



## King County

### Solid Waste Division

Department of Natural Resources and Parks

King Street Center

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April 28, 2014

Brad Miyake, City Manager  
Office of the City Manager  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009-9012

Dear Mr. Miyake:

Thank you for your letter of April 15, 2014, expressing support of the regional solid waste system and your concern on whether a new Northeast Recycling and Transfer Station should be built.

The division agrees that it is premature to take the option to build a Northeast Recycling and Transfer Station off the table and that further analysis is needed. The Solid Waste Division (division) has recommended continued evaluation of operational approaches that would provide service for the northeast county without building a new transfer station and a comparison of trade-offs and benefits with the adopted Transfer Plan; this evaluation would be conducted in collaboration with stakeholders including Bellevue and other cities.

With that in mind, we offer the following answers to your questions.

1. The 2006 Solid Waste Transfer and Waste Export System Plan is an adopted solid waste facility plan that was subject to SEPA, including an Environmental Impact Statement. Can you outline the process that will be used to amend this Plan, including how the Division will address SEPA requirements?

**Answer: Any significant changes to the Transfer Plan would be subject to environmental review under SEPA. At this time, it is not known if a new EIS would be needed or if some other form of environmental review would meet applicable requirements. Changes to the Transfer Plan could be adopted through the comprehensive solid waste management plan process or potentially through amendment to the current Transfer Plan.**

2. The alternatives proposed include various modifications to Factoria (suggested changes have included a second compactor, a second scale and an additional queuing lane) as well as reducing the total planned number of transfer stations in the system. These changes modify assumptions used to issue the current Conditional Use Permit (CUP) approval to rebuild Factoria. Can you explain the process that will be used to ensure compliance with the City's permit conditions that are required to be met for the life of the project?

**Answer: Further analysis of the alternatives would include consideration of the permit conditions and any potential changes that would be required.**

3. The current permit to rebuild Factoria was approved based on a certain number of vehicle trips and certain acceptable traffic levels at the station and on local streets. How would the E1 and E2 alternatives impact the number of vehicle trips (both commercial and self-haul) and traffic on local streets compared to the assumptions in the current permit?

**Answer: The number of vehicles using the Factoria Recycling and Transfer Station would increase under Alternatives E1 and E2. Further analysis of the alternatives and traffic analysis would be needed to determine any additional permit requirements.**

4. It appears that there are several ways to achieve the E1 and E2 alternatives using different operational and other strategies. What specific operational changes and specific assumptions and/or data are being used to analyze each of the alternatives? When do you anticipate this analysis will be available?

**Answer: We agree that there are multiple approaches to implementing E1 and E2. The work to date has identified various options that could be used individually and in combination with others. The recommended next steps are to work collaboratively with our regional partners to determine how to best analyze the probable effectiveness and impacts associated with these options. The division recommends beginning this process with its advisory committees in July 2014. It is anticipated that the analysis and further recommendations would be available within 12 months of the start date.**

5. In addition to traffic impacts to Bellevue as host city to the Factoria Transfer Station, what are the traffic impacts to the surrounding cities and anticipated routes to Factoria?

**Answer: Assuming this question relates to the anticipated impacts associated with E1 and E2, that analysis has not yet been completed. These answers would be anticipated as part of the regional discussion and analysis of implementation approaches and impacts.**

6. Are there plans to provide mitigation to Bellevue for increased traffic, noise, potential program changes to recycling and household hazardous waste service availability, and other impacts that were disclosed and evaluated as a component of the CUP approval?

**Answer: Mitigation would be a consideration as part of any environmental review.**

7. The SWD has discussed modifying the hours of operation at Factoria Transfer Station. This causes us concern about potential noise impacts from Factoria's operations on surrounding neighborhoods. Again, adequate information and data regarding proposed modifications to the transfer station operations must be provided to assess the viability of alternatives E1 and E2.

**Answer:** The Division will work collaboratively with our regional partners to determine how to best analyze the optimal approaches and impacts associated with these options. Any significant changes to the Transfer Plan would be subject to environmental review under SEPA and noise would be a component of any such review. Unlike the current facility, the new recycling and transfer station will be fully enclosed.

8. Both alternatives E1 and E2 fail to meet many of the level of service criteria set out in the original transfer station report? How does the Solid Waste Division propose to maintain the adopted service levels without any degradation of service quality?

**Answer:** This appears to be a reference to Appendix G, which was an early evaluation tool that was replaced and superseded in the final report by the chart comparing impacts of the Base Plan and E1 and E2. The Appendix is of limited utility because the table was structured so that only a system with entirely new stations could meet all service level criteria (and if any station did not meet a particular criterion, the alternative was assigned a "no" for that criterion, even if all other stations satisfied the criterion). Ultimately, the "E" alternatives were determined to be feasible. The projected savings are for capital costs only. The division recommended additional analysis regarding costs comparing E1/E2 (or some combination) and the Base Plan. The Base Plan is more expensive, but also provides higher levels of service.

9. Both alternatives E1 and E2 will lead to greater hauling distances for private companies serving some cities. What is the impact to local collection costs, and will this impact fall disproportionately on some cities and not others? How does the system achieve regional equity in such a scenario?

**Answer:** Some local collections costs would likely increase under E1 as some haulers would be required to make longer routes between collection points and their newly- designated Recycling and Transfer Station. Haulers have also indicated the likely need for additional capital equipment and labor hours under this approach. Local collection costs are negotiated by the cities that may also choose different service options. Further analysis of this issue is anticipated during evaluation of Alternatives E1 and E2 and comparison with the Base Plan.

10. Is there a legal mechanism that allows the County to require private haulers from specific areas to take loads to specific transfer stations?

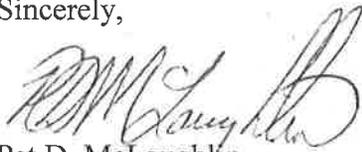
**Answer:** The County Council would need to pass an ordinance to direct haulers to specific transfer stations.

11. Has the SWD undertaken a sensitivity analysis of the risk of underbuilding the system if the County does not reach its recycling goals or if the economy and tonnage rebound?

**Answer:** Although a specific sensitivity analysis has not been completed, the division's projections indicate that there is ample flexibility in the near term. The division conducts ongoing demand monitoring to ensure that sufficient future capacity will be available without overbuilding. The division has recommended that a discussion of the various approaches for addressing long-term future demand should occur in collaboration with the cities.

Thank you again for taking the time to write. If you have any further questions or concerns, please feel free to contact me at 206-477-4501 or by email at [pat.mclaughlin@kingcounty.gov](mailto:pat.mclaughlin@kingcounty.gov).

Sincerely,



Pat D. McLaughlin  
Division Director

cc: Bellevue City Council  
Metropolitan King County Councilmembers  
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