid Waste to build new transfer stations. Other functionality and service alternatives were avoided by KC Solid Waste. Please present the report with more solutions and available options that do not build new transfer stations. Study of the retention and repair of the transfer stations was a major component of Ordinance 2013-0258 which required this report to be done. Committees, stakeholders and the public were frustrated by the control of the data, selective presentation of options and documentation of accurate feedback by King County Solid Waste. A projected bias is in this report and an independent third party needs to review this study. A third-party independent study will provide additional ideas, verification of data and equitable treatment to all interested parties.

Further consideration should be given to allowing more time for new technologies and future trends to emerge which can be incorporated into the system to increase efficiency, environmental impact and useful life. Additionally, the rapid expansion of the King County population will affect future needs and the ability to wait is advantageous in our ability to cope with evolving requirements. King County should wait and see the data and learning from Bow Lake and Factoria before building in South King County and North King County. This will result in a better Solid Waste System which then can be sized and outfitted to meet future needs. Also to be noted are new trends in recycling (carpet, mattresses and other items) which will influence Transfer Station System requirements. Because mandatory recycling for new items should and will likely be a part of future policies this needs to be mentioned in the report. Waiting will allow future facilities to be adjusted to new recycling products and trends.

I would also like to note the following inaccuracies in the current report...

1. On Page 10, "In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available". This is not appropriate to do before spending several \$100 million on a transfer station plan.
2. The solid waste tonnage forecasts go up and down in the report in multiple areas. Please reference the data to support this change. This data is different than past studies that were published by King County Solid Waste. See Page 11 in report.
3. The conclusions and recommendations on page 35 are not supported by the data.
4. References to low grades and systems failure is based on minor portions of data not meeting standards and is presented in a misleading manner. Report conclusions of long drive times are drawn by taking from furthest areas and not addressing nearby facilities such as King County Drop Boxes, City of Seattle facilities and Pierce County facilities which border King County and impact the King County Solid Waste System.
5. Report categorizes failure as a C with exceeding level of service over 10% of the operating hours. The determination and label as failure is misleading to the reader.

6. Report reference to Level C service equating to failure does not provide appropriate context. A wait 10% or more of the time should not be considered failure.
7. The level of service grading scale with wait times is bias toward presenting failure. System grading needs to be equally distributed over the range. The use of letter grades also needs to be changed to numbers or other indicators to present data in a fair and understandable manner.
8. Year, frequency and in what areas of King County exceeding Level C needs to be provided in the report. A systematic presentation of this data needs to be make in this report.
9. Travel times vary by time of day, traffic patterns and other factors. These important variables need to be shared in this report.
10. Use of the 2027 date is misleading and should be post July 2028 when Bellevue drops out of ILA.
11. Systematic and incremental analysis of impacts, capacities and functionality was lacking in the report and falls short of the intentions of the King County Ordinance 2013-0258.

Please include my comments in the ongoing discussions.

Sincerely,

Nathan Jay
njay22@gmail.com

From: dottiejohnson1@comcast.net
Sent: Thursday, January 30, 2014 3:56 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: South King County Transfer Station / Auburn

I am writing to oppose the new transfer station that has been proposed for 28721 West Valley Highway in Auburn. I oppose this site for 3 reasons:

1. The county's own evaluation study determined that the North Auburn site is the least desirable of all possible South King County alternatives.
2. This site is important to migratory trumpeter swans and other birds and tends to flood every year.
3. The county already owns 16 acres of undeveloped land adjacent to the current Algona facility. By your own evaluation, it would cost approx. \$8 million dollars to remodel/enlarge/improve the current site rather than the \$127 million budgeted for the new North Auburn site.

What bothers me most with the way the Solid Waste division has pushed this site is

- (1) it totally disregards your own county evaluation and recommendation.
- (2) I continue to hear that taxes must be raised and new revenue generated to support critical county programs. If the county is willing to pay \$119 million dollars more than needed on this transfer station then it's not really a matter of needing more revenue. It's more mismanaging the monies you already have.

The decision to build a new transfer station rather than improving the current Algona station reflects very poorly on the county.

Dottie Johnson
28225 51st PI S
Auburn WA

From: JKdrummer <jkdrummer@yahoo.com>
Sent: Monday, January 27, 2014 4:18 PM
To: kcexec@kingcounty.gov
Cc: King County Council; Yates, Diane; von Reichbauer, Pete
Subject: Stop The Dump in my backyard!

Though this is but another form letter, I stand behind every word I'm asking you to read one more time. This behemoth of a facility is too close to our kid's school right up the hill! Pete, you've been to Meredith Hill before, think about our kids breathing in diesel emissions all day 180 days a year after year.

Jim Knapp
Auburn

To my local government:

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

The Knapp Family
23 year resident of the West Hill.

LAHIRI SUBIR

From: Lahiri, Subir [<mailto:subir.lahiri@boeing.com>]

Sent: Monday, February 03, 2014 8:31 AM

To: Yates, Diane; Holly Isaman

Cc: Carla & Gordon Henry; Dawn Genzlinger; Doris & Dave Wilson; Gerry Chang; Greg Pettibone; Helen & David Pepper; Jun Audar; Kris & Les Hargitt; Lillian Lahiri; Marilyn & Sam Caretti; Midori & Stanton Richard; Myla Audar; Sandy & Steve Bosley; Sharon & Josh Stevenson; King County Council; kcexec@kingcounty.gov; von Reichbauer, Pete; Upthegrove, Dave; planning@kentwa.gov; permitcenter@auburnwa.gov

Subject: RE: Concern for Air Quality - Transfer Station Site West Valley Highway

Diane,

Please add Lillian Lahiri and myself to the list of extremely concerned residents regarding the potential location of the new transfer station in Kent.

Thank you.

Best Regards,
Subir Lahiri

From: Li Peipei <peipei5435@gmail.com>
Sent: Thursday, January 23, 2014 3:56 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: We Oppose the North Auburn Garbage Site!

Hello,

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made.

There is no need to be hasty, rush ahead and build yet another multi-million

dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Yu diao and Peilin Li

From: Jon Lindenauer <jmlstat@comcast.net>
Sent: Saturday, February 01, 2014 9:14 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: Opposition to 28721 W. Valley Hwy, Auburn site and SWD Transfer Review Plan

My name is Jon Lindenauer. I'm a professional Statistician. I live at 29216 58th Place South, Auburn, WA. I am here to comment on the King County Solid Waste Transfer Review Plan.

I'm asking the King County Councilmembers to please support an independent review of the KCSWD Transfer Review Plan. The current review is woefully lacking in both content, creativity and accuracy. I'm asking for the following to be considered in the review plan.

1. Options for a remodel of the Algona Transfer Station. Include adding a compactor, this was approved in 2006. Add recycling at Algona (approved in 2001). King County owns the property adjacent to the Algona site. A remodel would cost less than \$10 million dollars. A replacement station would cost \$127 million.
2. Option to divert Federal Way waste to Bow Lake; which would support a remodel at Algona.
3. Option for commercial hauling and self-hauling. Incentives for direct commercial hauling to Cedar Hills and use of off-peak time for self-hauling.
4. Further studies of alternatives when the Cedar Hills Landfill closes in 2024.
5. Further studies of zero waste, waste diversion and recycling and their impact on our future waste transfer plan to sustain us until 2040. We are in a waste management revolution right and the Transfer Plan needs to be updated to reflect this change. Sorting at the Source, such as at curbside should be included. Businesses like Starbucks and cities like Auburn have made great strides in sorting out waste before garbage pickup. Collecting garbage and sorting on a floor is an outdated method. Rushing ahead with an outdated plan is wrong. We need further independent review.

I ask for independent review because I believe it is a conflict of interest for KCSWD to have the final say on the Transfer Review Plan.

I oppose the 28721 West Valley Hwy, Auburn, WA transfer station site alternative. This site will negatively impact over 5000 residents of North Auburn.

Thank you for listening.

From: Chet McKnight <chetmcknight@me.com>
Sent: Friday, January 24, 2014 9:02 AM
To: wosborne@auburnwa.gov; kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: We Oppose the North Auburn Garbage Site!

I am opposed to the 28721 West Valley Highway South, Auburn, WA transfer station site.
Please do not let this happen!

From: Elizabeth Meldrum <meldrum.elizabeth@gmail.com>
Sent: Wednesday, January 29, 2014 1:28 PM
To: Yates, Diane
Subject: We Oppose the North Auburn Dump!

Diane Yates,

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Elizabeth Meldrum
29636 57th Pl S,
Auburn, WA 98001

MESINA MARIBEL

MARIBEL MESINA
4523 40TH AVE SW #B
SEATTLE, WA 98116
(760) 805-5829

October 23, 2013

Diane Yates, Intergovernmental and Legislative Liaison
King County Solid Waste Division, Director's Office
201 So. Jackson St., Ste. 701
Seattle, WA 98104

Re: Draft Transfer Plan Review Comments

Dear Ms. Yates:

Please ensure that the following feedback is documented in the final version of the Transfer Plan Review report, and for the feedback to be incorporated into the Transfer Plan Review Report.

- King County Cities need to have time to directly communicate, negotiate and receive cost estimates from both haulers and competing hauling firms.
- "As one hauler noted, 'A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Taking these variables into account may significantly affect the cost estimates.'"
- The information from haulers is incomplete and arguable. The data, estimates, and opinions are limited therefore requiring uncertain interpretation and misleading information.
- The King County ILA has not been finalized and signed by King County. This greatly influences the ability to be accurate on rates and therefore rate projections cannot be relied on.
- Each city's individual commercial hauler contract terms, costs and contract duration data needs to be incorporated into the report.
- Report results on hauling rates are fouled because of the combining of North King County and South King County hauler rate estimates.
- Waste hauling to areas besides Cedar Hills Landfill need to be a part of study and how it effects rates because Cedar Hills Landfill is estimated to reach capacity before the year 2040.
- Cost of fuel and greenhouse gas emissions with haulers will go down with use of alternative fuels and increased truck efficiency. An increased trend and needs to be noted in the report.
- Report needs to accurately describe the source of density, population growth and anticipated housing.
- Third party, independent studies need to be conducted on hauling rates. GBB Solid Waste Consultants, HERRERA Environmental Consultants or other consultants are examples of those who can conduct these studies.
- Commercial haulers choose and King County does not control their use of multiple Transfer Stations which needs to be further studied and discussed in the report.
- King County and King County cities could make haulers use specific transfer stations which need to be studied.

- Commercial haulers can alter patterns based on traffic, base locations, drive times and costs which needs to be deliberated in the report or by a 3rd party traffic consultant.
- Rate changes will have an effect on customer frequency and volumes to Transfer Stations. Rate elasticity and impacts should be incorporated into report.
- The report lacks acknowledgement of private yard waste and recycling service providers which play a vital role. Providers should be mapped and referenced. They play a vital role in the Transfer System and the recycling lifecycle.
- Small business users of the Transfer System should be treated as a separate class in the system with separate rates, hours and access station ability.
- Self-haul tipping fees in the City of Seattle and Pierce County are about 50% higher. King County should increase rates to match neighboring jurisdictions. King County, by not raising tipping fees is directing extra burden on the Transfer System. Report should study the impact of less transfer station use due to raising tipping and other fees.
- Report should remain in draft form until the pending/proposed 2014 King County Solid Waste rate study is performed, critiqued and merged accordingly.
- Costs, policies and alternatives limiting self-hauling need to be looked at in the report. Costs, policies and alternatives limiting self-hauling need to be looked at in the report.
- Private transfer stations and commercial hauler bases should be displayed in maps on the report.
- King County land that is adjacent can be expanded onto and used to add recycling, yard waste, queuing, trailer storage and other level of service developments in Algona.
- The Report needs to address Algona growth possibilities with or without a remodel being done.
- Report is misrepresentative because report references no ability to expand on the Algona land that King County already owns.
- King County should disclose it already owns adjacent Algona land parcels in report. The land was purchased to preserve expansion options for Algona in June of 2012.
- In the year 2006 waste compaction was explored in Algona. Waste compaction is possible to put in the Algona remodel option. Update Algona remodel costs to include compaction.
- 200 lineal feet for waste compaction truck access is an over estimate and surpass typical warehouse truck maneuvering areas. Waste compaction can be added in Algona in fewer than 200 lineal feet.
- Two Algona self-haul lanes should be studied over just one study of one self-haul and one yard waste lane. This is a significant option that needs to be studied in the report. Having the option of two self-haul lanes in Algona will reduce self-haul impacts at nearby transfer stations including Renton, Enumclaw and Bow Lake.
- Report needs to also look at leaving one self-haul and one commercial lane available in Algona. This alternative continues the current use and needs to be fleshed out by pairing with other alternatives explored in the report.
- In the year 2001 recycling services were projected and planned for Algona. Featuring recycling in Algona is possible, especially now in particular as a result of King County owning adjacent land.
- Algona Transfer Station yard waste service can be provided on adjacent King County land by a current tenant such as Interwest Landscape Products or similar tenant such as Pacific Topsoils. Landscape product suppliers typically receive yard waste from customers. King County owns the adjacent land, leases it, and can require tenant to receive yard waste.
- Found on Page 1 of report: "these aging facilities can be renovated to continue operating, but cannot be expanded to provide adequate recycling services, meet vehicle capacity demands or mitigate for community impacts e.g. dust, noise and odor." This statement is wrong and misleading. Algona has adjacent additional land that can be used.
- Reference to a Redefined Criterion 8, this reference is confusing. Algona has the ability to expand. (Page 8 of report)
- Cedar Recycling which is within close proximity to Algona needs to be stated in report. Cedar Recycling is currently receiving plastics, metals and cardboard. Cedar Recycling has plans to remake and expand.
- Data and results in report become skewed when too much is tied together between several areas in King County.

- How can transfer stations in Renton and Enumclaw be better used and part of the plan for commercial, recycling, self-haul and yard waste? Make these transfer stations part of the plan and specific to solutions and studies in South King County.
- South King County should be granted the same wait and recommendation as North King County. Unfair treatment is being applied to South King County.
- Existing rural drop boxes should be noted on all report maps. Report information and drive times are misrepresentative without rural drop boxes being included.
- Corresponding incongruent alternatives, less likely scenarios and limited alternatives are given and studied as the alternatives in the report. Additional alternatives need to be evaluated and expanded upon.
- Bring up to date information and maps to include South Seattle Transfer Station and Pierce County Transfer Stations. Customers will and do take advantage of shorter drive-times and locations of nearby transfer stations outside the ones managed by KCSW.
- Renton transfer station should not be closed and should be studied as remaining open in the report and in all other alternatives studied. Multiple use options between commercial haul and self-haul should be studied in the report for Renton transfer station.
- Substantial portions of City of Auburn are in Pierce County. Additionally, 10% of Algona transfer station use is from Pierce County. Please disclose this material in the report. Please also look into the impacts on transfer system capacity when various limitations and disincentives are used with Pierce County residents and cities.
- A Factoria transfer station decision should happen first and then studies should be done separately for North and South King County should be done.
- Comparable to the City of Bellevue with the Factoria Transfer Station, the cities of Algona and Auburn have permitting, zoning and land-use issues with the siting of a new transfer station. This needs to be specifically mentioned in the report in order to present information fairly and accurately.
- City of Bellevue received greater participation, influence and involvement from King County. Equality must be granted to other impacted cities.
- Additional data or other changes made to this report between October 23 2013 and November 27, 2013 need to be given further comments from the public.
- Remove the overall bias by King County Solid Waste to build new transfer stations. Other functionality and service options were avoided by King County Solid Waste.
- Please present the report with more resolutions and available options that do not build new transfer stations. The Study of the retention and repair of the transfer stations was a major component of Ordinance 2013-0258 which required this report to be completed.
- King County Solid Waste was the one who chose the limited public comment period of two weeks and retained 4 weeks for final report changes. 30 days is typical for public comment period and King County Solid Waste chose a shorter comment period for the public which is an unfair and unequal amount of time to comment.
- Stakeholders, committees and the public were frustrated by the control of the data, documentation and selective presentation of options for accurate feedback by King County Solid Waste.
- Siting a new transfer station close to Bow Lake further creates South King County as a dumping ground of the majority of King County's solid waste.
- Projected bias is in this report and an independent third party needs to review this study. A third-party independent study will provide additional ideas, verification of data and equitable treatment to all interested parties.
- Clearness of dates as it relates to level of service passing/failing grades needs to be made within the report. References are made to system failures without specific dates or locations of failures. A matrix or graph system needs to more clearly disclose and present information. Data and Results are presented in a misleading way.
- Number of transfer stations proposed falls disproportionately on the community of South King County.
- Fairness should be given in the wait-and-see approach to both South King County and North King County.

- Capability to wait and phase a transfer plan is beneficial and provides a more accurate delivery of future needs.
- Prolonging the life of currently functioning and existing facilities is a realistic alternative with the best outcome for rate payers.
- King County should postpone and see the data and learning from Bow Lake and Factoria before building in South King County and North King County. Thus resulting in a better Solid Waste System which then can be sized and outfitted to meet future needs.
- Recycling (carpet, mattresses and other items) will influence Transfer Station System requirements. Waiting will allow future facilities to be adjusted to new recycling trends and products.
- Biomass Processing, Waste to Energy and Zero Waste Initiatives play a part in solid waste plans; needs and impacts to transfer stations. These items need to be integrated into the report.
- Waiting to build new transfer stations, capital costs will be smoothed out and impacts to rate payers will be reduced. Please model this approach in the report.
- Transfer Stations are an overall antiquated approach that we should be careful to invest in.
- Past incorrect estimates and planning is a risk factor. Waiting to build new transfer stations lessens this risk.
- In general King County Solid Waste System flexibility is gained by waiting to build new transfer stations. Future Trends and new technologies can be incorporated into the system by waiting to build new transfer stations.
- Cedar Hills Landfill has the ability to add some direct haul. Specific direct haul capacity needs to be disclosed in the report. Direct haul can moderately ease the burden on transfer stations.
- Cedar Hills Landfill can become a Transfer Station site now or at the proposed closing date of 2025. This option needs to be further studied.
- Cedar Hills Landfill is near capacity and is projected to close before 2040. Originally it was first set to close in year 2012, then 2018 and now 2025. The impending Cedar Hills Landfill closing affects Transfer Station System and impacts need to be part of this report.
- South King County has the only potential to provide a transfer station with intermodal feature included. The Determination of specific advantages and system costs of an intermodal transfer station are necessary in report. It is short sided to not have an intermodal facility plan in place before siting a new South King County transfer station.
- Report needs to address long term recycling trends and ability of ordinances, policies and rates to influence volumes.
- Mentions to potential increase in greenhouse gases will be countered by vehicle efficiency increases and alternative fuel use like compressed natural gas.
- Technologies for waste conversion will influence the Transfer Station System, need to be incorporated into the Transfer Plan Review, and be a part of projections out to 2040.
- "However, environmental analysis related to the recycling options for each alternative was beyond the scope of the review" Recycling and environmental trends are a focus and need to be in the front of the report.
- The possible for and contemplated use of Biomass processing at transfer stations needs to be integrated into the report.
- Many recommendations in HERRERA Optimized Transfer Station Recycling Feasibility Study just issued in July of 2013 need to be further developed, explored and incorporated. Recommendations have drastic impacts to the Transfer Station System.
- The Bow Lake recycling center just opened in October of 2013 and we need to understand how recycling affects Bow Lake, the Transfer System, and potential future changes to solid waste and recycling services.
- Report references to tipping floor sorting are made. None or very little tipping floor sorting is being done neither is there a specific use plan outlined by Solid Waste.
- Scheduled and future Zero Waste Initiatives will change solid waste system requirements.
- Bulk curbside pick-up can be done that will limit self-haul demands and therefore transfer station traffic volumes. This opportunity needs to be studied in the report.
- Clients using self-haul services that are not part of the King County Solid Waste system should be charged an extra amount for use of the transfer system. Surcharges should be considered for Pierce

County users and Bellevue city users. Much like, the City of Tacoma charges non-residents a premium to use their solid waste system.

- Required recycling for new items should and will likely be a part of future polices. This will change transfer system needs, volume. results of the study. This needs to be mentioned in the report.
- Current capital costs and bonds should be paid off before Bellevue and other cities withdrawal from the solid waste system.
- Rate differential should be established for cities without extended interlocal agreements. This rate differential should be studied in the report
- Disproportional impacts are experienced and need to be rectified because of cities choosing not to participate in the ILA.
- Numerous cities electing not to be part of the current ILA past 2028 should be given a firm deadline until the end of 2014 to lock in their decision. Revised Transfer System plan should not be adopted before this deadline is established.
- Mentions to low grades and systems failure is based on minor portions of data not meeting standards and is presented in a misleading manner. Report conclusions of long drive times are draw by taking from furthest areas and not addressing nearby facilities such as King County Drop Boxes, City of Seattle facilities and Pierce County facilities which boarder King County and impact the King County Solid Waste System.
- Report categorizes failure as a letter C with exceeding level of service over 10% of the operating hours. The determination and label as failure is misleading to the reader.
- Conclusions and recommendations on page 35 are not supported by the data.
- Report references to Level C service equating to failure does not provide appropriate context. A wait 10% or more of the time should not be considered failure.
- Level of service grading scale with wait times is bias toward presenting failure. System grading needs to be equally distributed over the range. The use of letter grades also needs to be changed to numbers or other indicators to present data in a fair and understandable manner.
- Frequency, year and in what areas of King County exceeding Level C needs to be provided in the report. Systematic presentation of this data needs to be made in this report.
- Times for travel vary by traffic patterns, time of day and other factors. These important variables need to be shared in this report.
- Solid waste tonnage forecasts go up and down in the report in multiple areas. Please reference the data to support this change. This data is unlike that of past studies that were published by King County Solid Waste. See Page 11 in report.
- Use of the 2027 date is misleading and should be post July 2028 when Bellevue drops out of ILA.
- Systematic and incremental analysis of impacts, capacities and functionality was missing in the report and falls short of the intentions of the King County Ordinance 2013-0258.
- Page 10 states, "In order to model the alternatives developed for this process, it was necessary to make assumptions in forecasting and in calculations where data is not yet available". This is not appropriate to do before spending several \$100 million on a transfer station plan.
- Several cities (City Managers, Mayors and City Staff) expressed concern about the inadequate time to property study, assimilate new information and comment on this report
- King County RPC voiced concern about the limited time to property study, assimilate new information and comment on this report.
- Time should be provided for a 3rd Party independent study and review to be done before report is adopted. Last independent review was done in July 2007.
- Public verbalized concern about the limited time to property study, assimilate new information and comment on this.
- 2013 Solid Waste Plan remains in draft form and needs to be finalized before revising the transfer station plan.
- The interested parties and the public received only a two week comment period which is very short and uncommon (usually 30 days).
- Timing the release of this draft report release does not allow cities and groups time to present this report as an agenda item and take action given a commonly used set schedule of meeting times of various interested entities and groups.

- MSWMAC and SWAC Advisory Committees communicated concern about the limited time to property study, assimilate new information and comment on this report.

Please ensure that my feedback is documented in the final report. Thank you!

Sincerely,

Maribel Mesina
Mmesina729@gmail.com

From: Ben and Wendy <wendymnoble@msn.com>
Sent: Thursday, January 23, 2014 10:57 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: We Oppose the North Auburn Garbage Site!

I am writing this email to oppose the possibility of a transfer station to be built at 28721 West Valley Highway in Auburn. This site is just down the hill from my home. I also support the county in their opinion that this site is the least desirable option.

This will be a great hardship for our family. Our property values have dramatically suffered in the past few years, and will likely continue if this goes forward. This will affect many of our surrounding neighbors who are already just trying to get by.

The impact on our family personally is great. We have 2 young special needs adopted children. They both have sensory processing issues and one of them is especially sensitive to sound. The purpose for staying in this community was because of the quiet neighborhood park, which will be almost directly above the new site. I am concerned that the noise from the site will interrupt the therapeutic play and lives of these special children. This is another factor that we are considering moving from the house we planned to raise our family in. Unfortunately, we do not want to move away from the support system that our children have come to depend on at school and in the community. This is also not the best decision financially to be selling our home. I hope it does not come down to that.

The health problems in our family are also impacted by the environment. We live in a home with two immune suppressed persons and are also concerned about changes in air, water quality and other environmental factors. Another desire that I have is to make sure the variety of unique species of birds in that area are protected the best way possible. The beauty of the area will definitely be changed.

Please **highly** consider the expansion of the **current Algona station** or study **other transfer station options** which will lessen the impact on the environment and are more cost effective.

Thank you for your interest and concern for our community and the families who live in the area of the proposed site. I am confident that considering options that are less costly and that are better for the environment will be the right choice in the long run. Please be considerate of our community and reconsider other options.

Sincerely,
Wendy Noble

From: marilynenorton@comcast.net
Sent: Saturday, January 25, 2014 5:32 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: We oppose No. Auburn Garbage Site

January 23, 2014

To: King County Executive, Dow Constantine, King County Council Members and Diane Yates

We are writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. We agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives. There are hundreds of households above and around this proposed site that do not want this type of facility in our neighborhood. Many of us have expressed our concerns about the placement of this facility in the past at various neighborhood meetings and will continue to do so as long as this site is still on the table.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, we urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

We especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility. Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made.

Thanks very much for your interest and concern. We look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Lloyd & Marilyn Norton

28435-53rd Ave. So.

Auburn, Wash. 98001-1936

NATHAN
(NO SURNAME PROVIDED)

From: SWD, WebSite
Sent: Friday, November 01, 2013 1:21 PM
To: SWD, WebSite
Cc: Yates, Diane; Gaisford, Jeff; Severn, Thea
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Nathan
ADDRESS: Bellevue, WA
EMAIL:

COMMENTTYPE:

PROGRAM: Transfer & Waste Management Plan Review

COMMENTS: Please consider all options when deciding future transfer station plans. Many of the existing transfer stations could be modified to absorb the increase in waste traffic over the coming years without the exorbitant cost of a new transfer station. Most of the recycling is currently done outside the main transfer building. Recycling can be implemented at existing sites that do not have it. Please start implementing existing recommendations that do not require a decision on a new transfer station and will require a lower level of capital cost. We have an existing transfer system that has some strategically located new stations that can work together with the older stations. Together we can extend the life and use of what is currently in place without building new stations.

Following the example of other cities, King County should align policies, fees, and regulations to emphasize, incentivize, and compel reuse and recycling of waste toward Zero Waste of Resources. If County facilities are to take a more active role in diverting reusable products and materials from its waste stream, King County Code regarding salvaging and scavenging should be altered to reflect that priority. Please show how Solid Waste is incorporating the 139 potential new strategies that were recommended in the July 2013 Optimized Transfer Station Recycling Feasibility Study into future and current transfer stations. King County needs to study the option of co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities.

King County Solid Waste failed to come up with new, creative and innovative ideas to challenge the 2006 Solid Waste Transfer and Waste Management Plan. Rather, upon review, King County Solid Waste is continuing to push through on its original 2006 plan. The exercise of Ordinance 17619 was not to have King County Solid Waste defend the 2006 Solid Waste Transfer and Waste Management Plan but in part to determine if changes could be made that could reduce future expenditures.

Processing technologies to increase diversion exist to address the commercially collected and self-hauled material streams delivered to the County's facilities. There are a limited number of commercially viable technologies for treating commercially collected residual waste:  Advanced Thermal Recycling/Waste-to-Energy ? a process of generating energy in the form of electricity and/or heat from the incineration of waste.  Mechanical Processing to Create Refuse Derived Fuel ? a fuel produced by shredding and dehydrating waste into fuel pellets. The pellets are then burned in a waste-to- energy facility or another industrial facility such as a cement kiln.  Mechanical Biological Treatment - a type of waste processing facility that combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion. King County should study these options in this report and more fully before proceeding with new transfer stations.

Numerous functional and service alternatives were not fully explored. These include further options of continuing use of existing transfer stations for various types of users, changes in operating hours, development of new class of small business haulers, addition of services on adjacent land, and use of private service providers. It is also prudent to eliminate the acceptance of most standard curbside recyclables at transfer facilities, as it is more efficient and cost effective to collect them at the curb. The space and resources at the stations could be used instead for collection of other materials that are not easily collected curbside. For example: King County estimated that its transfer stations and

landfill received about 90,000 mattresses weighing more than 3000 tons for disposal in 2011. A policy should be developed to ban the disposal and recycle of these 90,000 mattresses.

Please explore options such as 80% of system users within 40 minutes travel time. Options like this were not explored in the report. Please also revisit level of service criteria and recommend other changes that will meet King County's needs while providing future flexibility. For example, one such change could be that Bow Lake provides emergency storage for Algona. It is important that retention and repair costs and the overall report takes into account adjacent land that King County already owns at Factoria, Algona, Houghton and other locations.

In 2004, when Cedar Hills was facing full capacity, a full review of the transfer plan was in order therefore the 2006 Solid Waste Transfer Plan made sense. Since that time, parts of the 2006 Solid Waste Transfer and Waste Management Plan have been implemented, the solid waste transfer system has stabilized and King County is no longer faced with a dire waste management and transfer plan. Due to the completion of Vashon Island, Bow Lake and Shoreline transfer stations, along with the permitted Factoria, a solid waste and transfer infrastructure has been created and it is now in place. More capacity has been created a Cedar Hills and recycling and yard waste programs have reduced overall tonnage. King County does not have the same solid waste and transfer problems as they once did and therefore it has time to be flexible, reasonable and fiscally responsible. Circumstances have changed and a review is warranted. The King County Transfer Station DRAFT Plan Review indicates differently and the above must be addressed.

What is the hurry? Do it correctly. Do it once and do it right. Please study the option of using storage capacity at newer transfer stations such as Bow Lake in an emergency and limiting emergency service at older facilities such as Renton or Algona. Please also study the option of trailer storage of refuse on the adjacent land that King County owns in Algona and other facilities. Please study the use of privately owned transfer stations and recycling centers and how they might substitute or supplement King County owned facilities.

RPC was very concerned about the lack of time to process and comment on the draft report. Please recommend more time for the involvement of stakeholders. Upon issue of the DRAFT Review, public perception is such that Solid Waste is pushing its agenda through at any expense. Extending the life, remodeling and enhancement of the existing transfer stations will maximize ratepayer value and provide rates as low as reasonably possible. This is achievable especially with some compromise on level of service objectives.

Recommended changes found in audits and 3rd party reports from GBB report in 2007 and HERRERA report in 2013 have not been incorporated into the Transfer System Plan and this report. Processing recycling at Bow Lake and Shoreline is possible but would require extensive operational changes. Solid Waste should implement and understand tipping floor sorting and recycling before building new \$80 million transfer stations that might warrant changes. Another major concern is for storage for disasters, which can be achieved using extra capacity on the inside of newer transfer stations. In the event of a disaster, waste can also be directed from older transfer stations to newer transfer stations or to transfer stations outside the disaster area. Disaster refuse can also be stored in trailers at existing transfer stations and on adjacent land already owned by King County at locations such as Algona. Temporary direct haul Cedar Hills Landfill can be used in the event of a disaster. King County can also pursue disaster agreements with Seattle Solid Waste, Tacoma Refuse and other municipalities. Please incorporate these options into the report.

The overall pursuit of alternatives even be it incremental improvements or changes is missing, thereby not arriving at the best solution for ratepayers. Solid Waste is overlooking the intent of Ordinance 17619 and its author(s).

Given the lack of innovation and Solid Waste's desire to continue with a minor variation of the Base Plan (possibly phase North King County), a third party independent review is necessary. An independent review happened in the original 2006 Plan and therefore it is important to do so now, if not more important given King County Solid Waste's position. Had King County Solid Waste demonstrated they are thinking outside the box in the Review and thorough in its reporting it may not be necessary, but because King County Solid Waste has not done so it is necessary to consult with an unbiased, independent third party.

A reduction in staff and lost jobs at King County Solid Waste would be a potential result in not building new transfer stations. King County Solid Waste staff could be biased in the preparation and presentation of information. A third party report will help insure the overall task and information is being processed in the most unbiased manner.

Please detail out the specifics of failure for each criteria for each location and include the degree of failure and date of any future failures. King County Solid Waste should study how each failure can be improved upon or overcome.

Incremental improvements will extend the life of transfer stations and provide future flexibility in the system. There are advantages to waiting before spending approximately \$80 million on a new transfer station.

Please make at least some suggestions or modifications on how the private sector could positively impact the transfer stations and reduce the need to build new stations. Stakeholders are looking for solutions in as many areas as possible and the private sector can help. The private sector has the ability to reduce the demand on transfer stations. Since the approval of the plan, King County has acquired additional adjacent land which can be used to make level of service improvements. Please evaluate how this additional land can be used to make improvements other than replacement of the existing Algona facility.

Bow Lake has extra land available. Please note this in the report and how this land can be used to mitigate changes and increased demand in the future. Please flesh out the use, option and impacts of more participation with private service providers as noted in Milestone Report 1, 2, 3 and 4. Many dates, costs and factors have changed since these reports have been issued.

The following policy and program initiatives resonated as the top opportunities from outside research that have real potential for King County, and address the primary constraints identified: Maximize the use of disposal bans where markets are in place in order to divert materials and products to the appropriate private reuse and recycling infrastructure. Refine the use of recycling fees to emphasize curbside collection of traditional recyclables and to create more opportunity for other targeted materials. Enhance program initiatives in product stewardship and use public collection and processing infrastructure to leverage existing or developing private collection and processing infrastructure. Refine waste acceptance and handling policies that restrict more active involvement by County staff in facilitating diversion of materials to reuse and recycling. A new ILA was just adopted and new language; provisions, policies and requirements are contained in the newly signed agreement. Please review these changes and how they impact the overall Solid Waste Plan and the Transfer System Plan. More alternatives and or combinations of alternatives need to be studied. Additionally options on how they get purposed whether it be for self-haul, commercial haul, yard waste or recycling.

The costs need to be presented in a systematic manner with incremental costs presented for each station being remodeled in addition to the proposed rebuild. Costs figures need to be presented in a more incremental way. Solid Waste has lumped alternatives together which could be appropriate but in doing so confuses the reader and also presents the information in a complicated manner. Additionally, King County is scheduled to conduct a rate study in 2014. The rate study and results should be incorporated into this report. A rate study has not been done for a number of years.

King County solid waste disposal rates are significantly lower than the tipping fees in adjacent jurisdictions. How will changes in rates affect future system demand and reduce the need to build new transfer stations? Bellevue did not renew the Inter Local Agreement therefore there is a shortfall between 2021 ? 2028. This affects the Houghton Transfer Station and Bellevue. This is a short term problem and therefore a short term solution is warranted. By continuing with the long term plan and if cities do not renew the Inter Local Agreement then there are fewer people to share the capital costs. Changes to the ILA's and the cities participating in the system will impact the development and configuration of the system, future capital investments, services and rates.

Please study the benefits of restricting use or changing the rates for users from Pierce County using the Algona Transfer Station. Also, the benefits of restricting use or changing the rates for users from the City of Seattle using Bow Lake, Renton and Shoreline Transfer Stations need to be accounted for. Extending operating hours is a very cost effective use of facilities. Please study extending hours of operation at each station as a means to mitigate wait times and provide further options for both commercial and self-haul.

Please study the alternative whereby no transfer stations are closed and transfer stations are remodeled with commercial service remaining at all locations. This alternative will likely result in the lowest collection costs and therefore an important alternative to consider in this report. Traffic studies should be performed verses using web based drive times. Specific frequency and length of wait times should be studied. An overall rate study on collection costs and other costs should be performed.

The scoring system is too negative in its rating scale. A wait time slightly exceeding 10% would equate to failure and this over dramatizes the wait time issue. Please be transparent in the presentation of information and don't project a bias. King County Solid Waste mentions drive time and wait time in the Review. Why does this issue matter? This has not

been fully analyzed and it is an example of King County Solid Waste lack of flexibility in addressing ?issues?. Is it unacceptable to state that when a transfer station is located further away and/or it is congested it may end up taking the hauler longer? If that is unacceptable statement/situation, could the issue not be addressed or mitigated by differential pricing?

Please fully explore options, incentives, restrictions, policies and changes with self-hauling. A combination of changes to self-hauling with extend the life and potentially reduce demand on the transfer station system. Increasing tipping and self-haul rates to meet or exceed neighboring municipalities such as Seattle, Tacoma and Pierce County will reduce demand on our transfer system. Please specifically study the elasticity and changes to rates and tipping fees. Several increasing efficiencies should also be taken into account in the report; namely the increased use of alternative fuels such as compressed natural gas by commercial haulers. The report should mention that new trucks are also more fuel-efficient. Also, the impact of potential increased use of onsite waste compactors by commercial property owners and apartments will dramatically reducing traffic and GHG emissions.

What could Solid Waste add to existing transfer stations (i.e. recycling, yard waste) to mitigate issues vs. building an ideal transfer station based on a dated Transfer and Waste Management Plan. Do not let ideal features decide the future size and use of transfer stations. Rather, the approach King County Solid Waste should take is: what can be added to existing transfer stations to mitigate solid waste and transfer matters? There is an innovative way to provide similar services at transfer stations but address how each transfer station will accomplish it differently. Should King County co-locate, design and build end-use and/or energy recovery facilities at existing or new King County solid waste facilities? Should King County construct a regional resource recovery park for multiple recyclable and compostable materials at a new site and how will this affect the overall transfer station system? Should King County site, design and build new King County solid waste facilities to align collection and processing in advanced materials management system and how would this affect transfer stations?

Please look at not closing Renton, Houghton and Algona transfer stations and further evaluate alternatives around these. Renton is closed in all alternatives and this affects South King County where a new transfer station is being considered. It makes no sense to close the Renton transfer station thereby causing system constraints that lead to building a new location. Please evaluate keeping Renton open in all alternatives.

King County code (KCC 10.12.021.G) allows fees for recycling to be set lower than those for disposal to encourage recycling over disposal. The use of differential fees is an important tool for increasing reuse and recycling. Please study the impacts of changes in fees and future needs of transfer stations. Numerous cities in King County do not require curbside recycling and please study the impacts of this in the report.

The mission of King County's waste reduction and recycling programs is to divert as much material as possible from disposal in a manner which reduces the overall costs of solid waste management to county residents and businesses, conserves resources, protects the environment and strengthens the county's economy. The draft 2013 Comprehensive Solid Waste Management Plan should be updated and incorporate the July 2013 HERRERA Optimized Transfer Station Recycling Study before issuing the 2013 Comprehensive Solid Waste Management Plan in its final form.) The HERRERA report presented 139 recycling strategies and these were allocated among station generations as follows: ? Sixty-four (64) strategies were applicable to all stations ? Seven (7) strategies were applicable to older stations only Disposal bans at transfer facilities for priority materials such as clean wood, scrap metal, yard (and land clearing) waste, mattresses, and cardboard are not being used to the maximum extent possible to advance Zero Waste of Resources goals. Overall recycling and zero-waste initiative goals are lacking in this report and have a very significant influence on how we use the King County Transfer System. A fee on traditional material recycling at transfer stations should compel customers to place them into the curbside collection system, if it is available, rather than travel to transfer facilities. This reduces vehicle travel overall, and produces fewer emissions.

Please evaluate the use of the additional land that King County purchased in Algona. This can be used as expansion space for Algona while keeping or remodeling the current structure. It is a major oversight not to consider how this additional land can be used to meet current needs, add services or come closer to meeting criteria. There is also an opportunity for thinking differently about the flow of material, such as partnering with Cities for alternative spaces and drop box sites using City real estate.

Be reasonable. Do not overbuild. Listen to the communities. Be innovative. Solid Waste is jamming new transfer stations down the public's throat at their expense. If a transfer station is overbuilt it is a waste to rate payers. Solid waste transfer and waste management is an important issue, but if not done correctly mistakes are very costly. A

careful and timely consideration of these alternatives by decision makers will be needed as part of the transfer system plan.

Please attach the HERRERA Optimized Transfer Station Recycling Feasibility Study done in July 2013 to this report in both the Appendices and also in the body of the report under recycling and other sections.

As the County proceeds to modernize its transfer system with the siting, design, and construction of new facilities, and the updating or moth-balling of others, stark choices exist:

- ? What is an appropriate level of recycling to accomplish at existing and new facilities?
- ? Should the County do material processing itself to accomplish its Zero Waste goals? At what level?
- ? What type of partnership should the County have with the private sector?
- ? What is the best mix of facilities (and where should they be) to maximize diversion efficiently?

I appreciate your taking the time to read through all this and consider all that I have written herein.

IMG_VERIFY: red

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 11/1/2013 1:21:15 PM

HRP PROPERTIES

P. O. BOX 700 • MERCER ISLAND, WA 98040

Phone: 206-232-7500 Fax: 206-232-1585

January 30, 2014

Mr. Dow Constantine, King County Executive
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear Mr. Constantine,

As owner of several properties in and around Auburn, including 425 "C" Street N.W. of 133,610 square feet, 1601 15th Street N.W. of 41,900 square feet, 2601 West Valley Highway of 121,280 square feet, and 1302 29th Street N.W. of 192,805 square feet, we have serious concern about the possible new \$127M North Auburn Transfer Station near West Valley Highway.

We submit this letter as part of the King County Transfer Station Plan public comment period.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that **an expanded transfer station at the current Algona site is the clear path forward.**

We also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **why not expand at Algona?**

The path forward that is most viable for the County, for the community and for fiscal responsibility is an **Expanded Algona Station**. Here's why:

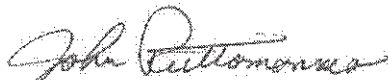
- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station

To maximize cost effectiveness and regain the trust of the entire South King County community, we urge you to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of an expanded Algona transfer station as part of the EIS.**

We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,



John Pietromonaco
Manager

From: Justine Rojas <rojas.justine@gmail.com>
Sent: Tuesday, January 28, 2014 9:04 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: South King County Transfer Station

As you know, our North Auburn (near 277th and West Valley Highway) neighborhood has been identified as the preferred location for the \$127 million, 20 acre transfer station for South King County. Our concern is that a garbage station is not compatible with this area, which is residential, wetland and agricultural land. Our other concern is that in addition to the Transfer Station, South King County's SWD promises to bring more 'green technology' like Waste to Energy--such as incineration--to the surrounding area. Our group's goal is to improve the Green River in our Kent/Auburn area and maintain the residences and farmland in this area. We are asking King County for further independent study into options for South King County.

Thank you,

Justine Rojas
29102 52nd Pl S
Auburn, WA 98001

From: SWD, WebSite
Sent: Friday, October 11, 2013 9:59 PM
To: Wade Rosendahl
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: Wade Rosendahl
ADDRESS: Auburn, WA 98001
EMAIL: wqr2@comcast.net
COMMENTTYPE: Suggestion
PROGRAM: Transfer & Waste Management Plan Review
COMMENTS: The presentations at the Auburn city council meetings show serious issues with locating a transfer station at 28721 West Valley Highway. I don't understand why this option is still being considered. The existing site at Algona does not have the same concerns and can be remodeled for much less than the cost of a new site in Auburn.
IMG_VERIFY: red

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 10/11/2013 9:59:19 PM

From: Lisa Ruppel <ruppelisa@yahoo.com>
Sent: Thursday, January 23, 2014 12:29 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: STRONGLY OPPOSE NORTH AUBURN GARBAGE SITE

To Whom It May Concern,

I am absolutely astounded that the County would consider spending 100+ million on a new transfer station at all, but am equally concerned that 28721 West Valley Hwy in Auburn is being considered. I know the county already evaluated this site and found it the least desirable....so am very confused how it is back on the table as a possible location.

I live above this land and can not for the life of me, understand King County Solid Waste or the King County Council's thinking. There is a bus stop on the road leading to the proposed sit for goodness sakes.

We already have spent hundreds of millions to build new transfer stations on Vashon Island, Shoreline and Bow Lake.....Enumclaw isn't even operating at full capacity. We are a family of 5 and each week have about 2 bags of actual trash. If the kids clean their rooms, maybe 3. King County has a goal of "zero waste" by 2030 and I believe county residents are on board with this so the need for a NEW garbage transfer station makes no sense and certainly isn't a fiscally responsible solution. I would urge the county and Council to think again on this. There are other options such as renovating the existing Algona station....DOES THE COUNTY NOT ALREADY OWN 16 ACRES OF LAND NEXT TO THIS FACILITY?

I ask that you more fully evaluate the other options that would help decrease demand in South King County and be a better use of our tax dollars. I urge you all to step back and look again at this to see if in fact building a new multi-million dollar station is really necessary.

Thank you for your time, and I look forward to seeing how King County moves ahead in an economically and ecolgically responsible way.

Lisa Ruppel

From: vinylsyd@earthlink.net
Sent: Tuesday, January 28, 2014 11:53 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: Opposition to North Auburn Garbage Site

I am writing to strongly oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. As a homeowner above this proposed site and a business owner directly across the street, I urge King County to study other options, of which there are several.

The county has already spent hundreds of millions of taxpayer's dollars to build new transfer stations in the area and as such, we are not faced with a dire need for another one. Rather, we have capacity in the current system and the ability to be flexible, innovative and FISCALLY RESPONSIBLE.

I urge the county to more fully evaluate renovating and expanding the existing Algona station at considerably less cost to taxpayers. Consistent with King County's goal of Zero Waste by 2030, the South King County Transfer Station plan needs to focus on innovative solutions to decrease overall demand and maximize existing investments, not building new, unnecessary garbage sites..

Thank you very much for your interest.

Mason Ruppel

From: Kiernan, Kevin
Sent: Wednesday, January 29, 2014 9:24 AM
To: Drew S
Cc: Richardt, Eric; Young, Polly; McLaughlin, Pat; kcexec@kingcounty.gov; Dunn, Reagan; Dembowski, Rod; Council, Clerk; Noris, Anne; von Reichbauer, Pete; Gossett, Larry; Phillips, Larry; Hague, Jane; Patterson, Julia; McDermott, Joe; Lambert, Kathy
Subject: RE: Opposition to the Proposed North Auburn Transfer Station

Thank you for your comments. All comments will be considered and included in the responsiveness summary of the final Transfer Plan Report.

Information about the Transfer Plan review process can be found at the link below:

<http://your.kingcounty.gov/solidwaste/about/plan-review.asp>

From: Drew S [mailto:d.sand1@comcast.net]
Sent: Tuesday, January 28, 2014 9:41 PM
To: kcexec@kingcounty.gov; Council, Clerk; Noris, Anne; von Reichbauer, Pete; Gossett, Larry; Phillips, Larry; Hague, Jane; Patterson, Julia; McDermott, Joe; Lambert, Kathy; Dembowski, Rod; Dunn, Reagan
Cc: Richardt, Eric; Young, Polly; Kiernan, Kevin; McLaughlin, Pat
Subject: Opposition to the Proposed North Auburn Transfer Station

Hello,

Please find attached my formal opposition to the proposed North Auburn Transfer Station.

As a resident of the neighborhood directly above the site location I am very concerned for the quality of life in our neighborhood should the county support such an irresponsible project.

Drew Sanders

The logo consists of the letters 'R', 'W', and 'S' in a stylized, handwritten font, arranged vertically and slightly overlapping.

R.W. SCOTT CONSTRUCTION CO.

*General Contractors – 223-01-RWSCOC*229MU*

4005 WEST VALLEY HIGHWAY NORTH, SUITE A, AUBURN, WASHINGTON 98001

PHONE: (253) 351-0001 FAX: (253) 351-0055

10/21/13

**SCOTT JEFF
(R.W. SCOTT CONSTRUCTION)**

Diane Yates

Intergovernmental and Legislative Liaison

Directors Office King County Solid Waste Division

201 So Jackson St 701

Seattle, WA 98104

Dear Mrs. Yates

I'm writing you in regards to the transfer station review comments on the King County Transfer Station in Auburn, WA. I'm at 4005 West Valley Hwy North, directly south of the proposed Auburn North transfer station site. RW Scott Construction is a heavy civil contractor whom performs mostly public projects.

Common sense would prevail in the thought that the other sites, specifically the existing Algona site would be better suited than building a new site only 12 minutes away from recently completed bow lake station.

Here are some of my questions, concerns regarding King Counties Plan review.

What about expanding the currently operating Algona site?

Does King County Own any land in close proximity to the Algona site?

It's obvious this location has the best potential being it serves the outward south King County area.

Could the existing Algona site be remodeled?

Has the county done a cost study on a remodel?

I have read that a Study was done in 2001 Looks as if recycling is possible here.

Waste compaction is an option so says the study from 2006

200 Lineal feet seems excessive

Anyone looked at more than on self-haul lane.

What about working a deal with Interwest Landscape for yard waste,

Has anyone contacted Cedar recycling seeing what interest they may have?

Page 1 of report is ambiguous

Criterion #8 What! Can't figure this out. Doesn't Algona Have expandability?

Hauling Rates

I believe these are skewed, estimates they are! How accurate are these?

Cities I talked with a source at the city of Federal Way. Waste manage will want to renegotiate their rates if the transfer station is moved to north Auburn.

Hauling Rates, shouldn't King County find out what greenhouse gas emission's will be emitted if they have an added haul.

Shouldn't King County provide a report on who has control over haul routes and which stations they dump at?

I would like to see a map developed of Commercial haulers.

Where is the mapping for private recycling centers! Won't this impact the decision process?

Self-haulers need a separate study, they should pay more.

Surcharges should be considered for out of County patrons

Recycling

Bow lake just opened this month, shouldn't King County take a wait and see attitude and monitor waste and recycling services before spending 80 million

Biomass processing needs a separate report

Need further studies on the HERRERA feasibility study issued July 2013

Separate studies done on North vs. South Stations (a must)

Can't digest all of this data, can it be simplified

Let Factoria happen then take measures after a given period of time

What happened to timely order? Seems as if this is a fire drill! South King Should be given ample time.

What about Enumclaw Can it be used as part an overall plan/

How many private parties utilize the Algona facility? Make Pierce County residence dump at Pierce County Dump sites.

What is the future landfill limitations RE Cedar Hills?

Update longevity on Cedar Hills landfill.

Is there a signature on the ILA

Policy options

What if King County made recycling mandatory?

Provide curbside pick-up for recyclables. This would cut down on self - hauls to transfer stations.

Local City Agreement Impacts

Has King County studied the thought of Cedar hills transfer station, and or directly hauling to this site.

Social Concerns

Equal time should be given to South transfer station. At this time ample time has not been given

Two transfer stations 12 minutes apart creates (bow lake and proposed site) create an unequal balance.

Are there any other solutions? Is the well dry?

How about creating a report with findings on why King County shouldn't build a new transfer station.

Time

King County RPC has stated they were not given adequate time to complete property studies.

The release of this review does not allow enough time for cities and land owners to take an in depth look and schedule their meetings.

Need time for a 3rd party study. When was the last independent study completed? Why it was 2007 that's not yesterday in my view.

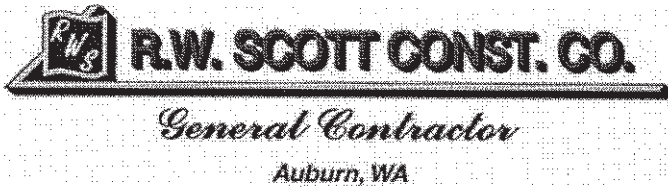
2013 Waste plan has not been completed and must be before finalization.

Please consider my comments, as they have a heavy impact on my business and property values.

Jeff Scott

Vice President

RW Scott Construction



SCOTT JEFF

(R. W. SCOTT CONSTRUCTION)

February 3, 2014

The Honorable Dow Constantine
King County Chinook Building
401 5th Ave. Suite 800
Seattle, WA 98104

Dear King County Executive Constantine:

R.W. Scott Construction is located at 4005 West Valley Highway in Auburn. We employ more than 25 staff and have been at this location for 14 years. As a proud North Auburn business, we have serious concern about the possible new \$127M North Auburn Transfer Station near West Valley Highway.

We submit this letter as part of the King County Transfer Station Plan public comment period.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that **an expanded transfer station at the current Algona site is the clear path forward.**

Our firm also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **why not expand at Algona?**

The path forward that is most viable for the County, for the community and for fiscal responsibility is an **Expanded Algona Station**. Here's why:

- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station

To maximize cost effectiveness and regain the trust of the entire South King County community, we urge you to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of an expanded Algona transfer station as part of the EIS.**



We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,

Jeff Scott
R.W. Scott Construction

CC:
Sung Yang
Pat McLaughlin
Diane Yates

From: scott.shoe@comcast.net
Sent: Sunday, January 26, 2014 6:48 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: We Oppose the North Auburn Garbage Site

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

William Scott Shoemaker

SNOWDEN CHARLES

Chuck & Gail Snowden
3913 So. 293rd St.
Auburn, WA 98001
253-946-1508

SEATTLE WA 98101

29 JAN 2014 PM 5 T



I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Your name here

Charles Snowden

FEB 03 2014

RECEIVED _____
 KING COUNTY EXECUTIVE OFFICE
 TO: _____
 DUE DATE: _____
 AUTHOR: _____
 SUBJECT: _____
 _____ ACTION _____
 _____ RESPON. TIME, DEC. SIG.
 _____ RESPON. TO EXECUTIVE
 REVIEWED BY: _____
 _____ FYI

Chuck & Gaile Snowden
3913 So. 293rd St.
Auburn, WA 98001
253-946-1508

SNOWDEN GAILE

SEATTLE WA 981

JAN 2014 PM 1 T



I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Your name here

Gaile Snowden

FEB 03 2014

RECEIVED _____
KING COUNTY EXECUTIVE OFFICE
TO: _____
DATE: _____
AUTHOR: _____
SUBJECT: _____

REVIEWED BY: _____

EYL

**SOUPLY TOM
(SPAN ALASKA
TRANSPORTATION INC.)**

From: Tom Souply <Toms@spanalaska.com>
Sent: Monday, October 21, 2013 1:59 PM
To: Yates, Diane
Subject: Proposed Transfer Station North Auburn/28721 West Valley Hwy. S., Auburn

Hi Diane,

I would like to share some concerns we have with the considered placement of a Waste Transfer Station located in North Auburn, less than one block from Span Alaska.

In regards to the Algona location:

- We understand the King County already has land adjacent to the existing facility to address the expansion needed. Developing the N. Auburn site surely would be more costly than re-modeling the existing site. Where is the study showing both options?

New Location

- How does it make sense to move the existing site 5 miles north to the end of the Auburn boundary away from all the targeted communities? This puts more pressure on 167 and West Valley? Now you are ten miles away from Bow Lake which is not at capacity and may not be for over 5 years.
- Where are the studies that show least amount of miles traveled to access a transfer station for population that is going to use it?
This seems key in a county where traffic is an extreme concern.
- Why would King County Spend Millions to mitigate road and storm systems needed to put in this transfer station when they already have it with existing? King County would need to make West Valley 4 lanes from 37th Ave to 272nd to accommodate additional traffic needed.

Bottom line, the commissioners need to have a full on session/meeting with the residents and business concerned with this location and really come clean on all the issues that must be addressed before a decision is made. There is too much at stake not to slow the process down and insure this is the right decision, if truly a decision really needs to be made knowing the existing capacity at Bow Lake.

With Respect,

Tom Souply
Span Alaska Transportation, Inc.
253-395-7726 (O)
253-326-1785 (C)
toms@spanalaska.com





SOUPLY TOM WITH LANDRY TOM
(SPAN ALASKA TRANSPORTATION,
INC)

February 3, 2014

The Honorable Dow Constantine
King County Chinook Building
401 5th Ave. Suite 800 Seattle, WA 98104

Dear King County Executive Constantine,

Headquartered along West Valley Highway in Auburn and with offices in Anchorage, Fairbanks, Kenai, Juneau and Wasilla, Alaska, Span Alaska has been providing world-class freight transportation to and from Alaska for nearly 40 years. We are a proud Auburn business and employ more than 40 full-time workers.

We write you today as a business located just blocks from the site identified as a possible location for a new \$127M South King County transfer station.

Span Alaska submits this official letter as part of the King County Transfer Station Plan public comment period.

We are among the many stakeholders who have closely followed the King County Transfer Station Plan process, as well as the South King County Transfer Station Environmental Impact Statement (EIS) process, and in doing so, it seems clear to us that a **North Auburn site would be an inappropriate use of taxpayer dollars.**

Span Alaska also has serious concerns about the speed by which this new investment is moving, given the rate by which King County has been building new transfer stations, and possible conflict with other King County studies currently underway. Frankly, it appears as though King County is acting as though the construction of a new transfer station is urgent. So we ask: **what's the emergency?**

North Auburn Site an Inefficient Use of Investment Dollars

As a (business type) business that is invested in the North Auburn community, we wish to see our government making wise decisions about spending and investment. The site that is most viable for the County, for the community and for fiscal responsibility is an expanded Algona Station. Here's why:

- King County already owns 16 acres of undeveloped land adjacent to the current Algona transfer station, which could accommodate the expansion without additional land purchase or changes to existing zoning;
- Unlike the North Auburn site, the current Algona facility is not adjacent to existing residential neighborhoods and is already zoned for this use;
- Improving the Algona site would cost roughly \$8 million, rather than the astounding \$127 million to construct yet another new transfer station

Since King County's 2006 Transfer Plan, new stations totaling more than \$300M in public funds have been built in Vashon Island, Shoreline and Bow Lake, along with a permitted Factoria station.



Building four new King County transfer stations in just seven years is an astounding investment of public funds and it is clear we are not faced with a dire transfer station capacity problem now or in the foreseeable future. Rather, *we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.* **Let's not risk overbuilding.**

Finally, we have serious concerns about the traffic a North Auburn transfer station will create for Highway 167, which is already extremely overburdened, as well as increased stress on an already very busy West Valley Highway. The challenge for West Valley Highway will come from the HWY 18 exit all the way to 272nd or from 15 Street NW Exit to 272nd.

To maximize cost effectiveness and regain the trust of the North Auburn community, we urge King County to study other transfer station options and combinations of alternatives beyond what has been presented. **We urge full inclusion of this sensible and fiscally responsible option as part of the EIS.**

We also join Auburn Mayor Backus and the City Council in its opposition of the North Auburn transfer station location.

Thank you for your attention to our comments.

Sincerely,

Tom Souply
President
Span Alaska

Tom Landry
Executive Vice President
Span Alaska

CC:
Sung Yang
Pat McLaughlin
Diane Yates

From: Ronald Spina <ras100@comcast.net>
Sent: Saturday, January 25, 2014 1:09 PM
To: Yates, Diane
Subject: South King County Transfer Station Location

Dear Ms. Yates

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thank you very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Ron Spina
Auburn, WA

From: Jay Stilwell <jay@studiochaton.com>
Sent: Monday, February 03, 2014 9:20 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: Please consider the alternatives

Dear Dow,

February 3, 2014

To King County Executive Dow Constantine, King County Council, and Solid Waste Division:

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Jay Stilwell

STORRS AMY

From: Amy Storrs <aa.storrs@gmail.com>
Sent: Friday, November 01, 2013 9:15 AM
To: Yates, Diane
Subject: Garbage transfer station in auburn

Diane-

My husband and I are home owners in Auburn close to the proposed garbage transfer station. We wanted to voice our opinion that we do not want the garbage transfer station on west valley highway. We feel that it will negatively affect our neighborhood (traffic, property values, etc). We as residents and homeowners want to keep our neighborhood at its best and hope that you will listen to our concerns and keep the garbage transfer station at its current location or find another plan to keep it off of west valley highway.

Thank you-
Amy Storrs



STREIFFERT DAN
(RAINIER AUDUBON
SOCIETY)

RAINIER AUDUBON SOCIETY

To: King County Council
Subject: Draft Transfer System Plan Review Report
October 22, 2013

Background on Transfer Station Review

The King County Solid Waste Division is currently doing a review of their Garbage Transfer Station Plan--as per the Ordinance put in place by King County Council to re-examine the system because tonnage projections are off and solid waste failed to get contract extensions with key cities like Bellevue so the amount bond money that will pay for the transfer stations is off.

The SWD looked at several alternatives to the base plan. Here are the basic choices that we have for South King County (Algona):

1. build a new station at 1 of the 3 proposed sites (our North Auburn site is still preferred) (cost \$80M)
2. remodel Algona and use as self-haul and yard debris only; divert commercial haul to Bow Lake (cost \$8M)
3. Close Algona, no South King County Transfer station

What is our best option?

The best option for South King County would be Option D***--which remodels Algona (and could expand on the adjacent property that King County already owns).

Key arguments to support Option D***

- Siting in South King County is a high risk and its issues need to be added to the review; remodeling Algona favors the environment and migratory birds that thrive in the Green River Valley; the KCSWD preferred site for a new station and further development (28721 West Valley Highway) is a wetland that is a vital part of the Green River Valley strip that is the home to 40% of Green River Valley's winter migratory birds. Building a transfer station and further green industry* will endanger the birds and will further shrink the Pacific Flyway. (*as stated by Director McLaughlin during Regional Policy Committee's Oct. 9th Meeting's Q & A period answering that King County's Waste to Energy Initiative will concentrate waste incinerators and other waste to energy projects around the transfer stations).
- King County must disclose in the Transfer Plan Review that it owns land parcels that are adjacent to the existing Algona Transfer site (purchased by King County to preserve expansion options for Algona in June 2012).

Rainier Audubon Society

P.O. Box 778, Auburn, WA 98071
253-796-2203

Visit our informative web site at : <http://www.rainieraudubon.org>



RAINIER AUDUBON SOCIETY

- A design on the Algona site that meets the waste demands of South King County is possible: recycling, yard waste, queuing, trailer storage and other level of service improvements in Algona are viable.
- Compaction and recycling are possible at the Algona Station (Compaction was studied and approved for Algona in 2006 Waste Transfer Plan; recycling at Algona was studied and approved in 2001 Waste Plan)
- the cost to build a new South King County Transfer Station is estimated between \$71-80 Million; a remodel of Algona would be \$8 Million, which is approximately a \$70Million difference to provide the same level of service
- The commercial haul data gathered by haulers is arguable and incomplete. The estimates, data, and opinions are limited. One hauler, draft report page 8 stated, "A more thorough assessment would necessitate studies on estimated traffic patterns and facility wait times, as well as the identification of specific locations for the proposed South County and Northeast County transfer stations. Consideration of these variables may significantly affect the cost estimates." An independent study of commercial haul for South King County and Northeast County transfer stations needs to be included in the draft; and each station's data should be gathered and presented separately so that true commercial haul costs for each area can be determined.
- the Transfer Plan Review needs to investigate the Algona Remodel option separately (not with NE Houghton) so that data is not skewed.
- Progressive countries like Germany and England recognize that landfills are an obsolete practice to handle waste. These countries have eliminated landfill sites and have moved forward proactively by handling waste as a resource. The current Transfer Plan does not include Zero Waste initiatives, such as waste diversion of bulk waste items like mattresses and carpet. King County needs to address Zero Waste and Waste to Energy in the review. Our Cedar Hills landfill-- which is our only landfill-- is soon to close (first 2014, extended to 2018, and now possibly 2025) and we must address how to handle our waste. The current King County Solid Waste Division's state of the art transfer station plan that must handle our waste for the next 50 years is already antiquated. Why spend over \$300 million dollars to build the remaining three transfer stations when we cannot justify how these stations will be adapted to a Zero Waste program. Zero Waste initiatives must be considered in the Transfer Plan Review and deserve an independent review; since 2006 great strides have been made to recycle and divert waste and King County Solid Waste must be more responsible and proactive by incorporating Zero Waste studies in the Transfer Plan Review.

Thank you for your consideration of our comments.

Dan Streiffert
Chair: Rainier Audubon Society

Rainier Audubon Society
P.O. Box 778, Auburn, WA 98071
253-796-2203

Visit our informative web site at : <http://www.rainieraudubon.org>

From: Marla Struck <struckml@yahoo.com>
Sent: Monday, February 03, 2014 3:39 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Cc: jmlstat@comcast.net; cindy.nonorthauburndump@gmail.com; maharkness@gmail.com
Subject: We Oppose the North Auburn Garbage Site!

Dear Sirs and Madams,

Besides the obvious traffic nightmare that would result from positioning the transfer station at the proposed site 28721 West Valley Highway in Auburn, which I have already addressed in previous correspondence, it is patently unfair to me and my neighboring homeowners. South King County has plentiful property available for use. It would be prudent to use some tax funds from the entire south county instead of putting the entire onus on the citizens living in close proximity to the proposed site. North Auburn is a huge industrial base, yet you have identified a parcel surrounded by residential dwellings. I urge you to rethink this site and find one that considers the interests of all south county residents.

Thank You,

Marla Struck
Resident, South King County

STUDLEY KEN

From: Ken Studley <ken_studley@yahoo.com>
Sent: Monday, February 03, 2014 12:03 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Cc: jmistat@comcast.net
Subject: We Oppose the North Auburn Garbage Site

I am writing in opposition to the site of the proposed \$127 million garbage/recycle transfer station at 28721 West Valley Highway North, Auburn WA. I am in total agreement with the county's own earlier evaluation that this site is the least desirable of all possible South King County alternatives.

I am appalled this site would be even considering the environmental sensitivity of the site and surroundings, existing high and growing traffic volume of West Valley Highway here, deteriorating road infrastructure not to mention expense related to maintenance even after such a facility were to be built, degradation of local residential and commercial property values, and the county already owns 16 acres of undeveloped land adjacent to the current Algonia facility.

This proposed facility just does not make prudent common sense decision making. Please vote down this location at 28721 W Valley Hwy N, Auburn, WA

Thank-You
Ken Studley
Auburn WA

From: bont100@comcast.net
Sent: Tuesday, October 22, 2013 3:05 PM
To: Yates, Diane
Subject: Concern for putting a Garbage Transfer Station in North Auburn at 28721 West Valley Hwy. S. Auburn WA.

Dear Diane Yates;

I was told we could comment on the possibility of a garbage transfer station in my neighborhood. at the location of 28721 West Valley Hwy. S., Auburn, WA..

The area of the site is considered zoning for M1 light Industrial use and not zoned for M2 Heavy Industrial use like a large Garbage Transfer Station and heavy trucks coming and going all day long. This is farmland and wetlands that have been here for many years. That is what brought residents to this area like me to this neighborhood in North Auburn. The charm and quietness of the area lush with greenery and nature areas.

The are number of family homes there on that street too that would suffer from noise and traffic on the street across from their homes. The homes would also depreciate in value living across from a garbage transfer station. The emissions from all trucks and cars constantly on the small farm roads would cause pollution and stress to the family's there. Also all the neighborhoods including my at 29609 57th Pl. S., Auburn, Wa. which is just up the hill from the proposed transfer site will be affected by the same.

Light Industrial M 1 zone to me means small business that can bring economic growth to the city not to have a Transfer Station eye sore to our community in North Auburn. We annexed to Auburn trusting in our government to beautify the community and keep costs down. Save our farms, wetlands and streams intact not shove them around to suit their agenda. The use the land for a Transfer Stations that would impact us greatly with large truck traffic on small farm roads which get very busy during rush hours would create traffic jams, pollution and has no economic value other than raise our rate for collection fees. I do not think it would benefit the Auburn City in any way.

The residents in the North Auburn area deserve to have our voices heard. Leave the Transfer Station in Algona as is or redo that one there with property already bought by King County. Auburn scored the lowest for this site criteria and therefore should not be considered for such a large facility to impact the North Auburn Neighborhoods and roads in that area.

I hope King County will save money by leaving it in Algona and remodel that station.

Sincerely,
Bonnie Tiangsing
29609 57th Pl. S.
Auburn, WA. 98001

From: bont100@comcast.net
Sent: Thursday, January 30, 2014 11:33 AM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: Opposition for a proposed Garbage Transfer Station at 27821 West Valley Highway in Auburn site
Attachments: letter to King Cty. Members about NNAGS jan. 2014.doc

Dear King Council members,
I've attached a letter of opposition for a proposed Large Garbage Transfer Station in the quite neighborhood of 28721 West Valley Highway in Auburn.
Reasons of cost, environmental concerns and impacts of traffic to the North Auburn Area and South End of King County.
Sincerely,
Bonnie Tiangsing
North Auburn Concerned Citizen

January 30, 2014

Dear King County Council members,

I am writing King County Council members to oppose the siting of a Large Garbage Transfer Station at 28721 West Valley Highway in Auburn. Saving money for better use on our roads and transportation, environment and jobs are more important to me at this time.

With all our recycling implemented already and in progress I feel there is no need for a New Transfer Station in the North Auburn Area. Remodel the Algona site at a much lower cost \$8 million as opposed to \$127 Million for a New Transfer Station. Algona already has property bought, 16 acres across to expand recycling facility if needed. Enhance the Algona Station with a remodel instead of spending \$127 million on a new one. King County has already invested \$300 Million for New Transfer Stations at Vashon Island, Shoreline and Bow Lake with another plan for Factoria.

We are in a time were recycling is a goal of Zero Waste for landfills. The future goal of recycling should be encouraged along with saving the taxpayers money and spending it on other projects needed to be done in 2014.

Our wetlands are endangered from their natural state and our sensitive eco system should be kept in tact when possible. Maybe light industrial businesses, a small park might bring money and jobs to our city of Auburn would be a better value. Traffic congestion should also be considered moving forward with any plans as it is already congestion during peak hours in the South End as you well know. Bringing more traffic and pollution, along with noise to our neighborhood does not enhance our way of life. Our property values would go down and the 23 people who live on that street would be greatly impacted besides us.

I hope once you review all the facts and the cost that you will come to a conclusion that the Algona remodel and expansion would be a much better value once all the facts are in. Along with public comments from neighbors concerned in North Auburn. For you to make a fiscal and enviornmental judgement in moving forward.

Thank you for listening to our concerns in the North Auburn Neighborhood where I live. Looking forward to seeing our responsible government action in any plans put forth in the South King County Area on this matter.

Sincerely,
Bonnie Tiangsing
North Auburn Concerned Citizen

From: SWD, WebSite
Sent: Saturday, October 19, 2013 9:01 PM
To: SWD, WebSite
Cc: Yates, Diane; Gaisford, Jeff; Severn, Thea
Subject: WEB SITE COMMENT: Transfer & Waste Management Plan Review

Thank you for submitting the following comments via the Solid Waste Division website. Your message has been forwarded to appropriate staff who will contact you shortly.

PERSONNAME: John Walsh
ADDRESS: Auburn,wa. 98001
EMAIL:

COMMENTTYPE: Problem

PROGRAM: Transfer & Waste Management Plan Review

COMMENTS: The best solution is to remodel algona facility. Why spoil a beautiful area like 28721 West Valley Highway for a new dump. It is a peaceful place to view wildlife. Also why bring more heavy traffic to a site so far from the freeway with a pitiful road. The west hill is a nice residential area which does not need increased traffic when algona is already there & can be upgraded. Trucks moving in & out of this area would be a problem.

IMG_VERIFY: Blue

King County staff: If a reply is necessary, please use the 'Reply All' capability so that the Webmaster is made aware of your response. Thank you.

Sent: 10/19/2013 9:01:28 PM

WOOMER KEN

(COMPETITION SPECIALTIES, INC)

From: Mary King <Mary.King@csi-connect.com>
Sent: Monday, February 03, 2014 4:51 PM
To: kcexec@kingcounty.gov; King County Council; Yates, Diane
Subject: Opposition to the North Auburn Garbage Site

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary.

Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Sincerely,

Ken Woomer, President
Competition Specialties, Inc. | 2402 W Valley Hwy N | Auburn, WA 98001
253-833-6211



From: Steve Wright <swright711@comcast.net>
Sent: Sunday, January 26, 2014 4:46 PM
To: Yates, Diane
Subject: No North Auburn Dump

I am writing to oppose the siting of a new \$127 million transfer station at 28721 West Valley Highway in Auburn. I agree with the county's own evaluation that the North Auburn site is the least desirable of all possible South King County alternatives.

To maximize cost-effectiveness, environmental sustainability, flexibility and innovation, I urge King County to study other transfer station options and combinations of alternatives beyond what has been considered to date.

The county has already spent \$300 million to build new transfer stations at Vashon Island, Shoreline and Bow Lake (and plan a fourth in Factoria) in just seven years. As a result, we are not faced with a dire transfer station capacity problem — now or in the foreseeable future. Rather, we have capacity in the system and the ability to be flexible, innovative and fiscally responsible.

I especially urge the county to more fully evaluate renovating and expanding the existing Algona transfer station. County evaluations show that improving the Algona site would cost roughly \$8 million, rather than the \$127 million budgeted for a site in North Auburn — and the county owns 16 acres of undeveloped land adjacent to the current Algona facility.

Several key studies and recommendations are still in process and should be finalized and addressed before a major new investment of public funds is made. There is no need to be hasty, rush ahead and build yet another multi-million dollar transfer station before fully evaluating whether it is necessary. Consistent with King County's goal of 'Zero Waste' by 2030, the South King County Transfer Station plan needs additional flexibility and innovation to help decrease overall demand in South King County and maximize existing investments.

Thanks very much for your interest and concern. I look forward to hearing from you how King County will move forward in an economically and ecologically sound way.

Steve Wright