CITY OF Federal Way

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2009 Draft Solid Waste Plan Comments
King County Solid Waste Division
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First off, congratulations to KCSWD on another milestone in a thorough and collaborative planning process. Here are two comments on the Comprehensive Solid Waste Management Plan update (KC-COSWMP). Thanks for the opportunity to comment…

1. **Potential Fossil Fuel Usage Reductions**

In the status quo, large amounts of fossil fuels are used in all phases of handling solid waste. To further expand our horizons on collection efficiency, the Plan should outline available options and begin the process of determining potential fossil fuel reductions linked to overall environmental benefits. In sections of the Plan update that focus on collection options, transfer and disposal, the Plan could be more specific in building the groundwork for a more sustainable garbage, recycling, organics, and bulky materials management system. Ideally, the Plan could establish goals and/or the need for more in-depth research to determine how to reduce fossil fuel usage related to all phases of collection, transfer and disposal. The purpose would be to address perceived and actual reductions in collection frequency and/or level of services in conjunction with environmental benefits (increased recycling and decreased fuel use), building upon the study in the City of Renton (referenced on page 4-16).

In tandem with this, the Plan could envision more solutions that match Chapter 4 Recommendation: Collection-General #2 (to increase residential access for bulky materials collection at curbside – expanded on page 4-6) with a potential reduction in self-haul trips to transfer facilities and/or increasing reuse of salvageable cast-offs, which in theory would result in KCSWD customer service & operational savings as well as an overall reduction in fossil fuel inputs. One example could be a “dual-stream” (salvageable + bulky waste) collection approach intended to achieve reduced transaction and facility capacity costs for KCSWD, more ‘reuse’ inputs for non-profit salvage groups, improved coordination between the haulers and these non-profits, higher diversion rates, and lower overall fossil fuel use. Ideally, the resulting savings in KCSWD operations and future facility/export capacity could apply to offsetting costs.

2. **Recyclable Materials – “Value” vs. “Productive Use”**

The Draft Plan update should be revised regarding how recyclable materials are referenced in terms of “value”. In Chapters 3 and 4, the Draft Plan says that recyclables that have value are to be targeted for increased diversion efforts. While the importance of maintaining the potential productive use of collected recyclables by limiting contamination cannot be underemphasized, in practice collected materials have shifting values at different points in the generation/ collection/processing/remanufacturing cycle. At some points of this cycle, that “value” can be

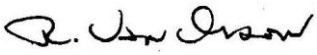
negative, yet it may still make economic sense to recycle the material – for example by considering avoided disposal costs, climate change impacts, the costs and impacts of other alternatives (e.g., primary extracted materials), and other common benefits or objectives.

Further, regarding Policy WPR-1 in Chapter 3, as well as the discussion starting on page 3-25, the Zero Waste concept could be refocused to target on avoiding landfilling of those materials that have "productive use" – regardless of whether they have "economic value" at the point of collection.

Hauling Authority is one other issue that might arise from attaching "value" to the targeted recyclables at the point of collection. In the past, arbitrary definitions linking recyclables to materials with "value" (while the remainder – solid waste – was deemed material "without value") could dictate how targeted materials can be collected in practice. This could in turn alter the economics and options available for collection and diversion, resulting in unintended complications to our main intent: materials diversion for productive use.

In closing, we look forward to the completion of this planning process, and appreciate the many hours of KCSWD and KCC staff time and the efforts of the many representatives on regional committees that contributed to this Draft Plan update, as well as the 2006 Solid Waste Transfer and Waste Export Study that preceded it.

Sincerely,



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cc: Cary M. Roe, P.E., Director of Parks, Public Works, and Emergency Management
Ken Miller, Deputy Public Works Director
Diane Yates, King County Solid Waste Division