



CITY OF KIRKLAND

Department of Public Works

123 Fifth Avenue, Kirkland, WA 98033 425.587.3800

www.kirklandwa.gov

MEMORANDUM

To: Kurt Triplett, City Manager

From: Kathy Brown, Public Works Director
John MacGillivray, Solid Waste Programs Supervisor

Date: October 26, 2015

Subject: Council Briefing – King County Solid Waste Transfer Station Plan

RECOMMENDATION

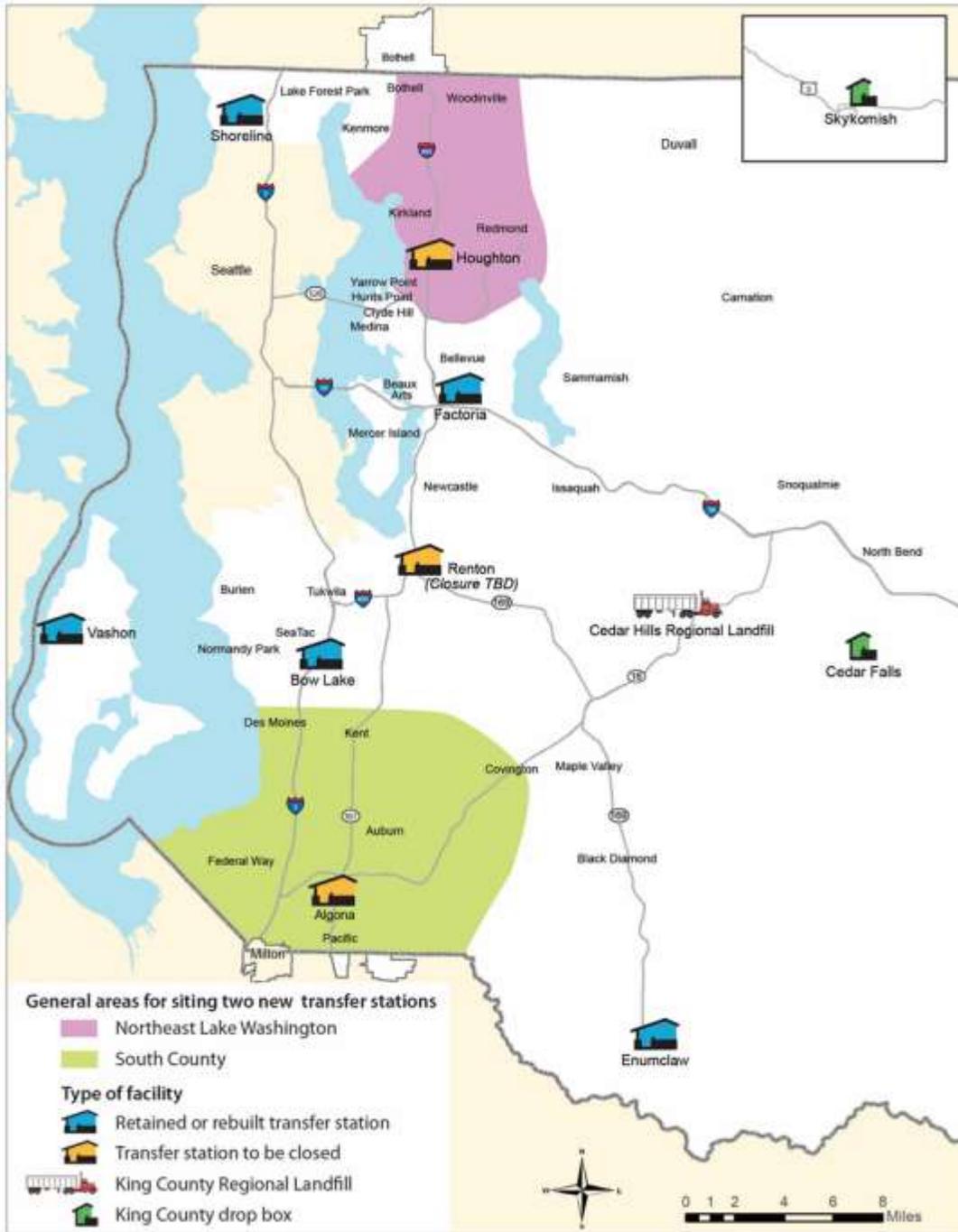
It is recommended that the City Council receive a briefing on the King County Solid Waste Transfer Plan, and how the plan and upcoming King County Council Action could affect eastside cities, including Kirkland.

THE KING COUNTY TRANSFER SYSTEM

Until the late 1950's, solid waste in King County was dumped into fifteen open, unlined landfills. These landfills were forced to close in the late 1950's and early 1960's because they were in the construction paths of I-5 and I-405. At the same time in the early 1960's, the Cedar Hills Regional Landfill was opened, and King County began to develop the regional transfer station system for cities other than Seattle (which operates its own system) to more efficiently consolidate waste at various delivery points before final transport to the landfill. Eventually the transfer station system grew to the eight transfer stations shown in *Map 1* below that exist today. One of these eight is the Houghton Transfer Station (HTS) in Kirkland.

In August, 1988, the City of Kirkland signed a Solid Waste Interlocal Agreement (ILA) which established a solid waste management plan between Kirkland and King County. The original 40-year ILA remained in effect through June 30, 2028. In 2012, the Kirkland, along with 31 other cities, extended its ILA with the County through 2040. The ILA extension gave the County reliable future rate revenue to back long-term bonds to fund its original transfer station capital improvement program that, when completed, would result in the construction of a new NE County station to replace Houghton. The City of Bellevue and the four "Point Cities" elected not to sign the extended ILA and their agreements will expire in 2028.

The ILAs, both old and new, list the general obligations of the cities and King County. Each of the 37 cities with an ILA are responsible for collecting the solid waste produced within its boundaries and contractually directing its hauler to dispose of the waste at King County transfer facilities for a fee (tipping fee). In return, the County is responsible for owning and maintaining the transfer stations, transporting waste from each transfer station to the landfill, and managing the operation and long-term maintenance of the landfill. Further, the agreement designates King County as the "Planning Authority" which, in close collaboration with its cities, must produce and periodically update a Comprehensive Solid Waste Management Plan. Any substantial updates to the Comprehensive Plan must be approved by cities. The current Comprehensive Plan update is tentatively scheduled to be out for city approval some time in 2017.



Map 1: King County Transfer System Plan (2006)

BACKGROUND AND DISCUSSION

The King County-owned and operated Houghton Transfer Station (HTS) in Kirkland has a long and storied history and King County has been contemplating the closure of the facility for the past two decades. The HTS property was first an open dump site between the 1940's and 1960's. In 1965, King County closed the dump and opened the station. In 1992, the Comprehensive Solid Waste Management Plan, proposed replacing the station with a new station at a different location. Unfortunately, in 1995, the rate proposal submitted by the King County Solid Waste Division (KCSWD) was rejected and the KCSWD was directed to continue to operate the existing network of transfer stations which included HTS remaining at its current location.

2005 Memorandum of Understanding

In 2004, the Metropolitan King County Council (MKCC) directed the KCSWD via a budget proviso to negotiate a Memorandum of Understanding (MOU) with the City of Kirkland to mitigate the impacts of the station on the surrounding neighborhood. The proviso prohibited the KCSWD from initiating its capital improvement project to replace the roof until an MOU was duly executed between the two parties which required the KCSWD to expend at least \$150,000 on neighborhood mitigation projects.

In August 2004, the City formed a Solid Waste Subcommittee Task Force comprised of members of the Kirkland City Council, City staff, and Neighborhood Association leaders to negotiate the MOU with the KCSWD. In November 2004, the Kirkland City Council adopted the Revised Houghton Transfer Station Position Statement which stated Kirkland's goal of closing HTS. The statement also listed several mitigation measures that the City expected the KCSWD to implement while the station remained open.

In October of 2005, an MOU between the City and the KCSWD was approved by the Kirkland City Council with the passage of Resolution R-4527. The non-legally binding MOU provided that the KCSWD would proceed with several mitigation projects and measures at the station to include:

1. Replacement of the transfer building roof
2. Installation of a gravity sewer line
3. Construction of a sound wall
4. Changes to traffic controls
5. Construction of an asphalt pathway on the north side of NE 60th St
6. Landscaping improvements
7. Reducing the solid waste at the station to a maximum annual tonnage of 135,000 tons/year over a ten year period (not met)
8. Prohibiting the overnight parking of full or partially full trailers

The MOU also stated the KCSWD's commitment to close the HTS:

MOU Proviso 1

"King County Solid Waste Division agrees to abide by the [Solid Waste Transfer] Waste Export System Plan adopted by the King County Council approved by the King County Executive and codified in King County Code." **The 2006 Transfer Plan explicitly**

recommends Alternative 1 which calls for the closure of HTS after the KCSWD’s transfer station capital improvement project is completed.

MOU Proviso 7

“King County shall honor the Comprehensive Solid Waste Management Plan policy RTS-3, which states, ‘The county should focus capital investment in part to expand, relocate, or replace, or any combination thereof, transfer stations when safety, efficiency, capacity, or customer services needs cannot be met by existing transfer facilities’”. **In the level-of-service criteria examination of the HTS, the station failed to meet established safety goals, efficiency and capacity needs, and some key customer service standards. Accordingly, the [2006] Transfer Plan recommends the closure of the facility upon completion of the KCSWD’s transfer station capital improvement project.**

2006 Solid Waste Transfer and Waste Export Plan

Concurrent with the MOU negotiations, the Metropolitan Solid Waste Advisory Committee (MSWAC) worked with the KCSWD on the development of the aforementioned [Solid Waste Transfer and Waste Export System Plan](#). MSWAC is an advisory committee composed of representatives from cities with Solid Waste Interlocal Agreements with King County. MSWAC advises the King County Executive and King County Council on all matters related to solid waste management. The committee functions under King County Ordinance No. 14971 and an Interlocal Agreement as an advisory body. The work of the committee includes review of the development of the Comprehensive Solid Waste Management Plan, Transfer Plan, updates on legislation, discussion of recycling and waste reduction policies and more. MSWAC members are staff and elected officials, representing cities that participate in the county’s regional solid waste system. Deputy Mayor Penny Sweet is the City of Kirkland’s voting representative on the MSWAC.

In February 2006, the KCSWD published its [Transfer and Waste Export Facility Plan 4th Milestone Report](#) as a precursor to the final Transfer Plan. In the milestone report, several Transfer System Packages for an updated transfer system were presented for consideration. Some of the alternatives called for keeping the HTS open as a self-haul-only facility. Ultimately, however, MSWAC and King County jointly selected Package 1 which is the final recommendation made in the Transfer Plan transmitted to the MKCC in September 2006 and shown below in *Table 1*. The recommendation calls for new stations to be constructed on-site at Bow Lake and Factoria and new facilities to be sited and constructed in South King County (to replace a closed Algona station) and in Northeast King County (to replace a closed HTS). This option also included the closure of the Renton Transfer Station upon the completion of the Transfer Plan.

Table 1: Status of 2006 Transfer Plan Implementation		
Facility	Plan Recommendation	Status
Shoreline Transfer Station	Build New Station On-Site	Opened 2009
Bow Lake Transfer Station	Build New Station On-Site	To Open October 2013
Factoria Transfer Station	Build New Station On-Site	Design – Begin Construction 2014
South King County	Site & Build New/Close Algona	In Siting Process
Northeast King County	Site & Build New/Close Houghton	Begin Siting Process in 2014
Vashon Transfer Station	Retain	Newer Facility – No Change
Enumclaw Transfer Station	Retain	Newer Facility – No Change
Cedar Falls	Retain	Drop Box Facility
Skykomish	Retain	Drop Box Facility

Algona Transfer Station	Close	Open Until South King County Built
Houghton Transfer Station	Close	Open Until Northeast County Built
Renton Transfer Station	Close	Open Until Plan Complete

2007 Third Party Review of the Transfer Plan

MSWAC conditionally approved the Transfer Plan pending the outcome of the [Independent, Third Party Review of the Solid Waste Transfer and Waste Export System Plan](#) which was completed by consultant Gershman, Brickner, and Bratton (GBB) in September 2007. In general, the GBB review supported the Transfer Plan and supported the modernization of the transfer station system.

2011 King County Performance Audit

In 2011, the KCSWD underwent a performance audit by the King County Auditor which focused upon the KCSWD's rate model/financial plan and its transfer system capital projects. The [King County Performance Audit of Solid Waste Transfer Station Capital Projects](#) audit concluded that the Transfer Plan was developed through a collaborative and iterative regional process and that some collective decisions, such as electing to construct new transfer stations in lieu of renovating existing stations, have resulted in increased systems costs. The audit also recommended that the KCSWD should update its 2006 Transfer Plan by including analyses of cost impacts of the number and capacities of the transfer stations; functionalities of the transfer stations; and an assessment of project financing and delivery methods.

TRANSFER PLAN REVIEW PARTS 1 AND 2

2010-2012 Solid Waste Interlocal Agreement Background

Over the course of 2010-2012, King County and MSWMAC worked together to negotiate an extension the *Solid Waste Interlocal Agreement of 1988* (original ILA), which every City in King County, excluding Seattle and Milton, has signed. In 2010, the City of Kirkland played a significant role in initiating the ILA renegotiation process as a means to ensure that the County's capital improvement program would be fully funded and implemented and, consequently, the HTS would be replaced with a more appropriately-sized and modern transfer facility somewhere in northeast King County.

After intensive negotiations, a team of City and County representatives reached an agreement on the terms of a new ILA. This agreement extended the original ILA by 12.5 years, from June 2028 through December 2040, which will keep disposal rates lower by allowing for longer-term bonding for capital improvement projects. In February 2013, the Kirkland City Council voted to authorize the City Manager to sign the extended ILA through 2040. To date, 32 of the 37 King County cities have signed the new ILA. The cities of Bellevue, Medina, Clyde Hill, Hunts Point, and Yarrow Point have elected not to sign and their agreements with the KCSWD will expire in 2028.

Transfer Plan Review Part 1

When the City of Bellevue did not extend its ILA with King County, a number of cities and stakeholders began to call on the KCSWD to conduct a full review of the remaining Transfer Plan projects due to the anticipated 50% reduction in tonnage directed to a new Factoria after 2028 when Bellevue leaves the system and in light of one of the key finding findings of the 2011

Performance Audit that concluded "...by the time the [new] stations reach the end of their expected useful lives, collectively they will be utilizing about 42 percent of their total capacity."

In March 2013, the Sound Cities Association (SCA) adopted a policy position requesting that the KCSWD and MSWAC review and recommend appropriate updates to the Transfer Plan. Subsequent to this request, the MKCC took preventative action and adopted [Ordinance 17619](#) which compelled the KCSWD to conduct a full review of the Transfer Plan before allocating any more than \$750,000 in funding toward the Factoria construction project. The [final report](#) was transmitted to the MKCC in November 2013.

The report recommended the KCSWD should continue with construction of a new Factoria Transfer Station and further study two alternatives to constructing a new Northeast Recycling and Transfer Station (NERTS). Alternative E1 would divert commercial haulers to underutilized stations such as Shoreline and E2 would limit self-haul transactions at Factoria. In [Motion 14145](#), the MKCC instructed the KCSWD to further evaluate Alternatives E1 and E2 and explore strategies to manage transactions across the NE County in the absence of a new NERTS.

During the comment period and subsequent to the transmittal of the final report to the MKCC, the Kirkland City Council passed [Resolution R-5001](#) on September 3, 2013 which expressed the Council's position concerning the timely closure of the Houghton Transfer Station and [Resolution R-5031](#) on February 4, 2014 which reaffirmed the Council's demand that the Houghton Transfer Station be closed by 2021. Further, MSWAC passed a motion on May 9, 2014 which expressed support for a review of an array of strategies to manage transactional demand and for the closure of Houghton by 2021.

Transfer Plan Review Part 2

Per MKCC direction, the KCSWD transmitted the final [Transfer Plan Review Part 2 Report](#) to the MKCC on June 30, 2015. In the draft report, the KCSWD suggested that a new NERTS would not be required in the future. During the comment period, several cities including Kirkland, requested that the County re-evaluate its position on the NERTS and retain it as a future alternative. In May 2015, Mayor Walen sent the attached letter to Executive Constantine concerning Kirkland's request to keep a NERTS as viable future option for the region. In response, the Final Transfer Plan Review Part 2 recommends the following:

- Do not build a NERTS at this time, but keep it as an option for a future potential facility.
- Develop and test the following demand management strategies :
 - Conduct a pilot program to test the effectiveness and potential impacts of using demand management strategies, including web cameras to inform customers of station activity in real time.
 - Work with private industry customers and stakeholders to develop a low-cost bulky item collection pilot in target regions of the County by May 2016.
 - Research point of sale needs to support differential pricing for transactions at the transfer stations and identify implementation needs by May 2016. Implement necessary technology changes by September 2017.

- In 2017, begin a 12-month pilot to test the effectiveness and potential impacts of extended hours and incentive pricing. Following the pilot, transmit a report and recommendation to Council in March 2019.
- Identify the steps needed to achieve 70 percent recycling rates.

Analysis of the Transfer Plan Review Part 2 Report

The Transfer Plan Review Part 2 indicates that there is enough capacity to manage the tonnage in the NE County without a new NERTS. However, there exists a “transactional bottleneck” and the system is not able to manage all of the daily transactions without implementing certain untested demand management strategies (DMS) in conjunction with either diverting commercial traffic to Shoreline or limiting self-haul hours at Factoria.

The DMS include strategies that may have varying effects upon transactional throughput:

- Extend operating hours
- Incentive/peak pricing
- Provide on-line wait time information
- Mandatory curbside garbage collection
- Lower curbside bulky waste collection
- Higher minimum fee
- Lower regional direct rate
- No Household hazardous waste collection at Factoria
- Ban materials from disposal and recycling
- Add scales and queueing lanes
- Add stalls and increase tipping floor capacity
- Provide unloading assistance

If the demand management strategies (DMS) to mitigate transactions in the absence of a NERTS are implemented in 2019, northeast County residents and businesses will be provided with a substantially lower level of service at a relatively higher cost to our ratepayers. For example, per the Transfer Plan Review report, service times and queue lengths at the Factoria and Shoreline Transfer Stations will periodically increase to intolerable levels regardless of the success of DMS.

Alternatively, if DMS do not achieve their goals, as staff contends they may not, after a prolonged pilot process culminating in March 2019 then, by implication, the northeast County will have to wait for a new NERTS to be sited, designed, and built – a process which can take 7-10 years. Optimistically, a new station could not be placed into service until 2026, well beyond the current projected 2023 closure of Houghton as proposed by the County and the 2021 promised date of Houghton closure.

In partnership with other eastside cities to include Bellevue, Bothell, Renton, and Lake Forest Park, Kirkland staff has been steadfast and consistent in making the following assertions to MSWAC and its regional partners to ensure that Houghton is closed no later than 2023. These positions are included in the draft MSWAC motion (*Attachment 2*) which is scheduled to be considered as an action item by MSWAC at its November 13 meeting. The Solid Waste Advisory Committee (SWAC) has already passed a motion which is included at the end of the MSWAC motion for reference.

- 1. A new NERTS must be retained as an option for the future.**
- 2. As a contingency, immediately begin identifying preliminary siting criteria and a siting process for a new NERTS to run concurrently with the testing of DMS. Identify alternative sites and prepare an Environmental Impact Statement for the transfer station project.**

While the County asserts a new NERTS is not needed now but remains as an option for the future, nothing precludes the County from beginning a siting process as a sensible contingency to hedge against the potential infeasibility or ineffectiveness of some or all of the DMS. Staff recommends that the County begin a siting process for a new NERTS immediately and run the process concurrent with any DMS pilot process. If the DMS do not prove to be effective, two years or more will be saved on the NERTS timeline and the County will already have several approved and suitable alternative locations for a new transfer station.

3. The County should expedite the DMS pilot process and report findings and recommendations back to the King County Council no later than January 2018.

In order for the DMS to fully mitigate and disperse transactions in the northeast County, each strategy must work at its optimum efficiency and seamlessly integrate with and complement other strategies. Strategies with the most potential impact such as mandatory curbside service will be extremely difficult to implement countywide due to strong opposition from several cities and variable pricing and higher minimum fees may be open to legal challenge.

In the event DMS do not prove to be effective after the pilot concludes in 2019 and it is determined that the County has no other alternative than to build a NERTS, Houghton would remain open until at least 2026 as the County undertakes a siting (2+ years) and a design build/process (5+ years). If the County insists upon conducting a pilot to test the effectiveness and impacts of DMS, we believe that the pilots and analysis should conclude no later than January 2018 so a new facility could be built and come online by 2023.

Further, Kirkland staff and its regional partners have identified several other key issues with the Transfer Plan Review:

- **Regional equity is not achieved:** The Transfer Plan Review is inconsistent with the County Code requirement for regional equity in siting transfer stations. The result will be that one area of the County will absorb an undue share of impacts. Of particular concern is that the proposals are inconsistent with the Factoria Transfer Station Conditional Use Permit, and Bellevue has indicated it will be enforcing those provisions in the permit as necessary.
- **Disproportionate impacts:** The concepts and strategies relied upon will result in disproportionate impacts across the County, creating a two-class transfer station system with inconsistent and unfair policies, services and rates across the system. The northeast portion of the County will be underserved due to restricted self-haul and recycling opportunities. It will be overburdened with increased traffic and negative environmental impacts to air quality and noise. Higher fees and rates, both at the transfer stations and through increased costs to local collection contracts due to longer hauling distances and traffic congestion, will also disproportionately impact the northeast County. The fees and rates paid by customers in northeast King County will be supporting higher levels of service and increased capital investments in other parts of the County, but not in the northeast.
- **Assumptions and mitigation strategies do not appear to be viable:** The Transfer Plan Review is based on a combination of assumptions and strategies that are untested. Regional support for sweeping policy changes is uncertain at best. This is particularly true for the County's assumption that the region will reach a 70% recycling rate based on

behavioral changes that are notoriously hard to influence. Even if all of the mitigation strategies are successfully implemented, there is no data to support the County's conclusion that the operational and policy changes will fully mitigate the premature decision to not build a new northeast station, and there is no contingency plan if the strategies fail.

- **Self-haul impacts are not adequately addressed:** The proposed strategies did not adequately consider impacts to large institutional self-haulers or small business owners. The Plan fails to consider that self-haulers includes large institutions that run their own collection, such as cities, school districts or Boeing. Self-haulers also include small business landscape companies that depend on easy access to self-haul at the end of each business day. These stakeholders need to be specifically targeted to identify concerns and obtain buy-in to the proposed restrictions and rate impacts.
- **Exacerbated Social Inequities:** The April 2015 edition of the King County bulletin titled "Building Equity and Opportunity" notes serious equity and social justice (ESJ) concerns in King County. The bulletin summarizes inequities by zip code in terms of education, good health, diversity, employment, household income and life expectancy. The bulletin identifies the areas with the lowest "quality of life" indicators to be southwest King County and the area of King County in the northwest, bordering Snohomish County. King County's ESJ Initiative seeks to address these inequities, yet the Transfer Plan Review sites nearly all of its garbage transfer stations precisely in these disadvantaged communities. The concept appears to be a policy that hauls garbage from affluent, thriving areas of the County to the County's disadvantaged areas. Additionally, as mentioned above, the added haul times and inequitable fee structure will be particularly hard on small and disadvantaged businesses.
- **Negative Impact on the Regional Transportation System:** The concentration of transfer stations in the southern and northern ends of western King County will add to traffic along the north-south corridor of the Puget Sound Region. Additionally, the fee structure will encourage individual haulers to travel further distances at peak traffic hours to avoid peak fee times at the Factoria and Houghton stations. These trips will adversely affect pass-through cities near existing transfer stations that may maintain lower rates, such as Bothell, Kenmore, and Lake Forest Park.
- **Environmental Sustainability:** Although the entire plan is premised upon achieving the lofty goal of 70% recycling, the path forward will serve to *discourage* recycling in northeast King County, by not providing the expanded recycling services available at new transfer stations to those residents living in the northeast area of the County.

NEXT STEPS

As mentioned above, although the Northeast Transfer Station remains as an option in the Transfer Plan Review Report, Solid Waste Staff has formally briefed the King County Council, with strong and clear statements that a Northeast Transfer Station is not needed. A King County Auditor's report has concurred with this conclusion. The King County Council is in the process of reviewing the Plan for final adoption.

To ensure that the Northeast Transfer Station remains a viable option for the Eastside in the future, and to make sure that cities' concerns about the analyses in the Plan are addressed, MSWAC is considering adopting formal motion to provide clear feedback to the King County

Council. Leadership in the King County Department of Natural Resources and Parks (DNRP) Director's Office has expressed an interest in working with MSWMAC representatives and staff to jointly draft a motion that will address the cities' concerns, without creating an undue burden of intense analysis, and without excessively delaying the King County Council's approval process. Additionally, the King County Auditor's Office is willing to work with Eastside city staff to revisit the assumptions and findings in their report.

Staff continues to work with the DNRP Director's Office and King County Auditor's Office to forge a path forward that will address Kirkland and other MSWMAC cities' concerns.



May 13, 2015

Dow Constantine, King County Executive
King County Chinook Building
401 Fifth Ave, Suite 800
Seattle, WA 98104

RE: Comments on Transfer Plan Review Part 2 Draft Report

Dear Honorable Constantine:

In response to the request for comments on the Transfer Plan Review Part 2 Draft Report (“Transfer Plan Review”), several City stakeholders, including the City of Kirkland, have written you a letter, strongly urging King County to retain the option of a new Northeast Recycling and Transfer Station (NERTS) as a potential future facility in the Solid Waste Comprehensive Plan. This letter re-iterates the common concerns of stakeholders and provides feedback from the City of Kirkland on broader policy issues.

Impacts to Solid Waste Handling System

As stated in the joint letter from the Cities, retaining this option in the Transfer Plan Review ensures that upon closure of the Houghton and Renton Transfer Stations, there are sufficient facilities capable of handling the future tonnage and traffic generated in the northeast region of the County in an efficient and equitable manner. It is our opinion that the mitigation strategies suggested in the Transfer Plan Review may not accomplish this goal.

Without the option of a NERTS, the negative impacts to the remaining transfer stations, traffic, the environment, regional equity, system efficiency, local collection rates and station users could be significant and unacceptable, including the following:

- **Regional equity is not achieved:** The Transfer Plan Review is inconsistent with the County Code requirement for regional equity in siting transfer stations. The result will be that one area of the County will absorb an undue share of impacts. Of particular concern is that the proposals are inconsistent with the Factoria Transfer Station Conditional Use Permit, and Bellevue has indicated it will be enforcing those provisions in the permit as necessary.
- **Disproportionate impacts:** The concepts and strategies relied upon will result in disproportionate impacts across the County, creating a two class transfer station system with inconsistent and unfair policies, services and rates across the system. The northeast portion of the County will be underserved due to restricted self-haul and recycling opportunities. It will be overburdened with increased traffic and negative environmental impacts to air quality and noise. Higher fees and rates, both at the transfer stations and through increased costs to local collection contracts due to longer hauling distances and traffic congestion, will also disproportionately impact the

northeast County. The fees and rates paid by customers in northeast King County will be supporting higher levels of service and increased capital investments in other parts of the County, but not in the northeast.

- **Assumptions and mitigation strategies are untested and results are uncertain:** The Transfer Plan Review is based on a combination of assumptions and strategies that are untested. Regional support for sweeping policy changes is uncertain at best. This is particularly true for the County’s assumption that the region will reach a 70% recycling rate based on behavioral changes that are notoriously hard to influence. Even if all of the mitigation strategies are successfully implemented, there is no data to support the County’s conclusion that the operational and policy changes will fully mitigate the premature decision to not build a new northeast station, and there is no contingency plan if the strategies fail.
- **Self-haul impacts are not adequately addressed:** The proposed strategies did not adequately consider impacts to large institutional self-haulers or small business owners. King County has failed to consider that self-haulers includes large institutions that run their own collection, such as cities, school districts or Boeing. Self-haulers also include small business landscape companies that depend on easy access to self-haul at the end of each business day. These stakeholders need to be specifically targeted to identify concerns and obtain buy-in to the proposed restrictions and rate impacts.
- **Continued Delay in the Closure of the Houghton Transfer Station:** The Cities of Kirkland and Bellevue are particularly dismayed at yet another proposed delay in the closure of the Houghton Transfer Station. As Metropolitan King County Council Member Jane Hague so eloquently stated during Transfer Plan Review Part 1 deliberations in 2014 concerning the County’s commitment to closing the Houghton Transfer Station (HTS), “A promise made is a promise kept.” Over the past decade, we have waited patiently—but not without growing concern—as the projected closure date of the Houghton Transfer Station has slipped from 2016 to 2018 to 2021. In September 2013 and February 2014, the Kirkland City Council expressed its desire that the transfer station be closed by 2021. In May 2014, the Metropolitan Solid Waste Advisory Committee (MSWAC) representing all of the cities in the King County solid waste system, adopted a motion supporting the closure of Houghton Transfer Station no later than 2021. By the County’s own admission, the facility is outdated, inefficient, not supportive of the County’s recycling goals, and is located in a residential area inconsistent with station’s industrial use. In spite of the past promises, the clear voice of the MSWAC, and the County’s own assessment of the facility, the County is now proposing to delay the closure of the Houghton facility until as late as 2023.

Inconsistencies with King County Policy

As stated in the prologue to King County’s Strategic Plan, the Strategic Plan was created to “reflect the values and priorities of the people of King County.” The Strategic Plan motto is, “Working together for one King County.” The motto is intended to reflect the County’s

commitment to working in partnership with others, including local governments. We feel that the “collaboration” effort associated with the Draft Solid Waste Transfer Station Plan failed to meet the spirit of the King County Strategic Plan. In fact, we feel blindsided by the recent conclusion to exclude a NERTS from consideration. Our staffs and elected officials have participated in good faith in the numerous MSWAC meetings where the Transfer Plan Review has been discussed over the past several months. In every meeting, we were given to believe that the option of a NERTS would remain in the Transfer Plan Review, and that King County supported retaining that option. It was not until mid-April, *after* your transmittal of the Draft Plan to the King County Council, that MSWAC was given a presentation by King County staff, unveiling the County’s position that the option of NERTS was unnecessary.

In addition to the process, we note the following items that are inconsistent with King County’s Strategic Plan:

- **Exacerbated Social Inequities:** The April 2015 edition of the King County bulletin titled “Building Equity and Opportunity” notes serious equity and social justice (ESJ) concerns in King County. The bulletin summarizes inequities by zip code in terms of education, good health, diversity, employment, household income and life expectancy. The bulletin identifies the areas with the lowest “quality of life” indicators to be southwest King County and the area of King County in the northwest, bordering Snohomish County. King County’s ESJ Initiative seeks to address these inequities, yet the Transfer Plan Review sites nearly all of its garbage transfer stations precisely in these disadvantaged communities. The concept appears to be a policy that hauls garbage from affluent, thriving areas of the County to the County’s disadvantaged areas. Additionally, as mentioned above, the added haul times and inequitable fee structure will be particularly hard on small and disadvantaged businesses.
- **Negative Impact on the Regional Transportation System:** The concentration of transfer stations in the southern and northern ends of western King County will add to traffic along the north-south corridor of the Puget Sound Region. Additionally, the fee structure will encourage individual haulers to travel further distances at peak traffic hours to avoid peak fee times at the Factoria and Houghton stations. These trips will adversely affect pass-through cities near existing transfer stations that may maintain lower rates, such as Bothell, Kenmore, and Lake Forest Park.
- **Inadequate Analysis to Support Fiscal Responsibility:** The cost analysis in the Transfer Plan Review did not provide a reasonable comparison of the alternatives. We request that the following be added:
 - Compare the total net increase in operating costs for all concepts, adjusted for inflation over the 40+ year life of a new facility so the estimated cost of each “No Build” concept can be compared apples-to-apples with the capital cost of a new NERTS.
 - Include the cost of each concept in terms of its effect on the average King County resident’s monthly garbage bill.
 - Update the projected annual operating costs for the “No build” concepts to reflect Bellevue’s recent decision to remain in the system after 2028.

- Provide greater detail on the capital cost assumptions for the NERTS, and allow time for a peer review of the capital cost assumptions.

Environmental Sustainability: Although the entire plan is premised upon achieving the lofty goal of 70% recycling, the path forward will serve to *discourage* recycling in northeast King County, by not providing the expanded recycling services available at new transfer stations to those residents living in the northeast area of the County.

In summary, the Transfer Plan Review contains significant service impacts to all of northeast King County that have neither been adequately addressed nor vetted with stakeholders. The conclusions associated with the draft report are in direct conflict with many of King County's regional public policies. We urge the County to carefully consider the future and plan a system that provides a geographically balanced, flexible system of transfer stations that is able to meet the needs of a growing County without placing undue burden on some communities and segments of the population.

Sincerely,



Amy Walen
City of Kirkland Mayor

cc: Mayor Claudia Balducci, City of Bellevue
Mayor Richard Leider, Town of Beaux Arts Village
Mayor George Martin, City of Clyde Hill
Mayor Joshua Freed, City of Bothell
Mayor Joe Sabey, Town of Hunts Point
Mayor Patrick Boyd, City of Medina
Mayor Steven J. Buri, City of Newcastle
Mayor Denis Law, City of Renton
Mayor Dicker Cahill, Town of Yarrow Point
Bellevue City Councilmembers
King County Councilmembers
Brad Miyake, Bellevue City Manager
Diane Carlson, Director of Regional Initiatives, King County Executive
Christie True, Director, Department of Natural Resources and Parks (DNRP)
Bob Burns, Deputy Director, DNRP
Pat McLaughlin, Director, Solid Waste Division, DNRP
Kevin Kiernan, Assistant Division Director, Solid Waste Division, DNRP
Diane Yates, Intergovernmental Liaison, Solid Waste Division, DNRP
Marilynne Beard, Deputy City Manager, City of Kirkland
Tracey Dunlap, Deputy City Manager, City of Kirkland
Kathy Brown, Public Works Director, City of Kirkland
John MacGillivray, Solid Waste Program lead, City of Kirkland
Kurt Triplett, Kirkland City Manager

Metropolitan Solid Waste Management Advisory Committee (MSWMAC)

Transfer Plan Review Part 2 Final Report Motion

MSWMAC is reviewing and discussing the King County Solid Waste Division Transfer Plan Review Part 2 Final Report, including the fact that the data and analyses presented in the Final Report appear largely unchanged from the Draft Report and that many cities expressed concerns regarding the strategies presented in the Draft Report, and therefore:

MSWMAC moves that the King County Solid Waste Division undertake the following:

- Retain a new northeast transfer station in the King County Solid Waste Comprehensive Plan, and as a contingency, begin a preliminary siting process for the new facility in 2016 in order to ensure the timely closure of Houghton Transfer Station, regional equity, environmental protections, system efficiency, and minimal impacts to the local and regional transportation system. (Note: see 8/21/15 *SWAC Adopted Motion below)
- Prepare an analysis that addresses the critical concerns and issues raised by stakeholder comments on the Draft Report to ensure the policies and/or demand management strategies achieve the expected goals without negative impacts prior to including any Draft Report policies or demand management strategies in the King County Solid Waste Comprehensive Plan.
- Prepare an analysis regarding compliance with the Conditional Use Permit for the Factoria Transfer Station.

*Adopted SWAC Motion: I move that SWAC recommend Executive and Council approval of the Transfer Plan Review Part 2 Final Report, providing that: (1) building a NE recycling and transfer station has the same priority as demand management strategies in the Comprehensive Solid Waste Management Plan update; (2) the county immediately begins the process of identifying alternative sites for a NE station, and secures a site if feasible; and (3) alternative sites for a NE station are analyzed in the same EIA, and at the same level of detail, as demand management strategies.