Comments by the City of Bothell
on the
King County 2009 Draft Comprehensive Solid Waste Management Plan

February 4, 2010

The City of Bothell has reviewed and provides the following comments on the King County 2009 Draft Comprehensive Solid Waste Management Plan.

The draft Plan is thorough, well-organized, and quite readable. It explains the elements of the King County solid waste management system and the County goals, policies, and recommendations that are planned to guide these system elements for the next six years.

This Plan is being prepared with the participation of the City of Bothell as one of the 37 cities within its boundaries. Bothell is on the border between King County and Snohomish County; with the City's corporate boundaries encompassing land which is situated in both counties. As manifest in InterLocal Agreement, the City of Bothell chose in 1995 to satisfy its solid waste obligations -- within the service area for the King County system. This agreement gives King County operating authority for transfer and disposal services while indemnifying and holding the City harmless against any claims related to the county's solid waste operations.

Many of the following comments by the City are informed by the City of Bothell's intention to pursue the annexation an arc of unincorporated land north of the existing City limit, in Snohomish County. Successful annexation will be predicated by the development of mutually satisfactory InterLocal Agreement between the City and each county on solid waste issues of concern to all parties.

Specific comments are as follows: ***Suggestions for added language are in red:***

1. Draft Plan page 3-ii Recommendation 15: Action; Continue to support the cities implementation of the plan through the county waste reduction and grant program and allocation of Coordinated Prevention Grant funds from the Washington State Department of Ecology. Make awarding and allocation of such funds transparent and inclusive; include newly annexed city areas.

Rationale: *The City of Bothell and other cities want to include all their residents and workers in their waste reduction and recycling programs. Since they are new participants they may even need special attention.*

2. Modify language on 3-5 in last paragraph, Through Washington's electronics recycling program E-Cycle Washington.

Rationale: We should provide a list of the program name for reference where available.

3. Draft Plan page 3-13: paragraph 3; last sentence: The formula for their allocation includes a base amount plus a percentage based on the city's population and employment; including all newly annexed areas,

Rationale: *The City of Bothell and other cities want to include all their residents and workers, especially the new ones, in their waste reduction and recycling programs.*

4. Draft Plan page 3-34: last sentence on the page: To improve data quality, the division will work with Ecology and cities to improve data reporting through voluntary agreements with recycling companies serving the county and through existing relationships with city programs to assist and incentivize businesses and institutions. This would allow division staff to review data reported to Ecology and work directly with the companies and cities to resolve data inconsistencies.

Rationale: *The City of Bothell and other cities want good data upon which they base their education and promotion services to encourage businesses and institutions to do more and better recycling and to reduce waste. Sometime these information services support non-residential recycling service that is available through a city collection contract.*

5. Draft Plan page 5-5: Address of the Shoreline Recycling and Transfer station

2300 North 165th St.
Shoreline 98133 *not Seattle*

6. Objection to Annexation Language

The Draft Plan provides for three areas of specific concerns for the City of Bothell in regards to Annexation language. The language inhibits a cities ability to annex property in another county creating a major stumbling block for annexation by requiring that all future annexations in other counties be brought under the Plan and that the waste stream from those areas which are currently in another county be directed to King County.

Object to the statement in the last line of the second paragraph on Page 2-3; text needs to be modified to: The ILAs recognize the cities as the designated authority for collection services within their corporate boundaries and require that cities direct solid waste generated and/or collected within those boundaries to the King County transfer and disposal system. This requirement includes areas annexed by a city in an adjacent county and provides that ILAs will specify if and when the solid waste generated in such areas is directed to the King County system.

The first section is the text listed on page 2-17 of the Draft Plan in the bubble. Paragraph 2 needs to be deleted or at the very least modified as follows: The Interlocal Agreements (ILAs) between the cities and the county direct that all municipal solid waste generated and/or collected within a city's corporate boundaries (within King County) be directed to King County's solid waste transfer and disposal system. Those cities with ILAs, annexing new areas that are in an adjacent county would not necessarily add customers to the division's service area and would not necessarily require adjustments to the forecast of solid waste tonnage

Also, the template ILA is not acceptable to the City because it is unclear regarding the effect of annexation in adjacent counties. The City is requesting the ability to be given the opportunity to modify the ILA language from the template to language that meets the needs for future annexation opportunities and clarifies that the City has the ability to continue to dispose of waste generated in newly annexed areas in the annexed county in accordance with that counties plan.

Modify Draft Plan Appendix B; Section 6.2.b.; reference below for edits:
6.2.b. Disposal. The City shall by ordinance designate the County disposal system for the disposal of all solid waste including moderate risk waste generated and/or collected within the current corporate limits of the City and shall authorize the County to designate disposal sites for the disposal of all solid waste including moderate risk waste generated or collected within the current corporate limits of the City, except for solid waste which is eliminated through waste reduction or waste recycling activities consistent with the Comprehensive Solid Waste Management Plan. No solid waste generated or collected within the existing City may be diverted from the designated disposal sites without County approval. Solid waste generated or collected within areas annexed to the City in the future which areas are not part of King County may be disposed of in accordance with any annexation agreements and/or the comprehensive plan of the annexed County.

7. General Suggestions:

Formatting:

- Tabs for sections would be helpful. Put page numbers on all *Policies* and on all *Summary of Recommendation* pages :

  Example: put page numbers: 3–i, 3–ii, 3–iii on the three pages before existing 3-1.
- "3ii-Waste Prevention and Recycling Policies" page has title Waste Prevention and Recycling on the title and no acronym and then the acronym used consistently throughout the chapter. It should have a title of "Waste Prevention and Recycling (WPR)" and then use the acronym only throughout the text. This should be a consisted format throughout the document title and acronym then just acronym.
- Add the words "Product Stewardship" and "Sustainability" to glossary

Research: Draft Plan, Page 5-13 fifth paragraph Level of Services; last line; last sentence:

- Potential materials to be collected at transfer stations (i.e. tires).