Responsiveness Summary

This Responsiveness Summary provides responses from the King County Solid Waste Division (KCSWD) to the questions and comments that were received during the public comment period on the Draft Environmental Impact Statement (Draft EIS) for the Cedar Hills Regional Landfill Site Development Plan. The public comment period lasted from September 30 to November 6, 2009.

The Draft EIS was available for review on the KCSWD Web site, at the KCSWD's office in Seattle, and at five public libraries: Renton Public Library Main Branch, Renton Public Library Highlands Branch, Fairwood Library, Issaquah Library, and Maple Valley Library.

During the comment period, a public hearing was held on October 22, 2009 at the Greater Maple Valley Community Center, with at least 22 members of the public attending. A brief overview was provided by KCSWD staff and their consultant HDR, and members of the public had an opportunity to ask questions. When possible, immediate answers were provided by KCSWD staff and the consultant. A court reporter was present to take individual comments, but did not transcribe the meeting proceedings. Participants were asked to give their comments to the court reporter, write them on a comment form, write a letter, or send them via email or the project website.

The Responsiveness Summary groups the comments/questions by chapter and topic area and provides KCSWD's response. Each comment received is provided in its entirety following the summary. KCSWD received a total of 28 comments, 24 from the public and 4 from agencies. During preparation of the Final EIS, KCSWD considered comments/questions and made modifications to clarify content including incorporating a more comprehensive description of the No Action Alternative. These changes are not substantive and did not alter KCSWD's recommended site development alternative. KCSWD has withdrawn Alternative 4 from consideration; reasons are discussed in Chapter 2 of the Final EIS. Also, the Chapter entitled *Comparative Cost Analysis* has been eliminated from the Final EIS and KCSWD is preparing a separate cost analysis report. If you have any questions about this Responsiveness Summary, please contact:

Mizanur Rahman, Project Manager
King County Solid Waste Division
201 S. Jackson St., Suite 701
Seattle, WA 98104
Telephone: 206-296-8444, TTY Relay: 711
Fax: 206-296-8431
Email: Mizanur.rahman@kingcounty.gov

Thank you for your interest in this project, and for the time and effort spent by those who reviewed and commented on the Draft EIS, or attended one of the public meetings related to this project.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 2: Alternatives		
1. No action alternative and its environmental impacts	• Mimi Dickens • Sean Kronberg • Mike Krzycki	A more detailed description of the no action alternative is included in Chapter 2 of the Final EIS.
2. Excavation of solid waste from unlined areas	• Tammy Sacayanan SEPA Coordinator, Department of Ecology, NW Regional Office • Bill Lasby, Supervisor Public Health - Seattle & King County (Public Health) • Dennis Griffin • Mike Krzycki • Sean Kronberg • Leslie Morgan *et al.**	All of the alternatives include the provision to excavate soil and solid waste from the unlined South Solid Waste Area and to place the waste in a lined cell. Excavation of the SE Pit Refuse Area is an optional element of Alternatives 1, 2, and 3. If the King County Solid Waste Division (KCSWD) decides to move forward with the excavation, it would obtain any necessary permits and prepare an operational plan that addresses potential impacts. The operational plan would consider appropriate methods/techniques to excavate solid waste under wet conditions, the handling of leachate, the separation of soil for cover material from solid waste, and other potential environmental issues. Public Health – Seattle & King County (Public Health) provides permit conditions for the site that define the constituents to be tested and how tests would be conducted, including soil testing at different depths. KCSWD has done similar solid waste excavation work in the South Solid Waste Area and at transfer stations with no impacts.
3. Soil surcharging and stockpiling	• Tammy Sacayanan SEPA Coordinator, Department of Ecology, NW Regional Office • Bill Lasby, Supervisor Public Health - Seattle & King County (Public Health) • Sean Kronberg	Before stockpiling on the top of Area 5, KCSWD completed an assessment of the capabilities of the environmental systems to accommodate the additional soil stockpile load. That assessment determined that stockpiling would not negatively affect the gas collection system or stormwater management. Subsequent experience with stockpiling soil on top of Area 5 confirmed that even with the high rate of settlement, there were no impacts to the environmental control systems. There were no noticeable variations in the gas flow before and after the soil surcharge. The gas wells are monitored weekly and the cover system is inspected during quarterly monitoring for fugitive gas emissions. A detailed plan of operations would be developed and become part of the site wide plan of operation. Additionally, before stockpiling materials on existing solid waste disposal areas, approval would be requested from Public Health.

Topic by Chapter	Commenter	King County Solid Waste Division Response
4. Proximity of landfill to landfill gas processing facility	• Bill Lasby, Supervisor Public Health - Seattle & King County (Public Health)	No significant adverse impacts are anticipated due to the proximity of the waste disposal area to the Bio Energy (Washington), LLC (BEW) landfill gas-to-energy facility or the gas delivery pipeline that supplies landfill gas to it. KCSWD would develop a detailed plan for Public Health approval to ensure that the pipe that supplies gas to the BEW facility would not be affected by implementation of any of the alternatives.
Chapter 4 – Air and Odor		
1. Odor related to landfill operations	• Douglas Babcock • Richard & Dianne Beaudry • Mimi Dickens • Sean Kronberg • Greg Evans • Linda Holt • Cathy Kail • John Olson • David Sheridan • Lars Soerensen • Anonymous – resident from Mirrormont area • Denise & David Vogel • Garry Wilson • Leslie Morgan *et al.**	KCSWD meets or exceeds the regulatory requirements for air pollution and odor emissions from the landfill. KCSWD uses several best management practices to reduce the potential for odor related to landfilling, including: collecting, transmitting, and combusting landfill gas in compliance with existing regulations; using two lagoons in series to aerate leachate collected from the landfill before sending it through the sanitary sewer system for treatment; minimizing the size of the active landfill area; and placing a cover material over the active area at the end of every day. In order to be responsive to neighbor concerns, KCSWD developed a Complaint Response Plan for the Cedar Hills Regional Landfill (CHRLF), which has been in place since 2000, and maintains a 24-hour phone line (206-296-4490) for neighbors to report a complaint or concern. Odor is monitored daily across the surface area and around the perimeter of the landfill, as well as weekly in adjacent neighborhoods. In addition, odors are investigated by KCSWD staff any time a complaint is received. In response to odor complaints, KCSWD staff visit the complainant's location to assess the situation. Odors may then be traced to the source, corrective measures taken as necessary, and the complainant informed of the measures taken. A copy of KCSWD's Complaint Response Plan is included as an appendix to the Final EIS. The Puget Sound Clean Air Agency (PSCAA) also maintains an Air Quality Complaint Line (206-343-8800, ext. 6) for residents to report odor complaints – whether the odors are from King County's landfill, the nearby privately owned and operated Cedar Grove Composting facility, or some other source. Air and odor modeling results from tests conducted as part of the Draft EIS process indicate that none of the alternatives would have any potential significant odor impacts. The EIS considered odors as a result of CHRLF operations and concluded that they are transient in nature and do not cause cumulative impacts.

Topic by Chapter	Commenter	King County Solid Waste Division Response
2. Reporting of odor complaints	• Mimi Dickens • Sean Kronberg	Neighbors within 3.2 miles of the CHRLF have been made aware of the formal Complaint Response Plan. From 2004 to 2009 the CHRLF received 80 complaints related to odor (Grant 2010). In each case, a trained odor monitor from the CHRLF responded to the complaint and determined that the odor was not characteristic of landfilling operations. PSCAA also collects odor complaint information by suspected source (Williams 2009). Between 2004 and 2009, PSCAA received 2,348 odor complaints from residents in the area (PSCAA 2009). Of those complaints, PSCAA identified the Cedar Grove Composting facility as the suspected source in 2,320 cases (98.8 percent) and CHRLF as the suspected source in 28 cases (1.2 percent). For 7 of the 28 complaints, PSCAA directed KCSWD to take corrective action; for the remaining 21 complaints, no corrective action was required.
3. Odor and gas related to excavation of solid waste	• Dennis Griffin • Sean Kronberg • Leslie Morgan *et al.**	Prior to any waste excavation, KCSWD would prepare a plan for approval by Public Health, which would include specific terms and conditions for soil and solid waste excavation and mitigation measures. The plan would include methods for controlling potentially explosive and other hazardous gases and odors. KCSWD has done similar solid waste excavation work in the South Solid Waste Area and at transfer stations, under plans approved by Public Health, which included air monitoring, and had no impacts. Further details are included in Chapter 4 of the Final EIS.
4. Gas processing and flaring	• Dennis Griffin	BEW is responsible for odor sources within its boundary. BEW must have an approved Plan of Operations and meet PSCAA air permit requirements. KCSWD coordinates with BEW regularly regarding BEW's compliance with regulatory requirements applicable to BEW's site operations. A detailed discussion of the BEW landfill gas-to-energy facility is beyond the scope of this EIS. For more information about the BEW facility, inquiries can be made directly to BEW at 425-392-3918, or www.bioenergy-wa.com.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 5 – Surface Water		
1. Siltation ponds	• Dennis Griffin	KCSWD tests downstream of the siltation ponds and maintains the capacity to shut off outflow from the ponds if necessary to prevent any contaminated discharges.
2. Surface water runoff	• Sean Kronberg • Mimi Dickens • Bill Lasby, Supervisor, Public Health - Seattle & King County (Public Health) • Jim Westveer	Control of clean and contaminated surface water runoff would remain consistent with current practices. Surface water that has come into contact with solid waste or other potential contamination sources is conveyed to the wastewater facility for treatment. Because surface water would be handled in the same manner for all alternatives, no difference in water quality impacts is anticipated. Because the landfill area is not expanded in any alternatives, and all areas of the landfill property are included in planning and design of both onsite and offsite drainage systems, there would be no significant impact to surface water quantity. Onsite drainage options, onsite drainage basins, and impacts from surface water runoff are clarified in Chapter 5 of the Final EIS. Surface water ponding in Area 5 was anticipated and was caused by differential settlement of the area due to subsurface solid waste decomposition. This issue is addressed in Chapter 5 of the Final EIS. Any potentially contaminated surface water runoff from relocated facilities would be directed to the leachate/contaminated stormwater collection system. However, KCSWD's recommended preferred alternative, Alternative 2, does not include relocation of any facilities.
3. Surface water quality	• Sean Kronberg • Dennis Griffin	Details of when benchmark values were exceeded are clarified in Chapter 5 of the Final EIS. BEW is responsible for maintaining the quality of stormwater runoff from its operations.
4. Contaminated stormwater lagoon	• Sean Kronberg	The capacity of the contaminated stormwater lagoon was increased in 2009. This is clarified in the Final EIS.

Topic by Chapter	Commenter	King County Solid Waste Division Response
5. Permitting	• Meredith Redmon, Water Quality Planner, King County Wastewater Treatment Division	KCSWD would send the project construction drawings to the King County Wastewater Treatment Division's Asset Management section for review during design development. Estimates of additional leachate discharge would be included in KCSWD's permit modification application. KCSWD's existing Industrial Wastewater Discharge Permit would be modified along with the implementation of any of the alternatives.
Chapter 6 - Groundwater		
1. Monitoring, sampling, and liner clarification	• Mimi Dickens • Sean Kronberg • Jim Westveer	KCSWD's environmental monitoring program includes monthly monitoring of surface water, and quarterly monitoring of groundwater. At this time, no changes are planned to the monitoring frequency although the program is regularly evaluated. Analysis of the groundwater monitoring data upgradient and downgradient of the landfill site indicates that the source of contamination in the regional aquifer is the privately owned Queen City Farms Superfund Site, which is upgradient of the CHRLF. Since the quality of the groundwater is improved downgradient of the CHRLF site, mitigation measures are not required. The source of contamination has been present for the entire history of the groundwater monitoring at CHRLF and current results are consistent with historical results. Information on contamination of the localized perched groundwater zones and clarification about the areas that have an impermeable landfill liner is included in Chapter 6 of the Final EIS.
Chapter 7 – Upland Vegetation, Wetlands, and Wildlife		
1. Potential relocation of facilities to SE corner buffer	• Mimi Dickens • Sean Kronberg	There would be no indirect or cumulative impacts to upland vegetation, wetlands, or wildlife under any of the alternatives due to the relocation of facilities within the SE corner of the buffer. However, there would be direct impacts to upland vegetation and wildlife (not wetlands) if facilities were relocated in the buffer. This is discussed in Chapter 7 in the Final EIS. The removal of up to 21 acres of upland vegetation adjacent to the already developed site is a small percentage of the 920-acre CHRLF site. KCSWD would use low impact development techniques to enhance wildlife habitat in the area if facilities were to be relocated to the buffer. However, KCSWD has recommended Alternative 2 for implementation, so no relocation of facilities or removal of upland vegetation would be required.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 8 – Noise & Vibration		
1. Noise related to operation of CHRLF	• Douglas Babcock • Steve Cole • Mike Krzycki • Leslie Morgan *et al.** • Greg Evans • Denise & David Vogel • Dennis Griffin	Backup beepers are commonly used during landfill operating hours and sporadically during maintenance hours. CHRLF operating hours and maintenance hours are included in Chapter 1 of the Final EIS. Contractors working at CHRLF are contractually required to comply with the King County noise code requirements. In order to be responsive to neighbor concerns, KCSWD developed a Complaint Response Plan and maintains a 24-hour phone line (206-296-4490) for neighbors to report a complaint or concern. In response to noise complaints, a KCSWD staff person visits the complainant's location to assess the situation. Noises may then be traced to the source, corrective measures are taken as necessary, and the complainant informed of the measures taken. A copy of KCSWD's Complaint Response Plan is included as an appendix to the Final EIS. Bird control measures used at CHRLF are described in Chapter 7 of the Final EIS. KCSWD is in compliance with applicable regulations pertaining to the noise generated by bird control measures. The hours when bird control measures are used were changed in response to neighbor concerns. The description of the area around CHRLF is clarified in Chapter 8 of the Final EIS.
2. Noise measurements taken as part of the EIS	• Mike Krzycki	As part of the EIS, noise impacts were evaluated at the CHRLF property lines and noise-sensitive residential locations within about 1,000 to 3,000 feet of the landfill. To be conservative, the model used to predict the sound levels expected from the noise-producing equipment operating at the facility under several scenarios did not include the existing foliage and vegetation surrounding the landfill site. The methodology used to evaluate noise impacts from the development alternatives is described in Chapter 8 in the Final EIS.
3. Location of landfill access road	• Dennis Griffin	King County has not considered leasing property from neighboring businesses in order to relocate access roads at this time.

Topic by Chapter	Commenter	King County Solid Waste Division Response
4. BEW landfill gas-to-energy facility	• Mimi Dickens • Sean Kronberg • Mike Krzycki • Leslie Morgan *et al.**	BEW did a separate environmental review process for their landfill gas-to-energy facility per the State Environmental Policy Act (SEPA). For more information about the BEW facility, inquiries can be made directly to BEW at 425-392-3918, or www.bioenergy-wa.com. Based on comments received on the Draft EIS related to potential noise from the BEW facility associated with the removal of the Southwest Main Hill and East Main Hill refuse areas, KCSWD has withdrawn Alternative 4 from further consideration in the Final EIS.
5. Potential noise in the SE Pit Refuse Area	• Leslie Morgan *et al.** • Sean Kronberg • Mimi Dickens • Mike Krzycki	The worst-case noise scenario predicted by the model used to evaluate noise impacts from the development alternatives would occur during construction on the ridgeline formed by the Southwest Main Hill and East Main Hill refuse areas (proposed in Alternative 4, which was withdrawn, and Alternative 5). Noise levels for operations under all other alternatives, including excavation of the SE Pit Refuse Area, fall within the permissible noise levels. Excavation of the SE Pit Refuse Area is an optional element of Alternatives 1, 2, and 3. For any alternative selected that involves activity on the ridgeline or excavation of the SE Pit Refuse Area, necessary noise attenuation measures would be planned and submitted for approval by Public Health before any construction activities occurred.
6. Cumulative noise	• Leslie Morgan *et al.**	Noise from both landfill construction and operations were considered as part of this EIS. KCSWD's noise modeling performed for this EIS was for the CHRLF only. BEW and Cedar Grove Composting are responsible for the noise they generate.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 9 – Human Health		
1. Waste monitoring	• Dennis Griffin	KCSWD has a staff of Waste Screeners assigned to monitor and screen waste at transfer stations and the landfill.
2. Landfill gas management	• Sean Kronberg • David Sheridan	Landfill gas contains trace quantities of toxic air compounds (TACs), which at high enough concentrations can pose a risk to human health. Some of the compounds found in landfill gas can also contribute to odor. A TAC evaluation for CHRLF was conducted for the worst-case of the five action alternatives. The results of the analysis indicate that landfill operations would be below all state and local exceedance levels for all alternatives. There are three potential pathways by which people can be exposed to TACs and odors associated with landfill gas. The first is emissions of landfill gas from the gas management system. This pathway is not a source of significant landfill gas emissions at the CHRLF because of the destructive efficiency (>98%) of the flares and the operation of the new gas-to-energy facility. The second potential pathway is emissions off-site as a result of subsurface gas migration. This pathway also is not a source of significant landfill gas emissions at CHRLF because a gas migration control system has been installed, and perimeter gas monitoring probes are sampled routinely, which confirm that off-site gas migration is not occurring. Finally, emissions through the landfill surface that escape the gas management system, called fugitive emissions, can be a pathway for odors or trace amounts of toxic compounds. However, CHRLF regularly monitors surface emissions and the results show that surface emissions from the landfill are in compliance with Puget Sound Clean Air Agency regulations. KCSWD has a goal of zero odor and zero complaints from its landfill operations and all measures in place to manage landfill gas would be continued and/or expanded during the implementation of any alternatives for the CHRLF.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 10 - Land Use		
1. Buffer use	• Sean Kronberg • Dennis Griffin • Mimi Dickens • Leslie Morgan *et al.**	The 1960 Special Permit allowed for a sanitary landfill for King County. Since then, other actions (permits, settlement agreements, interagency agreements, etc.) have allowed other uses in the buffer. In 1966, construction of the Cedar Hills Alcohol Treatment Center (CHATC) was approved by the Board of King County Commissioners. In 1975, the CHATC was approved for expansion to include the addition of greenhouses and recreational field facilities by the Zoning Adjustor of the Department of Community and Environmental Development, Division of Land Use Management. The January 1985 settlement agreement between Ernest Hanni, *et al.* and King County, *et al.,* allowed the 1,000 foot buffer to be used for operating facilities for the landfill such as pump stations, and allowed King County to enter the buffer zone to construct, repair or maintain any new or existing facility or condition in order to mitigate off-site impacts of activities occurring at the landfill. The leachate ponds were also allowed under the 1985 settlement agreement between Ernest Hanni, *et al.* and King County, *et al*. In 1992, the KCSWD obtained an Unclassified Use Permit to construct the water storage tank at the CHRLF site for fire suppression. KCSWD pays rent to King County in order to operate the landfill on the property. King County Facilities and Maintenance Division, not KCSWD, acts as landlord for the entire property on behalf of property owner King County and as such, administers all non landfill-related activities in the buffer. KCSWD is responsible for the maintenance of the buffer, as it pertains to landfill-related activities, but does not have full control of the buffer area. King County as the property owner has authorized other uses in the buffer, and King County Facility Management Division is responsible for managing those other uses. Facility relocation in the buffer would require additional permitting from the appropriate regulatory agencies. However, KCSWD has recommended Alternative 2, which proposes no relocation of facilities in the buffer, as the preferred alternative in the Final EIS. KCSWD must comply with the permits, agreements, and regulatory requirements related to land use of the site. The proposed alternatives would not change the currently permitted on-site land use.

Topic by Chapter	Commenter	King County Solid Waste Division Response
2. Passage Point	• Mimi Dickens • Sean Kronberg • Dennis Griffin	Passage Point is an independent project granted by King County and managed by the King County Department of Community and Human Services, not KCSWD. For more information on Passage Point, please contact the King County Department of Community and Human Services at 206-263-9100 or via email at DCHS@kingcounty.gov. The focus of this EIS is the evaluation of environmental impacts of development alternatives at CHRLF that would extend the life of the landfill; operation of the Passage Point facility is outside the purview of this EIS. Updated information on Passage Point is included in Chapters 2 and 10 of the Final EIS. The settlement agreement regarding Passage Point had not been finalized at the time the Draft EIS was prepared. Since then, KCSWD has considered the potential health and environmental impacts of the landfill and determined that there would be no health and environmental impacts to Passage Point residents.
3. Buffer restoration	• Sean Kronberg • Dennis Griffin • Leslie Morgan *et al.**	All of the alternatives include the provision to excavate soil and solid waste from the unlined South Solid Waste Area, place that waste in a lined cell, and restore the area within the buffer. Restoration would involve regrading with clean soil and planting with native vegetation as appropriate. Under Alternatives 1, 2, and 3, excavation of the SE Pit Refuse Area is an optional element. Under Alternatives 1 and 2, restoration could occur as described above. Under Alternative 3, the area could either be restored or could be considered for relocation of some maintenance and administration facilities. The SE Pit Refuse Area would not be excavated under Alternative 5. KCSWD would confer with the appropriate regulatory agencies as needed, prior to the removal of any waste. Approval from Public Health would be required on a mitigation plan that addresses any impacts from excavating waste in the buffer. KCSWD considers removal of solid waste from the buffer to be part of buffer restoration. No solid waste disposal, i.e., sanitary operations, would occur in the buffer under any of the alternatives. There is no court order requiring KCSWD to restore the buffer to its natural state. As agreed in the Brighton, *et al.* settlement agreement, King County retained the services of a qualified landscape architect to evaluate the condition of trees in the western buffer; as a result, additional trees were planted.

Topic by Chapter	Commenter	King County Solid Waste Division Response
4. Past landfilling in the buffer	• Dennis Griffin • Sean Kronberg • Leslie Morgan *et al.**	Other than aerial photographs taken of the CHRLF in the 1970s and 1980s, KCSWD has no records regarding landfilling that occurred in the buffer. To re-establish the buffer in the NE corner of the landfill where landfilling occurred in the early 1970s, KCSWD purchased a parcel in the NE corner of the landfill. While this parcel is not included in the 1960 Special Permit, it has functioned as a buffer since 1983. In those areas where KCSWD would excavate solid waste from the buffer, KCSWD would restore the buffer as described above.
Chapter 11 – Scenic Resources – Aesthetics, Light, and Glare		
1. Selection of locations to assess visual impacts of landfill	• Dennis Griffin	Visual impacts of the landfill from the neighborhood were analyzed from eight randomly selected locations; SE 159th Street was not one of the randomly chosen locations.
2. BEW landfill gas-to-energy facility	• Mike Krzycki • Lars Soerensen • Leslie Morgan *et al.**	The BEW landfill gas-to-energy facility operates independently on land leased from King County inside the CHRLF. The BEW facility is currently in the commissioning stage and requires occasional flaring of gas during the starting and stopping of the conversion process. As the BEW facility operates more consistently, the flare would not be operating most days of the year and the effects of the glare would be minimized. BEW is expecting their facility to be fully operational in 2010. For more information about the BEW facility, inquiries can be made directly to BEW at 425-392-3918, or www.bioenergy-wa.com.
3. Landfill height	• Leslie Morgan *et al.**	KCSWD does not have any plans to raise the landfill height beyond a maximum elevation of 780 to 800 feet above mean sea level. Any soil stockpile would also be maintained at this height. Increasing the height of existing areas of the landfill would not create exposure to garbage or associated environmental impacts.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Chapter 13: Transportation		
1. Traffic	• Sean Kronberg • David Sheridan	The traffic study conducted for the EIS analyzed both existing traffic volumes and expected future traffic volumes for each alternative and compared the environmental impacts and crash data. It was concluded that none of the alternatives would result in a significant impact on the analyzed transportation network as compared to the No Action Alternative. The existing traffic volume reflects transportation impacts for the No Action Alternative. Most of the vehicles on the Cedar Grove Road are passenger cars and other smaller vehicles (about 80 percent). As presented in the Draft EIS, KCSWD haul trucks make up about 6 to 7 percent of the total number of vehicles on Cedar Grove Road. The remaining vehicle traffic on Cedar Grove Road is generated by Cedar Grove Composting, Stoneway Rock and Recycle, Quality Aggregates, and Pacific Topsoil, and other trucks traveling between Issaquah-Hobart Road and SR 169.
Chapter 15: Greenhouse Gases		
1. U.S. Environmental Protection Agency (EPA) Greenhouse Gas compliance	• Claude Williams, Air Pollution Engineer II, Puget Sound Clean Air Agency (PSCAA)	KCSWD has been monitoring greenhouse gas (GHG) emissions as a part of the PSCAA Title V permit as well as under the new EPA mandatory rule requirements, and in compliance with the regulatory limits. All of the alternatives require continuation of the existing monitoring system. In addition, KCSWD will install additional gas flow meters at its flare station to obtain continuous flow readings, which will meet U.S. EPA's recent mandatory GHG emissions requirements. KCSWD will continue to work closely with PSCAA to implement the new state GHG reporting regulations.
Chapter 16: Comparative Cost Analysis		
1. Cost analysis	• Sean Kronberg • James Morris	Cost is not a required element of the EIS and has been removed from the Final EIS. A separate cost analysis is being prepared.
2. Environmental cost of landfilling	• Sean Kronberg	KCSWD interprets the environmental cost of landfilling as the cost of mitigation for the adverse impacts of the landfill. The EIS concludes that no significant adverse environmental impact would occur for any of the alternatives.

Topic by Chapter	Commenter	King County Solid Waste Division Response
Miscellaneous comments not related to a specific chapter		
1. Landfill location	• Richard & Dianne Beaudry • Hans Chambers • Greg Evans • Leslie Morgan *et al*.* • Glenn Van Winkle • Garry Wilson • Denise & David Vogel • David Sheridan • James Morris • Jim Westveer	The Special Permit for the CHRLF was issued in 1960. The permit notes that the "property abuts the Queen City Hog Farm and the Seattle Disposal Company's refuse disposal site on the South", and that "all other surrounding property is undeveloped." Since then, development has grown up around the CHRLF site. It is King County's policy that, "The county should not seek to site a replacement landfill for the Cedar Hills Regional Landfill in King County." Extending the useful life of the CHRLF would keep disposal costs lower for all King County ratepayers. KCSWD has recommended Alternative 2 as the preferred alternative in the Final EIS, which proposes no active use of the protective buffer around the landfill, does not pose any significant adverse environmental impacts, and would extend the useful life of the landfill by an additional 5 to 6 years beyond the current estimated closure date of 2018.

Topic by Chapter	Commenter	King County Solid Waste Division Response
2. Landfill closure date	• Douglas Babcock • Linda Holt • Alexandre & Marina Mazepa • John Olson • Hans Chambers • Leslie Morgan *et al.** • Diane Sheridan • Garry Wilson • David Sheridan • Richard & Dianne Beaudry • Mimi Dickens • Greg Evans • Denise & David Vogel • James Morris • Kay Palmer • Anonymous – resident from Mirrormont area	The calculated capacity of the landfill is defined as the volume of space available based on height, footprint, and slopes of the refuse cells. The capacity, or life, of the landfill is based on the amount of incoming solid waste and the density and consolidation of materials in the landfill over time. These factors make it possible to only provide an estimated date of when CHRLF might reach capacity, so the estimated closure date is modified as these factors vary. KCSWD has been monitoring landfill capacity in the region and landfill technologies so that prior to CHRLF reaching capacity, a new disposal option(s) will be in place.
3. Property values	• Douglas Babcock • Leslie Morgan *et al.** • Garry Wilson • James Morris	The purpose of the EIS is to evaluate environmental impacts. Property values were not an element discussed in the Draft EIS and will not be addressed as part of the Final EIS.

Topic by Chapter	Commenter	King County Solid Waste Division Response
4. BEW landfill gas-to-energy facility	• Cathy Kail • Leslie Morgan *et al.**	In 2008, KCSWD contracted with renewable energy company INGENCO, doing business as Bio Energy (Washington), LLC (BEW) to generate usable energy from methane gas produced by decomposing garbage at the CHRLF. BEW designed and built a landfill gas processing facility on about 2 acres of land leased from King County. KCSWD will maintain its existing flare station in good operating condition to handle gas flaring in the event the BEW facility shuts down.
5. Public process	• Dennis Griffin	KCSWD followed the State Environmental Policy Act (SEPA) rules for the public hearing on the Draft EIS. KCSWD sponsors an ongoing forum to actively discuss community/neighbor concerns through the Citizen Review Committee that meets twice a year. KCSWD encourages neighbor involvement in that ongoing forum in order to hear and respond to neighbor concerns.

*"Leslie Morgan *et al.*" includes the following residents who signed the letter sent by Leslie Morgan: Mark and Rachel Monte, Michael and Heather Luedke, Richard Nieman and Frecia Kelly, Kim and Rick Brighton, David and Cherri Linnenkamp, Alan and Robin Richards, and Denice Vance.

From: Varo, Chris
Sent: Monday, November 02, 2009 11:28 AM
To: Rahman, Mizanur
Subject: FW: WEB SITE COMMENT: King County Solid Waste Division

This one is for you.

Chris

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Sunday, November 01, 2009 4:58 PM
To: SWD, WebSite
Cc: Varo, Chris
Subject: WEB SITE COMMENT: King County Solid Waste Division

Thank you for submitting the following comments via the Solid Waste Division
Web site:

PERSONNAME:
ADDRESS: Issaquah, WA 98027
EMAIL:
COMMENTTYPE: Problem
PROGRAM: King County Solid Waste Division
COMMENTS: The Cedar Hills Regional Landfill Draft EIS does not adequately mitigate the odor problem. The odor emissions from the combined sources of Cedar Hills Landfill and Cedar Grove Composting have been affecting us in the Mirrormont area for years. We cannot continue to be the county's dumping ground with inadequately mitigated air pollution and lack of odor control. The landfill should be retired as scheduled. I support the No Action alternative.
IMG_VERIFY: FYD

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: 11/1/2009 4:58:17 PM

From: Varo, Chris
Sent: Friday, October 23, 2009 8:21 AM
To: Rahman, Mizanur
Cc: SWD, WebSite
Subject: FW: WEB SITE COMMENT: King County Solid Waste Division- Landfill Site Development

This one is for you.

Chris

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Thursday, October 22, 2009 5:44 PM
To: Douglas Babcock
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: King County Solid Waste Division

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Douglas Babcock
ADDRESS: 20211 SE 157th St
EMAIL: dsbab99@comcast.net
COMMENTTYPE: Problem
PROGRAM: King County Solid Waste Division
COMMENTS: I do not want expansion of the Cedar Hills facility. We in Maple Hills have been promised again and again that the landfill would not expand, that in fact it would be closed down. I do not like the smell and the noise of machinery with their back up alarms going on all night. You made (many) promises to close it down. So DO IT! The quality of our neighborhood as well as property values are being severely impacted by the continuation of operations there.
IMG_VERIFY: black

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: 10/22/2009 5:43:31 PM

From: Litras, Tami on behalf of SW Comp Plan Comments
Sent: Friday, November 06, 2009 3:54 PM
To: Rahman, Mizanur
Cc: Varo, Chris; SWD, WebSite
Subject: FW: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Mizan,
This comment relates to the CHL SDP Draft EIS, not the Draft 2009 Comprehensive Solid Waste Management Plan.

Thanks,
Tami

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Friday, November 06, 2009 1:51 PM
To: Richard P. Beaudry
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Richard P. Beaudry
ADDRESS: Maple Valley, Washington 98038
EMAIL: rpbeaudry@comcast.net
COMMENTTYPE: Problem
PROGRAM: Draft 2009 Comprehensive Solid Waste Management Plan
COMMENTS: We live in Cedar Grove Estates and have been experiencing ever increasing foul odors over the last year. When we bought our property in this community we were told that the landfill would be retired in a few years. This summer we learned that it is now the repository for additional solid waste from everywhere in KC except Seattle. We pay high property taxes and submit that the landfill has outlived its place in the community. We got building permits and expanded our community in contemplation of the landfill being closed. Now KC wants to expand and prolong the landfill"""""""""'s existence. This is a major conflicting use that we were told would be soon gone. Now we are told that this indeed is not the case. We are disappointed and angered that this landfill will be further enlarged. It is time to move it out into the hinterlands where it belongs. The Cedar Grove area is no longer the place for such a vile operation. Yet we were told "build here" the landfill wouldl close in a few years. We were duped, yet KC continues to enjoy the revenue from sustantial property taxes. The two uses are incompatable. We protest this new plan most vehemently. We intend to bring this up with the new Executive, Dow Constantine, who is a lawyer and will surely listen to our concerns . Richard and Dianne Beaudry
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: 11/6/2009 1:50:55 PM

From: Varo, Chris on behalf of SWD, WebSite
Sent: Thursday, November 05, 2009 3:51 PM
To: Rahman, Mizanur
Subject: FW: WEB SITE COMMENT: King County Solid Waste Division

Another comment.

Chris

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Thursday, November 05, 2009 6:56 AM
To: Hans Chambers
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: King County Solid Waste Division

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Hans Chambers
ADDRESS: Issaqua, Wa, 98027
EMAIL: hanschambers@msn.com
COMMENTTYPE: Request
PROGRAM: King County Solid Waste Division
COMMENTS: The proposed expansion of Cedar Hills landfill is a bad idea. All of the proposed plans will increase the amount of garbage in the ground. The landfill and composting companies have proven themselves to be bad neighbors. Let's look ahead to the future when a landfill in an area like Cedar Hills would not even be a consideration. Let's go ahead and pay the extra money to have garbage disposed of in an area that is set aside just for a landfill and well away from houses and water. Allowing the expansion of the landfill is not forward looking. It's a stop gap measure designed to postpone the real fix which is shipping the garbage out to Arlington.
Hans Chambers
IMG_VERIFY: Green

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: 11/5/2009 6:55:59 AM

From: Litras, Tami on behalf of SW Comp Plan Comments
Sent: Friday, November 06, 2009 3:52 PM
To: Rahman, Mizanur
Cc: Varo, Chris; SWD, WebSite
Subject: FW: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Mizan,

This comment relates to the CHL SDP Draft EIS, not the Draft 2009 Comprehensive Solid Waste Management Plan.

Thanks,
Tami

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Thursday, November 05, 2009 4:32 PM
To: Steve Cole
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Steve Cole
ADDRESS: Issaquah, WA 98027
EMAIL: stevecole7777@yahoo.com
COMMENTTYPE: Problem
PROGRAM: Draft 2009 Comprehensive Solid Waste Management Plan
COMMENTS: "Draft EIS, Chapter 8: Noise and Vibration" makes absolutely no mention of vehicle backup alarms, which can be distinctly heard at my residence at night over two miles away as the crow flies. These alarms are so loud and prevalent that this oversight begs challenges to the completeness of the rest of the EIS. I would like to see a mitigation plan for this nuisance noise that especially irritates us on summer nights when the bedroom windows are open.
IMG_VERIFY: BTY

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: 11/5/2009 4:32:13 PM

From: Mimi [mi_2@earthlink.net]
Sent: Friday, November 06, 2009 3:16 PM
To: Rahman, Mizanur
Subject: Draft EIS Public Comment

Mimi Dickens
22808 SE 154th St
Issaquah, WA 98027
mi_2earthlink.net
425-761-9758

Comments regarding the Draft EIS Cedar Hills Regional Development Plan:

When my husband decided to purchase our property twenty years ago he was assured that the Landfill would be shutting down by the early 90's. Newspaper archives attest to the fact that landfill operations were to be wound down and refuse sent elsewhere. He would not have purchased our property, which is adjacent to the 1,000 foot buffer, if he had known that the landfill would still be in operation today.

Of stark note in the Draft EIS is the neglect of the "no action alternative" in many areas of the report. It should be fully presented as a genuine alternative.

The special use permit regarding the 1,000 foot buffer requires that it be left in its "natural state" with no sanitary operations in this area. This appears in conflict with some of the alternatives. The whole issue of the 1,000 foot buffer permit is a glaring omission in the report.

The natural gas pipeline is not fully functional as of this writing. The potential noise and vibration impacts if the hill area is removed could be great. This needs to be addressed. Mitigations?

What is the formal complaint response plan for odors? Currently I have been reporting to the Puget Sound Clean Air Agency. What is the commitment that King County has made and what are the specific actions and time frames? The reporting of complaints does not appear complete. Earlier this year we called the local fire department as the smell was so vile that we seriously considered taking our children to a local hotel for the night. The pungent odor was sickening. Full impact of odors needs further addressing.

Surface water"ponding" in Area 5 is already an issue with settlement. Impact of surface waters/run off to local streams and seasonal streams would occur. What drainage options are being considered? This summer I was diagnosed with e-coli-most cases are caused by water- borne contaminants. Will there be changes to the monitoring frequency of the well sites and ground waters with the various proposals?

The environmental impact to area wildlife should be more fully addressed for each of the plans. For people who live in the area, we know that there will be impacts to all but the "no action" alternative to the wildlife surrounding us.

As a member of the Community Advisory Group for Passage Point I would like to see the Land Use section reflect the situation accurately.

Sincerely. Mimi Dickens

From: SWD, WebSite
Sent: Monday, October 12, 2009 11:56 AM
To: Greg Evans
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Greg Evans
ADDRESS: Renton, WA 98059
EMAIL: gevans@usa.aecon.com
COMMENTTYPE: Problem
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: This is the second comment I have submitted regarding the Cedar Hill Landfill site development plans. I do not understand why the landfill is seeking another extension for utilization at this site. The landfill had a previous deadline for closure and is simply asking to extend this yet again. The landfill is a problem in my neighborhood for both odor and noise. I suggest closiing the facility and moving to another location where it will not impact neighborhoods.
IMG_VERIFY: CUA

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: 10/12/2009 11:56:13 AM

KCSWD Draft EIS Review

RECEIVED
King County DNRP
NOV 05 2009
Solid Waste Division
Engineering Services Section

Questions and Concerns
11/4/2009

Excavation of the SSWA and SE pit areas

1. Gas and odor will be a problem and containment procedures were not indicated. Please describe how these will be contained?

2. How will the possibilities of methane explosions be prevented during excavation of the pits?

3. How will the CO_2 and methane be disposed of?

4. What other hazardous gasses do you expect to encounter and how will they be disposed of?

5. How will the excavated material be tested for hazardous materials? What are the methods for disposing of the hazardous materials encountered?

6. What contaminates will you be testing for in the soil at the bottom of these pits?

7. How deep will your soil tests be conducted?

Surface Water Mitigation

8. Are siltation ponds regularly tested for contamination?

9. If they become contaminated what are the mitigation procedures and how will contaminated water be prevented from entering Queen City Lake?

Gas Processing and Flaring

10. Does SWD's overall responsibility for air and water quality for the site extend to the BEC gas processing facility? If not please explain why this should not be the case.

11. How does the gas plant dispose of CO_2 and hazardous gasses?

12. Under what conditions will flaring be done?

Relocation of Facilities

13. What authority allows SWD to consider relocating operational facilities into a buffer that is supposed to be left in its natural state?

14. Will King County consider leasing land from Queen City Farms for the relocation of their facilities and also relocating the access road through either Cedar Grove Composting or Stoneway in order to eliminate truck noise for the neighbors whose properties are adjacent to the current access road?

15. Will King County consider making their contractors provide equipment that is at least as quiet as the County transfer trucks?

Buffer

16. There seems to be some confusion as to who owns the buffer surrounding the landfill. SWD leases the land from the County. Does this lease include the buffer? If not why since the original permit defined the buffer as part of the landfill.

17. SWD claims that the buffer belongs to King County yet when a recent SWAT exercise was conducted within the buffer it caused SWD to go into emergency mode because they were unaware or the exercise until it was in progress. Since the buffer is a requirement of the landfill why doesn't SWD have total control of it?

18. The draft EIS and a paper to SWANA in 2005 both indicate that a 1,000 ft buffer surrounds the property in its natural ("pristine") state. This is not the case along either the East or South buffers. The County has, for several years, been under a court order to restore the buffer to its natural state but by its own admission has not done so. What is the timeline for the County's restoration of the entire buffer to its natural state?

19. Under what authority was the buffer modified to allow for the installation of the leachate ponds and the water tank?

20. Under what authority was the County allowed to use the buffer for landfill operations?

21. SWD indicates that King County owns land beyond the NE corner of the landfill, which serves as an additional buffer. By what authority can this be considered a buffer when it is not defined as such in the landfill's operational permit?

22. Is the County's planned used of the former CHAT facility an essential facility? If so why is the neighborhood being burdened with additional essential facilities? If not what authority allows a non-essential facility to be operated within an essential facility such as a landfill?

23. SWD's illegal use of approximately 38 acres of the buffer for landfill operations extended the life of the landfill by about 3.3 years. Why should SWD not consider excavating all of these areas and relocating the garbage within the operational boundaries and then fully restoring the buffer? Why shouldn't this be done prior to considering any of the five alternatives since it would have a significant impact on the future life of the landfill?

Scenic Resources

24. Chapter 11 did not consider the visual impact at the end of SE 159th Street where for 32 years neighbors have had a direct view of landfill operations. This also resulted in higher noise levels than within the landfill area. Why was this was not considered in the draft EIS and what will be done to correct it?

General

25. The draft EIS indicates that the incoming waste stream is actively monitored for material that should not be buried. I have not observed any monitoring either by garbage pickup services or at the transfer stations. How is the waste stream monitored?

26. Paragraph 10.2.1 states that no construction activities will take place in the buffer. Doesn't excavation of the previously filled areas within the buffer involve construction activities?

27. There are several issues that have not been covered in the draft EIS. A public hearing held on October 22, 2009 was conducted in a way that it suppressed active discussion of these and any other concerns of neighbors. King County needs to delay the issuance of the final EIS and hold one or more public hearings where the neighbors can air out concerns in an active discussion. Please indicate if the County will consider this and if not why?

Comments submitted by:
Dennis Griffin
22917 SE 159th Street
Issaquah, WA 98027

From: SWD, WebSite
Sent: Friday, October 09, 2009 2:04 PM
To: Linda Holt
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Linda Holt
ADDRESS: Renton, WA 98059
EMAIL: lindaholt964@msn.com
COMMENTTYPE: Problem
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: The odor from the landfill at my home is sometimes so bad that it''s difficult to go outside. Anytime the wind comes from that direction or absolute dead calm, the smell is intolerable. Close the landfill sooner then later.

Thanks, Linda
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: 10/9/2009 2:04:27 PM

From: SWD, WebSite
Sent: Wednesday, October 07, 2009 4:03 PM
To: SWD, WebSite
Cc: Rahman, Mizanur
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Cathy Kail
ADDRESS: Issaquah, WA, 98027
EMAIL:
COMMENTTYPE: Problem
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: Haven''t we been hearing for years about development of an environmentally-friendly, energy-producing process using the methane gas at Cedar Hills Regional Landfill? If once again the inevitable "always-more-profits" viewpoint has squashed that idea, then at least do something about the stench that pervades the air most months of the year and wafts across numerous residential neighborhoods around the vicinity of CHRL, including High Valley neighborhood on Squak Mountain. Thank you.
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: 10/7/2009 4:03:12 PM

Sean Kronberg
15607 230th AVE SE
Issaquah, WA 98027
sean.k.kronberg@gmail.com
206.619-1794

November 5, 2009

Subject: Comments related to the Cedar Hills Regional Landfill, 2009 Site Development Plan Draft Environmental Impact Statement

To Whom It May Concern:

As I reviewed the draft EIS, my goals have been to identify any inaccuracies in the EIS, identify any areas of potential environmental impact that have not been identified, find any adverse environmental impacts that have not been adequately addressed, suggest possible mitigation measures that could or should be added to the proposal and propose reasonable alternatives to the proposal. Each of my comments below can fit into one of those goals, and I hope they are considered carefully. If any comment does not make sense or you have questions, please do not hesitate to contact me directly, I would be happy to discuss any of the items.

Generally, I would like to comment that many of the chapters are missing the environmental impacts of the no action alternative. By neglecting the no action alternative, a reader of the EIS cannot fully understand the impacts of the other five alternatives. This deficiency is pointed out below by chapter.

Additionally, there are some major omissions from the EIS. One relates to the removal of the waste from the SE Pit and how that removal may cause increased noise and other impacts from the BioEnergy Washington's landfill gas processing facility. Figure 8-3 in the draft EIS (page 8-18) clearly shows sound attenuation by the SE Pit area. No mitigation or detail of sound attenuation after the SE Pit removal is discussed in the EIS.

Another major omission is related to land use and the use of the buffer. Any "sanitary operations" in the buffer area will require modification of the 1960 Special Use Permit since the permit prohibits any sanitary operations in the buffer and requires that a 1,000 foot buffer strip surrounding the entire site be left in its natural state for the protection of the surrounding properties. These permit requirements prohibit any addition, alteration, or removal of waste and soil, and any other construction in the 1,000' buffer. Removal of waste from the buffer is considered sanitary operations and will require altering the 1960 Special Use Permit.

The 1,000 foot buffer contains the former alcohol treatment center or new Passage Point facility. Passage Point may soon be occupied by 150+ parents and children, living in apartments and paying

subsidized rent, within the Cedar Hills Landfill buffer. Low income housing cannot and should not be allowed within the Cedar Hills Landfill 1,000' buffer since it cannot be considered an allowable use of a landfill's buffer, when considering the requirements of the 1960 Special Use Permit. Passage Point will not provide for the requirements of the Special Use permit, specifically, Passage Point does not maintain or restore the buffer to "its natural state for the protection of the surrounding properties." King County must restore this site to its natural state and provide the 1,000' buffer as required by the Special Use permit.

I have ordered my comments by chapter, highlighting the specific chapter and section my comments/questions are directed toward. Thank you for your careful consideration. I look forward to an improved Final EIS.

Sincerely,

Sean Kronberg

CHAPTER 2: Alternatives

Section 2.3.6

By excavating previously landfilled areas, the Solid Waste Division could recuperate a lot of soil, however the impacts from the ongoing excavation, odor, construction noise and other impacts from this construction is not adequately discussed. More details about the impacts associated with excavation of the SSWA is needed.

Section 2.3.9

This section mentions *"potential operational modifications could include the following…"*
How can "potential actions" be clearly evaluated? Most of the potential actions are without the proper descriptions of mitigation and impacts resulting from the five alternatives. For example, soil surcharging would impact dust, noise, vibration, and other related environmental impacts, yet they are not described when the soil surcharging is discussed in the EIS. Those specific impacts must be considered by the EIS and documented within it.

Section 2.4.1

Alternative 1 would "*include removal of soil and solid waste from the SE Pit Refuse Area*." This is in the required 1,000' buffer, yet the 1960 Special Use permit (appendix A) prohibits any sanitary operations in the buffer. Figure 2-2 clearly shows the large section of the buffer that would be disturbed.
The special use permit states:

> *"A 1,000' buffer strip surrounding the entire site will be left in its <u>natural state</u> for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."*

Since this is in the buffer, this would be outside the "active area" referred to in many of the chapters, and could have significant impacts not identified in the Draft EIS.

Removal of SE Pit area would remove the birm or hill that currently exists between the Landfill Gas to Pipeline Gas facility and the neighborhood to the East. This would have significant impacts related to noise, potential vibration from the compressors, and potentially other impacts that are currently mitigated by the SE Pit area. Ingenco and BEW have completed at least two noise studies and both document the benefits of this hill East of the gas facility. By removing the SE Pit, the Solid Waste Division must document the impacts from the gas facility and suggest mitigations within the EIS.

Section 2.4.2

Alternative 2 would *"include removal of soil and solid waste from the SE Pit Refuse."* This is in the required 1,000' buffer, yet the 1960 Special Use permit (appendix A) prohibits any sanitary operations in the buffer. Figure 2-3 clearly shows the large section of the buffer that would be disturbed.
The special use permit states:

> *"A 1,000' buffer strip surrounding the entire site will be left in its <u>natural state</u> for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."*

Since this is in the buffer, this would be outside the "active area" referred to in many of the chapters, and could have significant impacts not identified in the Draft EIS.

Removal of SE Pit area would remove the birm or hill that currently exists between the Landfill Gas to Pipeline Gas facility and the neighborhood to the East. This would have significant impacts related to noise, potential vibration from the compressors, and potentially other impacts that are currently mitigated by the SE Pit area. Ingenco has completed at least two noise studies, and both document the benefits of this hillside East of the gas facility. By removing the SE Pit, the Solid Waste Division must document the impacts from the gas facility and suggest mitigations within the EIS.

Section 2.4.3

Alternative 3 would *"include removal of soil and solid waste from the SE Pit Refuse."* This is in the required 1,000' buffer, yet the 1960 Special Use permit (appendix A) prohibits any sanitary operations in the buffer. Figure 2-4 clearly shows the large section of the buffer that would be disturbed.

The special use permit states:

> *"A 1,000' buffer strip surrounding the entire site will be left in its natural state for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."*

Since this is in the buffer, this would be outside the "active area" referred to in many of the chapters, and could have significant impacts not identified in the Draft EIS.

Removal of SE Pit area would remove the birm or hill that currently exists between the Landfill Gas to Pipeline Gas facility and the neighborhood to the East. This would have significant impacts related to noise, potential vibration from the compressors, and potentially other impacts that are currently mitigated by the SE Pit area. Ingenco has completed at least two noise studies, and both document the benefits of this hillside East of the gas facility. By removing the SE Pit, the Solid Waste Division must document the impacts from the gas facility and suggest mitigations within the EIS.

Section 2.4.3 says *"relocated facilities may be placed within the buffer near the southeast corner of the CHRLF."* However, figure 2-4 shows the SE Pit may also be used for the relocation of facilities. There is no mention of the potential impacts of relocating facilities within the East buffer and there must be. The 1,000 ft. buffer is there to provide protection to the residential neighborhood to the East. With relocated facilities, this neighborhood would be significantly impacted by relocated facilities to the SE Pit location.

Section 2.4.4

Alternative 4 would "*include removal of solid waste from the SSWA and the southern portion of the main hill (SE Pit Refuse Area, Southwest Main Hill Refuse Area, and East Main Hill Refuse Area)…*" Some of these areas (SE Pit) are in the required 1,000' buffer, yet the 1960 Special Use permit (appendix A) prohibits any sanitary operations in the buffer. Figure 2-5 clearly shows the large section of the buffer that would be disturbed.

The special use permit states:

> *"A 1,000' buffer strip surrounding the entire site will be left in its natural state for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."*

Since some of these areas are in the buffer, this would be outside the "active area" referred to in many of the chapters, and could have significant impacts not identified in the Draft EIS.

Removal of SE Pit area would remove the birm or hill that currently exists between the Landfill Gas to Pipeline Gas facility and the neighborhood to the East. This would have significant impacts related to noise, potential vibration from the compressors, and potentially other impacts that are currently mitigated by the SE Pit area. Ingenco has completed at least two noise studies, and both document the benefits of this hillside East of the gas facility. By removing the SE Pit, the Solid Waste Division must document the impacts from the gas facility and suggest mitigations within the EIS.

Section 2.4.4 says that relocated facilities may be placed in the SE Pit Refuse Area. There is no mention of the potential impacts of relocating facilities within the East buffer and there must be. The 1,000 ft. buffer is there to provide protection to the residential neighborhood to the East. With relocated facilities, this neighborhood would be significantly impacted by relocated facilities to this location.

Chapter 4: Air and Odor

Section 4.2.1

This section mentions *"a formal Complaint Response Plan created by King County that commits King County to respond rapidly with specific actions and time frames."* I've lived directly next to the CHRLF for over 5 years and was unaware of this formal plan. The plan should be included either within this chapter or as an additional appendix in the EIS.

Section 4.2.2

This section states, *"Odor impacts could occur to neighboring communities as a result of CHRLF and other odor producing operations in the immediate area such as Cedar Grove Composting. Because of the odor control program at CHRLF, the landfill's contribution (when and if it occurred) to an odor cumulative impact is likely less than that from other sources."*

Impacts from neighboring facilities do not need to be identified in the Cedar Hills Regional Landfill site development plan alternatives Environmental Impact Statement and probably should not be. The impacts from odors have been significant in the past (an example is the odor lawsuit the County settled a few years ago) and may be significant in the future depending on the alternative chosen. This fact is missing from the draft EIS and should be more fully described in the final.

There are cumulative impacts from the odors produced by CHRLF. It does not matter that CHRLF is less or more than other odor producing neighbors, but rather what direct and indirect impacts there are from the odors produced by CHRLF.

Cumulative impacts would also include the additional years of potential odor from CHRLF as a result of Alternatives 1-5. This is not identified in the Draft EIS.

Within section 4.2.2, the number of complaints is described. The odor complaint data is taken from two different sources, yet the reporting dates are different: the staff at CHRLF documented complaints are from Jan 2008 through April 15th 2009. Puget Sound Clean Air Agency complaint numbers are from July 13, 2007 through July 13, 2009. First of all, data for such an important impact should examine more than the 1.8 years and 2.5 years as noted above. Odor complaints received should be documented for both CHRLF staff and PSCAA for 5 years. This will give a much better idea of the actual number of past odor complaints. Also, avoiding documenting the complaints from the summer of 2009 is inappropriate, since I called at least 10 times myself this past summer about odors from the CHRLF.

This section also documents the number of odor complaints received by PSCAA in the area and the number of those complaints that PSCAA identified Cedar Grove Composting facility as the suspected source. How many of those 728 complaints was the Cedar Hills Regional Landfill identified as a potential source? You fail to document the number of times CHRLF was identified as a potential source, but do include the number that Cedar Grove Composting was identified as a potential source.

Chapter 5: Surface Water

Chapter 5's first paragraph says the chapter will discuss the *"impacts foreseen by implementing one of the alternatives, and potential mitigation measures."*
The chapter should not only discuss one of the alternatives, but all of them.

Section 5.1
Section 5.1 fails to include the affected areas around the CHRLF where surface water is dispersed. Instead, it says the affected environment includes *"the regional drainage basins that fall within the landfill property limits and the on-site drainage."*

Section 5.1.2
Section 5.1.2 says *"the lagoon was sized to contain flows resulting from the 100-year, 24-hour storm and 46.4 acres of the landfill. In addition, construction in 2009 will increase the lagoon's capacity to approximately 28.4 acre-feet."*
Has this increase in the lagoon's capacity already taken place in 2009?

Section 5.1.4
Section 5.1.4 *says "The monitoring reports for 2007 and 2008 indicate that parameter concentrations in stormwater samples from the landfill fall well below their respective benchmark values, or effluent limits, <u>most of the time</u>…"*
What does "most of the time" mean? Be more specific and explain when the landfill does not fall within its benchmark values or effluent limits. What happens when it exceeds the limit?

Section 5.2.1
Section 5.2.1 talks a lot about *"the assumptions noted above,"* yet I cannot find the word "assumption" prior to section 5.2.1. What assumptions are being referred to?

Section 5.2.1 does not state what the impacts will be for each of the alternatives. In some of the other chapters there is a description of how the different alternatives will impact the environment; this is missing in chapter 5. Since surface water quality is so important, generalizing by stating "assumptions noted above" is not acceptable in an environmental impact statement.

Section 5.2.2
How can there be no indirect or cumulative impacts? Because of the significant increased acreage that would eventually be covered by the final cover over the finished areas, there would be a significant increase in the amount of surface water that would end up offsite. This is not accounted for or described in the EIS. Alternative 1 may have a smaller impact on surface water and alternative 5 may have a much larger impact because of the larger acreage it would cover. Will there be any increased flows offsite? Specifically, there are areas to the S, SE, NE and E which have year-round and seasonal streams from the surface water runoff from the CHRLF. Will these flows increase due to the increase in landfilled areas? What specific drainage solutions will be needed for the development of each of the alternatives?

Chapter 6: Groundwater

Section 6.1.5
Section 6.1.5 discusses the contamination that has been found, but then concludes *"these results are consistent with past sampling events and indicate that groundwater quality in the regional aquifer is not affected by operations at the landfill."* How can any contamination be consistent with past sampling? What is the source of the contamination and is increased mitigation needed?

Section 6.1.5
Section 6.1.5 states *"Groundwater is protected by an impermeable landfill liner as well as the underlying dense glacial till."* Isn't this only true in some areas of the CHRLF? This should indicate that an impermeable landfill liner does not exist below all the waste, and should probably include the specific areas that do and do not have a liner.

Within chapter 9 (9.1.2) it states *"Groundwater monitoring indicates that some local perched groundwater zones have been contaminated by leachate or landfill gas, while there is no indication of contamination of the regional aquifer."* Why is this <u>not</u> mentioned in Chapter 6, the Ground Water chapter? Shouldn't the contaminated groundwater be described in detail within the Groundwater chapter? Where has this contamination been located? What risks do they pose now and in the future?

Chapter 7: Upland Vegetation, Wetlands, and Wildlife

Chapter 7 does not discuss the environmental impacts of the No Action Alternative option at all. Since landfilling at the CHRLF would stop around 2018, the impacts of the no action alternative would be less, and should be detailed within this chapter.

Section 7.2.2

Section 7.2.2 states *"No indirect or cumulative impacts to upland vegetation, wetlands, and wildlife would be anticipated as a result of implementing any of the alternatives."* How is that possible given that *"relocation of facilities within the southeast corner of the buffer would require removal of up to 21 acres of upland vegetation"*?

This section is also missing indirect impacts such as those from the possible relocated facilities to the SE corner of the CHRLF, the removal of vegetation from the SE corner, which would have indirect impacts on the environment, animals, and vegetation.

Section 7.4

Section 7.4 incorrectly states *"No significant unavoidable adverse impacts to upland vegetation, wetlands, and wildlife would be anticipated during construction or operation of any of the alternatives."* How can there be no significant unavoidable adverse impacts to upland vegetation, wetlands, or wildlife given that "Relocation of facilities within the southeast corner of the buffer would require removal of up to 21 acres of upland vegetation"?

Chapter 8: Noise and Vibration

Section 8.1.5

Section 8.1.5 says *"The area around the landfill is hilly and heavily wooded, and a 1,000-foot-wide forested buffer zone separates residences west of the landfill from landfill activity."*

Many of the expansion activities will occur less than 1,000 feet from the CHRLF boundary, and will occur in the Eastern buffer, such as the removal of waste from the SE Pit and possible facility relocation to the South Buffer and SE Pit. No noise studies or mitigations are discussed concerning these details within the alternatives. Specific noise mitigation must be detailed for noises that are within the 1,000 foot wide buffer, and for work done in areas that does not have the benefit of a "forested buffer zone," such as on the East side of the CHRLF. Removal of waste from and relocation of facilities in the South and East buffers will have environmental impacts related to noise, which is completely missing from chapter 8.

In 4 of the 5 alternatives the SE Pit birm or hill will be removed. No impacts or mitigation are mentioned related to removing a hill that currently blocks the noise from the Gas Plant. Since the SE Pit area is in the buffer (not forested), it could have significant impacts <u>not</u> identified in the Draft EIS. Removal of SE Pit area would remove the birm or hill that currently exists between the Landfill Gas to Pipeline Gas facility and the neighborhood to the East. This would have significant impacts related to noise, potential vibration from the compressors, and potentially other impacts that are currently mitigated by the SE Pit area. Ingenco and BEW have completed at least two noise studies and both document the benefits of this hill East of the gas facility. By removing the SE Pit, the Solid Waste Division must document the impacts from the gas facility and suggest mitigations within the EIS.

The special use permit states:

> "A 1,000' buffer strip surrounding the entire site will be left in its <u>natural state</u> for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."

Suggested mitigation: restore the buffer fully on the Eastern side of the landfill. Remove the old CHAT buildings and restore the buffer to the appropriate state of the buffer: its natural state, forested.

Chapter 9: Human Health

Chapter 9 is completely missing the environmental impacts of the No Alternative option. I would expect if land filling ended around 2018, the environmental impacts to Public Health would be less than any of the other 5 alternatives. The health related impacts of the no action alternative should be included in chapter 9.

Section 9.1.2
Section 9.1.2 states, *"Groundwater monitoring indicates that some local perched groundwater zones have been contaminated by leachate or landfill gas, while there is no indication of contamination of the regional aquifer."* Why is this not mentioned in Chapter 6, the Ground Water chapter?

Section 9.2.2
9.2.2 discusses the odors from the landfill and other odor producing neighbors. It states, *"the landfill's contribution (when and if it occurred) to an odor cumulative impact would likely be much less that that from other sources."* The EIS should not compare the landfill to "other source" of odor, but rather describe the cumulative effect of the odors from the landfill. Smelling the landfill again and again during the summer months is commonplace for me and my neighbors. The EIS does not adequately address the odor and potential for odors in the future if alternatives 1-5 are chosen, especially considering King County settled a lawsuit stemming from odor in recent years. As the EIS states, a variety of health effects (such as nausea, loss of appetite, etc.) can be an indirect impact of odor. The health department can give you many more impacts such as physiological impacts resulting in a variety of health problems.

Unpleasant odors lower the quality of life for individuals living in close proximity to odor-emitting sources. So, control measures and mitigation related to the specific alternatives should be specifically described in the EIS, not generalized.

Section 9.3
Section 9.3 discusses mitigation measures, but is not specific. I would suggest this section be much more specific. What mitigation measures? What is the "rigorous management program" and how has it been implemented? What have been the outcomes from this "rigorous management program"? What are the goals of it in the future?

Section 9.4
Section 9.4 states, *"With commitment to the mitigation measures summarized above…"* Where are they described above (I can not find specific mitigation measures)? More specific mitigation measures are needed for each of the 5 alternatives.

Chapter 10: Land Use

Section 10.1
Section 10.1 mentions *"the vacated alcohol treatment center…"* Is it vacated? What about the Passage Point facility in which King County contracted the YWCA to provide low income housing and social services at the alcohol treatment center?

Since the YWCA facility will be within the King County Regional Landfill's buffer, the land use related to this site must be address in the EIS. Currently it is not.

Land Use related questions:
Who is responsible for what land use is allowed within the CHRLF?
Who is responsible for what land use is allowed within the CHRLF's buffer?
What land uses are allowable in the CHRLF buffer, given the Cedar Hills Landfill's buffer is present "for the protection of the surrounding properties" as well as the other restrictions placed on the buffer in the land use permit?

Section 10.1 says "*The CHRLF site includes the landfill facility and, near the eastern site boundary, the vacated alcohol treatment center…"* Since the "vacated alcohol treatment center" (soon to be occupied by the YWCA and over 150 low income parents and their children) is considered part of the CHRLF site, is this area included as part of the CHRLF buffer? How will King County Solid Waste mitigate the land uses that are taking place within the CHRLF buffer?

The CHRLF Special Use Permit does <u>not</u> allow any other uses of the buffer. It says that "a 1,000' buffer strip surrounding the entire site will be left in its <u>natural state</u> for the protection of the surrounding properties." How are low income apartments (for which the residents will be paying rent) considered "for the protection of the surrounding properties?" Because the land occupied by Passage Point is a part of the CHRLF, the Solid Waste Division is responsible for the impacts resulting from uses within the CHRLF buffer, including Passage Point. The EIS completely avoids this topic, and it should not. It must address the environmental impacts resulting from uses of the CHRLF buffer.

Considering 4 of the 5 alternatives may remove waste from the SE Pit area, what mitigation in the "vacated alcohol treatment center" area will be implemented to minimize those impacts, since no vegetation exists in this area, as required by the original permit?

Section 10.1 states *"King County is considering a proposal to provide housing, employment, and counseling services for men and women who have recently been released from incarceration or hospitalization, or who are homeless, and wish to reunite with and act as caregivers to their children."* King County is not considering this proposal. King County has already issued building permits for Passage Point in October 2008. Since October 2008, a Superior Court Judge overturned those permits, finding the use not allowable. There still exists a contract between King County and the YWCA for the Passage Point project. I would suggest a correction be made to this section so it is accurate.

Is a proposal such as "housing, employment, and counseling services…" allowable in the buffer of the CHRLF?

Section 10.1 mentions that "No landfilling activities occur in the eastern landfill buffer." While no landfilling occurs now, there has been placement of waste in the Eastern buffer in the past, this fact

should be mentioned and described in detail. While the Solid Waste Division would never place waste in the 1,000 foot buffer now, against the Special Use Permit, admission that this has occurred in the past should be stated openly and honestly. If mitigation is planned in the future to correct those mistakes, a full description should be included, stating what impact on the Special Use Permit removal of waste from the 1,000 foot buffer would have.

4 of the 5 Alternatives propose removing waste from the SE Pit, part of which is within the buffer. While this is not the placement of new waste, this is considered "sanitary operations". The 1960 Special Use permit (appendix A) prohibits any sanitary operations in the buffer. It states: "A 1,000' buffer strip surrounding the entire site will be left in its natural state for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access." The Draft EIS states that a change to the Special Use Permit would be required to relocate facilities into the East and South buffer areas (this does not include the placement of waste into the South or East buffer areas). The Draft EIS also states that a change to the Special Use Permit would not be required for the removal of waste from the SE Pit area, even though the SE Pit is in the East buffer. Why is there a difference between removal of waste from the SE Pit and the placement of facilities in the SE Pit? Both of these actions are sanitary operations, and are prohibited by the 1960 Special Use permit, so both would require a change to the permit.

Section 10.1 states "King County Parks has also operated a native plant nursery on approximately 6 acres of the treatment center site since 1997." What land use code and permit allowed for the native plant nursery operation? Is this type of land use allowed in the buffer of the CHRLF, considering the restrictions in the 1960 Special Use Permit?

Section 10.2.1

Section 10.2.1 says "for the most part, all alternatives are confined within the boundaries of the existing landfill site and inside the existing 1,000-foot-wide buffer." This is not true. Four of the 5 Alternatives call for the removal and potential relocation of facilities to within the 1000 East and/or Southern buffer.

Section 10.2.1 states "*Most construction activities would take place inside of the buffer.*" If facilities are relocated to within the buffer, ongoing, long term affects would be felt by nearby residents that border that buffer. While landfill related construction activities would occur inside of the buffer, there would be ongoing operations, construction, and other activities in the buffer itself. These impacts are not addressed within the draft EIS and should be.

Within section 10.2.1, it states that alternative 2 would be consistent with the current Special Use Permit from 1960, yet alternative 2 says it *"may include removal of soil and solid waste from the SE Pit Refuse Area."* The Special Use permit states *"A 1,000' buffer strip surrounding the entire site will be left in its natural state for the protection of the surrounding properties. There will be no sanitary operations in this strip other than access."* Any removal of soil and solid waste from the SE Pit, which is partially in this buffer strip, would not be allowed by the 1960 Special Use permit.

Within section 10.2.1, it states *"a modification to the Special Use Permit would be needed for Alternative 3 to allow the relocated facilities within the buffer."* Actually, modification would be required for the relocated facilities within the buffer as well as the removal of solid waste and soil from the SE Pit Refuse Area.

Within section 10.2.1, related to alternative 4, it states a modification to the Special Use Permit would be needed to allow the relocated facilities within the buffer and the removal of solid waste and soil from the SE Pit Refuse Area. Alternative 4 proposes to locate facilities within the Eastern buffer, near residential areas, including the residential, Section 8, low income housing contracted by King County through the YWCA. Why is this Section 8 housing and social services not considered when the draft EIS examined the impacts of the 5 Alternatives (noise, light, vibration, buffer encroachment, human health, etc.)? Is the low income housing within the CHRLF buffer considered the same as the other nearby residences? If not, why? The residents of Passage Point will be paying rent and living near the landfill just like any other citizen of King County. Shouldn't the EIS talk specifically about the health, human, and environmental impacts as it related to the Passage Point project located within the CHRLF buffer?

Page 10-24 within Chapter 10 talks specifically about the impacts of the no action alternative. <u>All other chapters should do the same</u>.

Section 10.2.2

Section 10.2.2 is incorrect when it states there will be no indirect impacts to land use because the alternatives would not change off-site land uses. What about on-site land uses that might change due to the alternatives? If the no action alternative was chosen, there would direct and many indirect impacts to land uses on and off the CHRLF site, i.e. no landfilling on the site.

Section 10.3

Section 10.3 incorrectly states there would be no impacts. See comments related to 10.2.2 above.

Chapter 13: Transportation

Chapter 13 completely disregards the no action alternative. No comparison to the amount of traffic that occurs with Alternatives 1-5 and the traffic with the no action alternative.

Chapter 13 does discuss the "current conditions" compared with Alternatives 1-5, but fails to mention that traffic would decrease on Cedar Grove Road after 2018 if the no action alternative was chosen. A complete analysis and comparison to the no action alternative should be included in the traffic chapter of the EIS.

Chapter 16: Comparative Cost Analysis

Where do the numbers come from in table 16-1? There is no supporting information or background related to those numbers. For example, it states *"the No Action Alternative would consist of exporting solid waste to an alternative (out of County) landfill at $53.75 per ton."* The table then says the no action alternative would cost $559,653,000 for both the NPV of Waste Export and CHRLF O & M Costs and Total NPV of Costs ($2009). How did we get from $53.75 to $559,653,000?
Considering the detail in the other chapters (chapter 8 for example), additional detail and sources for the numbers should be provided in Chapter 16.

Chapter 16 does not take into consideration the costs of the environmental impacts. What environmental costs do we incur by continuing to landfill within King County?

Also, comparing only to out-of-county landfilling is not a true representation of the potential options. What about other alternatives available to King County other than out-of-county landfilling?

King County
Department of
Natural Resources and Parks
Solid Waste Division

RECEIVED
King County DNRP
NOV 10 2009
Solid Waste Division
Engineering Services Section

Cedar Hills Regional Landfill
2009 Site Development Plan
Draft Environmental Impact Statement
Public Comment Form

We welcome your comments on the *Draft Environmental Impact Statement (EIS)* for the Cedar Hills Regional Landfill Site Development Plan. Please use the space below, and if needed, please use the back of this sheet or attach additional pages. **Comment period ends November 6, 2009.**

Name and address (optional) MIKE KRZYCKI 16423 230th Ave SE

#6 alternative as "NO ACTION ALTERNATIVE"

this alternative by itself has an environmental impact, even with no change to existing operations, there is no current data in the EIS regarding # alternative

No MENTION of Gases, TOXIC WASTE ALSO being released during any dig out of South pit and SE pits, this option is in 4 out of the 6 options

Comments must be postmarked by Friday, November 6, 2009 to be considered.

Ways to submit your comments on the Draft EIS:

- Give your oral comments to the court reporter at the Oct. 22, 2009 public hearing
- Online: www.kingcounty.gov/solidwaste
- Send a letter or this comment form to: King County Solid Waste Division, Attn: Mizanur Rahman, 201 S. Jackson St., Suite 701, Seattle, WA 98104
- Send an email to: mizanur.rahman@kingcounty.gov

Material available in alternate formats. Call 206-296-4466, TTY Relay: 711.

King County
Department of Natural Resources and Parks
Solid Waste Division

RECEIVED
King County DNRP
NOV 10 2009
Solid Waste Division
Engineering Services Section

Cedar Hills Regional Landfill 2009 Site Development Plan Draft Environmental Impact Statement

Public Comment Form

We welcome your comments on the *Draft Environmental Impact Statement (EIS)* for the Cedar Hills Regional Landfill Site Development Plan. Please use the space below, and if needed, please use the back of this sheet or attach additional pages. **Comment period ends November 6, 2009.**

Name and address (optional) MIKE KRZYCKI 16423 230th Ave SE

Chapter 11 - Glare, the BEW plant has a tremendous glare from the flame coming out of the stack more so than not since April of this year, the glare from this flame can be seen on the sides of my neighbors house at night

* also the noise from this BEW plant has not been addressed at all in the EIS

Comments must be postmarked by Friday, November 6, 2009 to be considered.

Ways to submit your comments on the Draft EIS:

- Give your oral comments to the court reporter at the Oct. 22, 2009 public hearing
- Online: www.kingcounty.gov/solidwaste
- Send a letter or this comment form to: King County Solid Waste Division, Attn: Mizanur Rahman, 201 S. Jackson St., Suite 701, Seattle, WA 98104
- Send an email to: mizanur.rahman@kingcounty.gov

Material available in alternate formats. Call 206-296-4466. TTY Relay: 711

King County
Department of
Natural Resources and Parks
Solid Waste Division

RECEIVED
King County DNRP
NOV 10 2009
Solid Waste Division
Engineering Services Section

Cedar Hills Regional Landfill 2009 Site Development Plan Draft Environmental Impact Statement

Public Comment Form

We welcome your comments on the *Draft Environmental Impact Statement (EIS)* for the Cedar Hills Regional Landfill Site Development Plan. Please use the space below, and if needed, please use the back of this sheet or attach additional pages. **Comment period ends November 6, 2009.**

Name and address (optional) MIKE KRZYCKI R-7 16423 230th Ave SE

Re: Chapter 8 NOISE & VIBRATION TABLE 8-1
No mention of Rockets and explosions used @ site
for bird control - very Loud

No mention of Back up Beepers on Equipment

Re: Noise monitor location R-7 is taken from the street 230th
Not Residential property line border (closet to noise) also
my neighbor to the west of me is even closer

Southe East 1000' Buffer is not heavily wooded as
stated in 8.1.5 discription

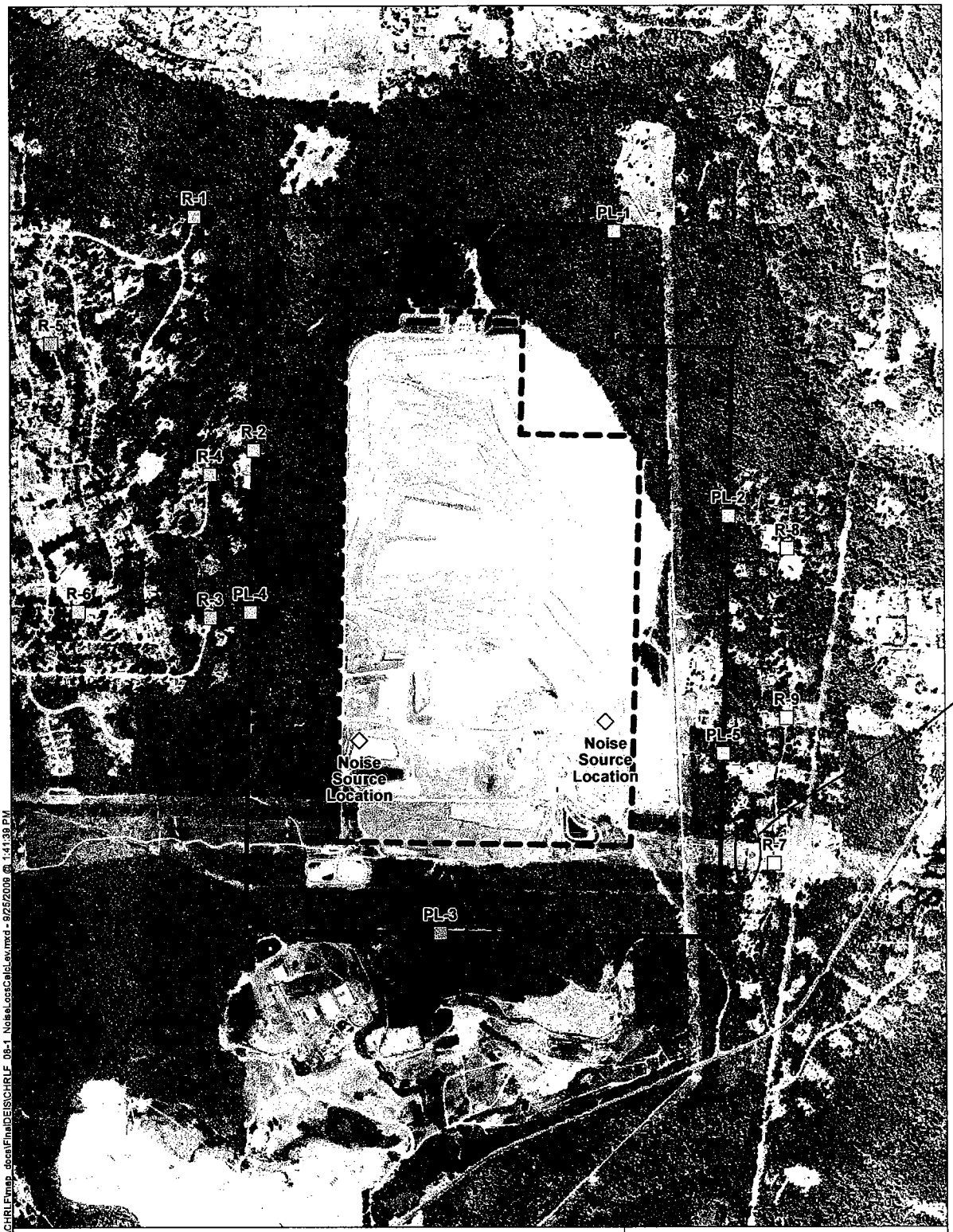
NOISE measurements taken when the trees have all of
there leaves on them, LOT NOISIER IN WINTER

Comments must be postmarked by Friday, November 6, 2009 to be considered.

Ways to submit your comments on the Draft EIS:

- Give your oral comments to the court reporter at the Oct. 22, 2009 public hearing
- Online: www.kingcounty.gov/solidwaste
- Send a letter or this comment form to: King County Solid Waste Division, Attn: Mizanur Rahman, 201 S. Jackson St., Suite 701, Seattle, WA 98104
- Send an email to: mizanur.rahman@kingcounty.gov

Material available in alternate formats. Call 206-296-4466. TTY Relay: 711



PROPERTY LINE CLOSEST TO THE NOISE

Noise Measurement Location

CHRLF_NoiseLevel

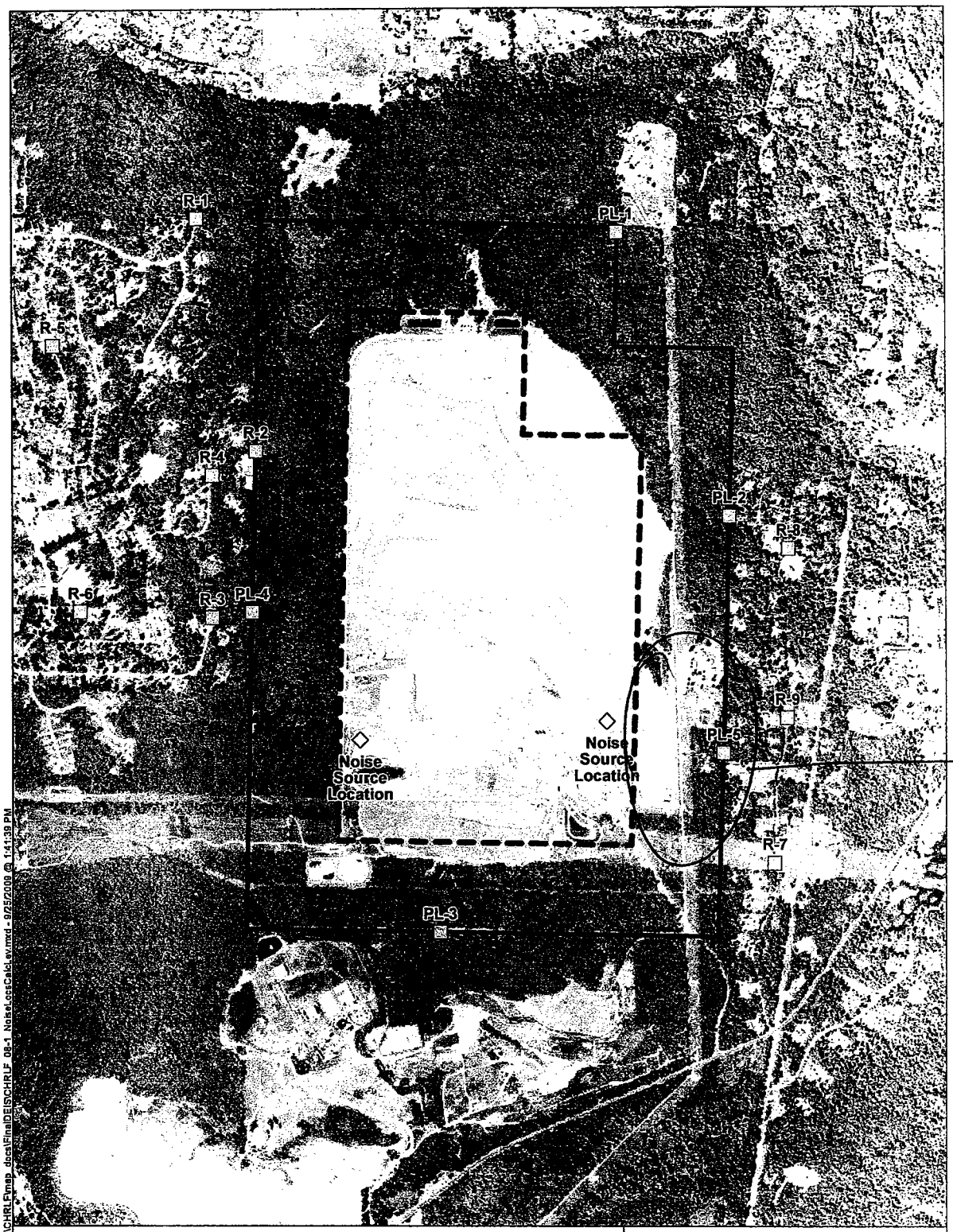
Cedar Hills Regional Landfill Boundary

1000-Foot Buffer Boundary

0 500 1,000
Feet

FIGURE 8-1
Noise Measurement Locations

D:\GISDATA\projects\washkingco\CHRLF\map_docs\Final\DES\CHRLF_08-1_NoiseLocsCalcLev.mxd - 8/26/2008 @ 1:41:39 PM



NOT HEAVILY WOODED

Noise Measurement Location

CHRLF_NoiseLevel

Cedar Hills Regional Landfill Boundary

1000-Foot Buffer Boundary

N

0 500 1,000

Feet

FIGURE 8-1
Noise Measurement Locations

D:\GIS\DATA\projects\weshkinco\CHRLF\map_docs\Final\DEIS\CHRLF_08-1_NoiseLocsCalcLevel.mxd - 8/25/2009 @ 1:41:39 PM

King County
Department of
Natural Resources and Parks
Solid Waste Division

RECEIVED
King County DNRP
NOV 10 2009
Solid Waste Division
Engineering Services Section

Cedar Hills Regional Landfill
2009 Site Development Plan
Draft Environmental Impact Statement
Public Comment Form

We welcome your comments on the *Draft Environmental Impact Statement (EIS)* for the Cedar Hills Regional Landfill Site Development Plan. Please use the space below, and if needed, please use the back of this sheet or attach additional pages. **Comment period ends November 6, 2009.**

Name and address (optional) MIKE KRZYCKI 16423 230th Ave SE

NOISE if the hill shown is removed it will be noisier to residences located on 230th Why not leave it and plant trees?

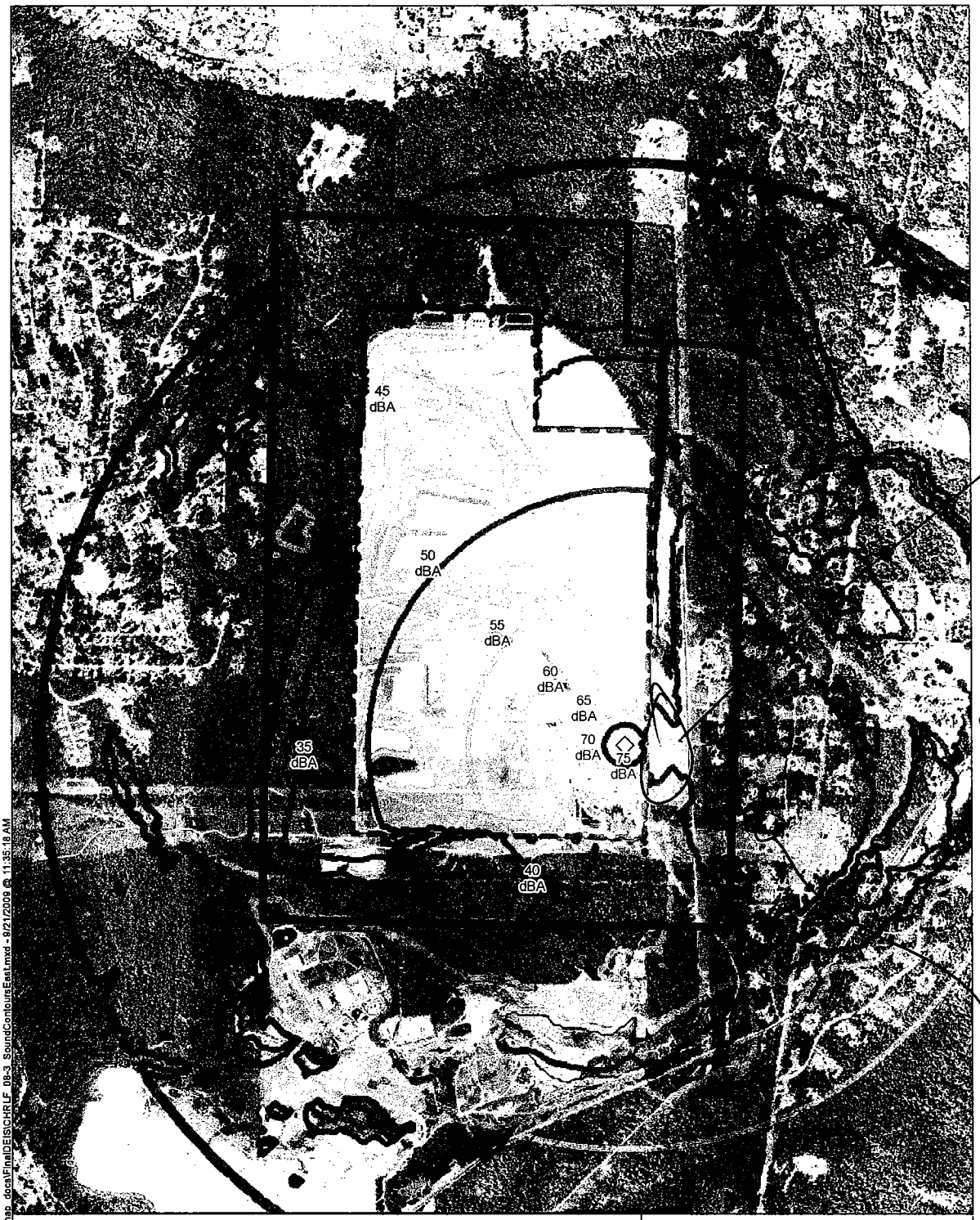
there is no mention of what you will be doing regarding the BEW plant regarding noise if the hill is removed

Comments must be postmarked by Friday, November 6, 2009 to be considered.

Ways to submit your comments on the Draft EIS:

- Give your oral comments to the court reporter at the Oct. 22, 2009 public hearing
- Online: www.kingcounty.gov/solidwaste
- Send a letter or this comment form to: King County Solid Waste Division, Attn: Mizanur Rahman, 201 S. Jackson St., Suite 701, Seattle, WA 98104
- Send an email to: mizanur.rahman@kingcounty.gov

Material available in alternate formats. Call 206-296-4466. TTY Relay: 711



This is a Hill, where will the DB's be when Removed

my House

75 dBA
70 dBA
65 dBA
60 dBA
55 dBA
50 dBA
45 dBA
40 dBA
35 dBA

Noise Source Location
Cedar Hills Regional Landfill Boundary
1000-Foot Buffer Boundary

0 800 1,600
Feet

Note: Noise levels shown do not include up to 10 dBA of additonal attenuation due to intervening vegetation.

FIGURE 8-3
Estimated Sound Contours Eastern Worst Case Scenario

D:\GISDATA\projects\wash\kingco\CHRLF\map_docs\FinalDEIS\CHRLF_DB-3_SoundContoursEast.mxd - 9/21/2009 @ 11:35:18 AM

Environmental Health Services Division
401 Fifth Avenue, Suite 1100
Seattle, WA 98104-1818
206-205-4394 Fax 206-296-0189
TTY Relay: 711
www.kingcounty.gov/health

Public Health
Seattle & King County

November 6, 2009

Mizanur Rahman, Ph.D.
Project Manager
Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104-3855

Re: Draft Environmental Impact Statement
Job Title: Cedar Hills Regional Landfill 2009 Site Development

Thank you for the opportunity to provide feedback to your agency during the Draft EIS comment period ending November 6, 2009. Public Health has the following comments concerning your listed alternatives for the Cedar Hills Regional Landfill 2009 Site Development Plan - Draft Environmental Impact Statement:

Alternative 1 – Southwest Corner Development

1) Recovered Soil from Old Refuse Areas:
Public Health has had a long standing practice that dirt within three feet (vertically and horizontally) of municipal refuse in landfills shall be designated the same as that waste. Therefore, soils within three feet of the old refuse may not be reused as daily cover material unless the soils do not exceed Model Toxics Control Act (MTCA) soil cleanup level standards using a method of analysis appropriate for the site's land use classification.

2) Stockpiling on Areas 5, 6, and 7:
Public Health will require prior approval of any stockpile materials to ensure that the integrity of the interim covers and cells will not be compromised.

Alternative 2 – Southwest Corner and Main Stockpile Development

1) Recovered Soil from Old Refuse Areas:
Public Health has had a long standing practice that dirt within three feet (vertically and horizontally) of municipal refuse in landfills shall be designated the same as that waste. Therefore, soils within three feet of the old refuse may not be reused as daily cover material unless the soils do not exceed Model Toxics Control Act (MTCA) soil cleanup level standards using a method of analysis appropriate for the site's land use classification.

2) Stockpiling Soil on site:
Public Health will require prior approval of any stockpile areas to ensure that the integrity of the landfill would not be compromised.

Alternative 3 – South Side Development with Partial Wall

1) Recovered Soil from Old Refuse Areas:
Public Health has had a long standing practice that dirt within three feet (vertically and horizontally) of municipal refuse in landfills shall be designated the same as that waste. Therefore, soils within three feet of the old refuse may not be reused as daily cover material unless the soils do not exceed Model Toxics Control Act (MTCA) soil cleanup level standards using a method of analysis appropriate for the site's land use classification.

2) Stockpiling Soil on site:
Public Health will require prior approval of any stockpile areas to ensure that the integrity of the landfill would not be compromised.

3) Facility Relocation Areas:
Currently, surface water runoff from these areas such as the full trailer parking area is being collected through the leachate collection system. Will there be leachate collection systems installed at the relocation areas?

Alternative 4 – South Side Development Including Support Area and Partial Main Hill

1) Recovered Soil from Old Refuse Areas:
Public Health has had a long standing practice that dirt within three feet (vertically and horizontally) of municipal refuse in landfills shall be designated the same as that waste. Therefore, soils within three feet of the old refuse may not be reused as daily cover material unless the soils do not exceed Model Toxics Control Act (MTCA) soil cleanup level standards using a method of analysis appropriate for the site's land use classification.

2) Stockpiling Soil on site:
Public Health will require prior approval of any stockpile areas to ensure that the integrity of the landfill would not be compromised.

3) Facility Relocation Areas:
Currently, surface water runoff from these areas such as the full trailer parking area is being collected through the leachate collection system. Will there be leachate collection systems installed at the relocation areas?

Alternative 5 – South Side Development Including Support Facility Area

1) Recovered Soil from Old Refuse Areas:
Public Health has had a long standing practice that dirt within three feet (vertically and horizontally) of municipal refuse in landfills shall be designated the same as that waste. Therefore, soils within three feet of the old refuse may not be reused as daily cover material unless the soils do not exceed Model Toxics Control Act (MTCA) soil cleanup level standards using a method of analysis appropriate for the site's land use classification.

2) Stockpiling Soil on site:
Public Health will require prior approval of any stockpile areas to ensure that the integrity of the landfill would not be compromised.

3) Facility Relocation Areas:
Currently, surface water runoff from these areas such as the full trailer parking area is being collected through the leachate collection system. Will there be leachate collection systems installed at the relocation areas?

4) Landfill-Gas-To-Energy (LFGTE) Facility:
It appears that portions of the proposed landfill areas will abut the LFGTE facility boundary. Will there be any impacts from the proximity of the waste disposal area(s) to the LFGTE facility and the gas pipes that lead into it?

If you have any questions concerning these comments, please call Yolanda Pon at 206-263-8459 or Ed Davis at 206-263-8518. We look forward to your response to our comments/questions in the EIS Summary of Public Comments as well as any responses directly back to Public Health.

Sincerely,

Bill Lasby

Bill Lasby, Supervisor
Solid Waste, Rodent, and Zoonotic Disease Program
BL:mp

cc: Kevin Kiernan, P.E., Director, Solid Waste Division
Bill Lawrence, Section Manager, Environmental Hazards Section, PHSKC
Ed Davis, Health and Environmental Investigator III, PHSKC
Yolanda Pon, Health and Environmental Investigator II, PHSKC

From: King County Solid Waste Division [website.swd@kingcounty.gov]
Sent: Tuesday, October 06, 2009 7:21 PM
To: Alexandre Mazepa
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Alexandre Mazepa
ADDRESS: Issaquah, WA 98027
EMAIL: avm91@hotmail.com
COMMENTTYPE: Request
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: Our family request is to stop any future landfield development and extensions. Thank you.

Alexandre and Marina Mazepa
IMG_VERIFY: green

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: 10/6/2009 7:21:19 PM

FAX

ATTN. Mizanur Rahman

Fax Number 206-296-8431

Phone Number

FROM Rick Brighton

Fax Number 425-226-6943

Phone Number

SUBJECT Comments on Draft EIS

Number of Pages 4

Date 11/6/2009

MESSAGE

From; Leslie Morgan 20924 SE 155th Pl Renton, WA 98059

King County Solid Waste Division regarding comments on current EIS for alternatives

The only alternative that would be satisfactory is that of no change to current operating permit. All alternatives that allow any encroachment of the 1000 ft buffer and extending the life of Cedar Hills will have additional impacts on the surrounding community. Understanding that this is cost driven is clear and has always been the driving force to continued revisiting of site development. This community has been repeatedly impacted with the current facility operating permit. We now are experiencing noise from the landfill to gas facility that causes such impacts that people can't sleep at night , have to keep their windows closed to try to mitigate the noise in their home, and listen to the noise when being out in their yard . Homes have experience vibrations in their homes when the facility has to put the gas back into the flares. (enclosed dates that homes experienced these events.) When the EIS was done on this facility we were told that King County would still own the land and lease it to this company. We were told that this would allow them to have more control over the facility and it's operations. The noise impacts are unbearable at times but all we are told is that there has never been a facility of this size and that we will have to work with the owner. As a landlord King County has not protected us in anyway but has monetarily benefited from this facility. When looking at the alternatives all of these will increase noise at levels that may be unacceptable for a residential area during the construction phases. I would like modeling and studies done on each alternative with accumulative noise from the Landfill, Cedar Grove Compost, and the Gas to energy facility including the times of construction and expansion with true and relative findings. Also please take into consideration seasonal noise studies since we all know and recognize in the winter noise does increase. Again the only thing between us and the landfill is the 1000ft. buffer.

The 1000 ft buffer has been the only constant over the years and even with this it has repeatedly been violated with no accountability from King County Solid Waste. We are still waiting for reforestation of the Western Buffer to be effectively done. There has been garbage dumped in the buffer. This 1000 ft buffer was placed there at a time when the Landfill was not designed to take in the capacity that we are currently at. It is needed more than ever to protect the community and instill a commitment from King County Solid Waste to the people it directly affects.

The height of the Landfill should never be allowed to exceed the current permitted height using assumptions that it will settle to desired height. If increasing the height of the existing areas requires any exposure of landfill garbage what are the environmental impacts: odors, toxins, and increase noise with both the construction and increase soil stock piling and dumping of garbage? What about dust that will travel with possible stock piling soils at this height?

Opening up and removing garbage from existing areas of landfill would absolutely cause environmental impact's. Full studies again must be done to look at accumulative noise,

toxins, odors and all other problems that could be identified when opening any previously filled area.

Addressing proper flare back up with all alternatives when the Gas to Energy plants need to put gas back into flare system.

The current Council should be informed of the previous law suit that was a direct response from environmental impacts that caused loss of enjoyment of life and property for the surrounding community. This lawsuit settlement gave no protection to the county for future violations. Inform them that this community will be diligent in pursuing all necessary avenues to protect us from this facility or any permitted facility on Cedar Hills Site if they cause further impacts that effectively take away our right to enjoy life and property.

Does King County Solid Waste in their comprehensive plan have in place a waste export plan that will be in place at the time of current closer with existing permit?

What will the effects of property values be with each alternative? Some of these alternatives will have increased noise, toxins, odor either short term or long term. For instance if I were to put my property up for sale at a time when they were opening an area that has already been filled and the odors were increased Or if the height of the Landfill increases so it is now seen from my neighborhood or home where with the existing permit it is not. Looking at different markets of homes, such as a home that is the $800,000 price range. This being a more discriminate buyers market, buyers will not put up with these types of impacts. As the owner of a home we must disclose all the information of known impacts to buyers. Homes currently adjacent to the 1000 ft buffer can no longer tell buyers that there is a 1000ft buffer between the landfill and the surrounding area. The extension of life of the landfill will deter some buyers from buying, knowing that there will be increase capacity at this site and a closure date that far exceeds the current date.

Summary; All the alternatives have additional impacts to the surrounding area of Cedar Hills Landfill and should not be excepted due to these impacts on a community that is continuing to be impacted with the current facility. It would be negligent and irresponsible on the Councils part to approve any expansion that takes away a community's only protection from a landfill that never was originated to be the size it is. This buffer was put in place for this community and is not up for 'grabs' by King County to help it make money. It is time for King County to except a reasonable capacity at this Landfill, which is the current operating permit and seek other alternatives that will meet the needs of all their customers without placing an unfair burden on one community. Again if any of the other alternatives are chosen we will hold King County responsible for the real impacts that are experienced from their decision.

Respectfully;

Leslie Morgan

Further Signatures from residence same concerns that were included in my response to the EIS

Mark & Rachel Monte
20718 SE 155th Pl
Renton, WA 98059

ALAN + ROBIN RICHARDS
21111 SE 155TH PL.
RENTON, WA 98059

Michael & Heather Wedke
20731 SE 155th Street
Renton WA 98059

DENISE VANCE
21117 SE 155th PL.
RENTON, WA 98059

RICHARD NIEMAN &
FRECIA KELLY
20825 SE. 155TH PL
RENTON, WA 98059

Kim and Rick Brighton
21105 SE 155th PL.
Renton, WA 98059

DAVID & CHERRI LINNENKAMP
21026 SE 155th PL
RENTON, WA 98059

Also included are just brief dates that the landfill has recently had impacts on neighbors Rachael Monte reports that on Sept 6 she experienced vibrations at her home Sept 19,22.27 all dates of loud equipment noises and back up beepers at site.

Kim Brighton reported vibrations on Sept 6 as well as strong landfill odor . She reported this to landfill employees and they explained the situation.

Leslie Morgan also noticed increase noise of equipment on Nov 4 at 10:00 PM

When talking to one another we have all had problems with the Gas to Energy Plant noise which is why we feel it is imperative that you included this in the accumulative over all effect of noise coming directly from the Landfill site and realize you obligation as Owner of the Cedar Hills Landfill.

From: King County Solid Waste Division [website.swd@kingcounty.gov]
Sent: Saturday, October 03, 2009 6:53 PM
To: James Morris
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: James Morris
ADDRESS: Renton, WA 98059
EMAIL: mrrsjs@msn.com
COMMENTTYPE: Suggestion
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: Dear Mizanur Rahman,

Cedar Hills Regional Landfill 2009 Site Development Plan
Re: Extension of landfill's lifetime

The fact that the Cedar Hills Landfill was developed under local resident protest and the county subsequently lost a class action lawsuit because of various local residential environmental damages does not bode well for its continuation passed the year 2018 closing date. The cost factors as stated are not inclusive of the potential for another lawsuit.

The existence of a landfill near residential communities has an inherent cause of reducing home and land value. Mitigating development cannot affect the land value as seen through real estate norms. Therefore those that live near the Cedar Hills Landfill's location will automatically be at a disadvantage. To offset this reduction in real estate value the county would need to provide means to improve this value. The past class action lawsuit provided one answer but something more lasting and permanent should be realized for the future of this area. Installation of sewers and subsequent street improvements in the communities along with the proposed environmental impact requirements could be a possible solution. This would increase the cost of extending the landfills life past the year 2018 but retain a semblance of King County actually caring for its citizens. As of today the executive or executive to be and council are thought of as inept at running the county as it should be.

If it were up to the citizens in the near proximity of the land fill this proposal would be voted down unless there were some good faith reciprocation by the county.

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: 10/3/2009 6:52:35 PM

From: SWD, WebSite
Sent: Wednesday, October 07, 2009 7:27 PM
To: SWD, WebSite
Cc: Rahman, Mizanur
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: John Olson
ADDRESS: Maple Valley, WA 98038
EMAIL:
COMMENTTYPE: Suggestion
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: We all know you will do what you want anyway, but my opionion is to leave the situation as is and then as it nears the end of 2018, find other options. I have lived near this stinkhole, now stink-moutain since 1965 and am quite tired of it, time to move on... Thank you for taking time to read this and now you can throw it away...
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: 10/7/2009 7:27:13 PM

10/27/2009
7:50:06 AM

Program:
Draft 2009 Comprehensive Solid Waste Management Plan

Type:
Problem

Kay Palmer
Address: Renton, WA 98059

Comments:

We live within 2000 ft of the Cedar Hills site and simply cannot consider having the facility open beyond the current estimated dates. The entire area suffers health issues related to both the landfill and the composting. We have owned our home here since 1975 and the situation has worsened considerably as the amounts of fill per day increased. Please do not extend the operation beyond current estimates. There needs to be alternatives developed for long term and this proposal avoides the larger issue of waste disposal in the future.

King County

Wastewater Treatment Division
Environmental Planning and Community Services
King Street Center, KSC-NR-0505
201 South Jackson Street
Seattle, WA 98104-3855

November 19, 2009

Mizanur Rahman, Ph.D.
King County Solid Waste Division
Department of Natural Resources and Parks
King Street Center
201 South Jackson Street, Suite 701
Seattle, WA 98104

Dear Mr. Rahman

The King County Wastewater Treatment Division (WTD) has reviewed the Draft Environmental Impact Statement for the Cedar Hills Regional Landfill 2009 Site Development Plan. King County is requesting that the King County Solid Waste Division do the following:

- Submit construction drawings for the project to our Asset Management section for review during design development so that King County staff can assess project impacts. Please send drawings to:

  Eric Davison, Local Public Agency Administrator
  King County WTD Asset Management
  201 South Jackson Street, KSC-NR-0508
  Seattle, WA 98104-3855

- Provide calculations of additional leachate discharge quantities;
- Modify the existing industrial waste discharge permit.

Thank you for the opportunity to review and comment on this proposal.

Sincerely,

Meredith Redmon
Water Quality Planner
Environmental Planning & Community Services

cc: Eric Davison, Local Public Agency Administrator, Engineering & Asset Management

King County

Wastewater Treatment Division
Environmental and Community Services
King Street Center, KSC-NR-0505
201 South Jackson Street
Seattle, WA 98104-3855

RECEIVED
NOV 04 2009
CIP LPA'S

Routing Memo

November 4, 2009

TO: Eric Davison, Local Public Agency Administrator, Engineering, & Asset Management

FM: Meredith Redmon, Water Quality Planner, Environmental Planning Community Services

RE: Asset Management Review

OAP Ref No: 765

Agency File No.: N/A

Document/Agency: DEIS / King County DNRP Solid Waste Division

Project Description: DEIS evaluating 5 alternatives to extend the useful life of the Cedar Hills Landfill.

Location: Cedar Hills Regional Landfill.

Please review the attached document and indicate below what type of response, if any, is needed. Please respond by **November 6, 2009.** If you have any questions, please call me at 263-6534.

(1) ☐ There is no apparent conflict with King County wastewater facilities. No response is needed.

(2) ☐ Sewer extension plans and modifications should be submitted to King County for review and approval. Drawings should be sent to Eric Davison.

(3) ☐ A King County facility (name of facility) _____

is located within or near the site (describe location and attach drawing)

_____

_____

In order to protect this wastewater facility, King County is requesting that the agency do the following:

(SEE #'s 3 & 5)

☒ Submit construction drawings for the project to Eric Davison, Local Public Agency Administrator in Asset Management. Eric can be contacted at (206) 684-1707.

NOV 04 2009

Drawings should be submitted for review during design development so that King County staff can assess the project's impacts. Drawings should be sent to:

Eric Davison, Local Public Agency Administrator
Asset Management
King County Wastewater Treatment Division
201 South Jackson Street, KSC-NR-0508
Seattle, WA 98104-3855

☐ Please contact Eric Davison a minimum of 72 hours prior to commencing any construction in order to allow staff time to arrange for a King County Inspector to be on the site during construction.

(4) ☐ King County has a permanent easement for a sewer line on the proposed development site, and we must be assured the right to maintain and repair the sewer line, and, in the event that the line must be relocated, a new permanent easement must be provided.

☐ Please send the name, address, and telephone number of the property owner of the proposed development site to Eric Davison by mail at the address above, by phone at 206-684-1707, by e-mail at eric.davision@kingcounty.gov so he can contact the property owner regarding the easement.

☐ Please contact Shirley Marroquin, Acting Permitting Compliance and Property Acquisition Supervisor, regarding the easement at 206-263-3699, by e-mail at shirley.marroquin@kingcounty.gov or by mail:

Permitting Compliance and Property Acquisition
King County Wastewater Treatment Division
201 South Jackson Street, KSC-NR-0503
Seattle, WA 98104-3855

☐ Provide evidence of liability insurance and enter into a save-harmless agreement with King County. Please contact Shirley Marroquin as noted above.

NOV 04 2009

(5) ☒ Please request the following information or actions from the agency:
① MODIFICATIONS TO EXISTING INDUSTRIAL WASTE DISCHARGE PERMIT.
② CALCULATIONS OF ~~[illegible]~~ ADDITIONAL LEACHATE DISCHARGE QUANTITIES.

(6) ☐ As-Built drawings are attached. Please include the drawings in the response to the agency.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

11/05/09

Mizanur Rahman,
King County Department of Natural Resources and Parks
Solid Waste Division
201 South Jackson Street, Suite 701
Seattle, WA 98104-3855
mizanur.rahman@kingcounty.gov

RE: Cedar Hills Regional Landfill, 2009 Site Development Plan (Ecology #09-5817)

Dear Mr. Raham:

Thank you for the opportunity to comment on the Environmental Impact Statement for the Cedar Hills Regional Landfill, 2009 Site Development Plan. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

Excavating waste from unlined areas
Ecology is pleased that all of the alternatives described include excavating waste from the unlined South Solid Waste Area and placing the refuse in a lined cell. Removing waste from unlined areas greatly reduces the risk of leachate or landfill gas impacting groundwater quality. For this reason we would like to see refuse removed from unlined areas in the eastern buffer zone also, as shown on Figures 2-2 through 2-5.

The EIS does not provide the reason why excavating the SE Pit area is included and how the County would decide whether or not to include it as part of Alternatives 1, 2, or 3.

Results of site investigations indicate saturated conditions are present in the bottom of the SE Pit. Excavating in this area would require special measures to work in wet conditions and manage the leachate encountered.

Soil surcharging
The EIS states that soil surcharging may impact horizontal landfill gas collectors in the uppermost layer and below the thickest portion of the stockpile. The EIS should also address the impact to the cover system on areas that have already undergone final closure. If soil is stockpiled on closed areas, Ecology expects the County would implement a rigorous inspection and repair/replacement program for the landfill gas collectors and the cover systems.

Stockpiling on closed areas of the landfill would require approval from Public Health – Seattle & King County.

If you have any questions regarding the above comments, please contact Madeline Wall at (425) 649-7015.

Ecology's comments are based upon information provided by the lead agency. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Tammy Sacayanan
SEPA Coordinator
Department of Ecology
(425) 649-7000

(S#: 09-5817)

cc: Madeline Wall, Ecology

From: Litras, Tami on behalf of SW Comp Plan Comments
Sent: Friday, November 06, 2009 3:53 PM
To: Rahman, Mizanur
Cc: Varo, Chris; SWD, WebSite
Subject: FW: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Mizan,
This comment relates to the CHL SDP Draft EIS, not the Draft 2009 Comprehensive Solid Waste Management Plan.

Thanks,
Tami

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Thursday, November 05, 2009 9:36 PM
To: David Sheridan
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Draft 2009 Comprehensive Solid Waste Management Plan

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: David Sheridan
ADDRESS: Maple Valley, WA, 98038
EMAIL: davesher@comcast.net
COMMENTTYPE: Suggestion
PROGRAM: Draft 2009 Comprehensive Solid Waste Management Plan
COMMENTS: I am writing to voice my concern regarding the proposed expansion of the Cedar Hills Landfill. I believe that this landfill should be phased out, for the following reasons.
Firstly, the amount of truck traffic on Maple Valley Highway and Cedar Grove Road, is excessive. Secondly, the smell of the dump and Cedar Grove Compost is unbearable, especially during the summer months. Thirdly, the health effects of the methane burning and release of gasses due to the landfill need to be studied for adverse health effects. Last of all, I do not believe it is equitable for one landfill to absorb the majority of King County""s waste, with the burden being left on the local residents. As King County is so strict on it""s environmental stand in so many ways, I can not see how they can turn around and support further expansion of the landfill. I would like to see the landfill phased out by 2018, if not sooner. Sincerely, David Sheridan, Maple Valley resident

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: 11/5/2009 9:36:00 PM

From: SWD, WebSite
Sent: Thursday, October 15, 2009 12:38 PM
To: Diane J. Sheridan
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Diane J. Sheridan
ADDRESS: Maple Valley, WA 98038
EMAIL: djsheri@aol.com
COMMENTTYPE: Request
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: NO ACTION ALTERNATIVE. Close the landfill.
IMG_VERIFY: black

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: 10/15/2009 12:38:02 PM

PUBLIC OPEN HOUSE

Maple Valley Community Center

Thursday, October 22, 2009

Maple Valley, Washington

PUBLIC COMMENTS

Reported by: Linda M. Grotefendt, CCR
License No. 3013

Lars Sorensen, 19420 Southeast 174th Street

MR. SORENSEN: Sometimes there's a pretty strong smell, odor, in the morning and the night, early morning and sunset at night. It usually comes in the sunset and the sunrises. That's really when it smells.

MS. SORENSEN: Sometimes, like, when it's really cloudy of misty. That's when it smells.

MR. SORENSEN: At night, we can see a strong work light from the facility over there. We live on the mountain; across, basically. So it stays on the whole night, pretty much.

(End of comment.)

(End of public comment.)

CERTIFICATE

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, LINDA M. GROTEFENDT, a Certified Shorthand Reporter and Notary Public in and for King County, Washington, do hereby certify that I reported in machine shorthand the above public comments; that the foregoing transcript was prepared under my personal supervision and constitutes a true record of the testimony of the said witness.

WITNESS my hand and seal in Renton, County of King, State of Washington, this 26th day of October, 2009.

_____

Notary public in and for the
State of Washington, residing
at Renton.

My commission expires 1-2-2012.

From: SWD, WebSite
Sent: Thursday, October 15, 2009 10:19 AM
To: SWD, WebSite
Cc: Rahman, Mizanur
Subject: WEB SITE COMMENT: Cedar Hills Regional Landfill site development

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: GLENN VAN WINKLE
ADDRESS: ISSAQUAH, WA. 98027
EMAIL:
COMMENTTYPE: Request
PROGRAM: Cedar Hills Regional Landfill site development
COMMENTS: LOOK FOR ANOTHER SITE, DO NOT MAKE THIS LANDFILL ANY BIGGER!
IMG_VERIFY: BTZ

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: 10/15/2009 10:18:42 AM

From: Varo, Chris
Sent: Monday, November 02, 2009 4:36 PM
To: Rahman, Mizanur
Cc: SWD, WebSite
Subject: FW: WEB SITE COMMENT: King County Solid Waste Division

Here's another Site Development comment.

Chris

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Saturday, October 31, 2009 9:18 AM
To: Denise R Vogel
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: King County Solid Waste Division

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Denise R Vogel
ADDRESS: Renton
EMAIL: dddvogel@msn.com
COMMENTTYPE: Problem
PROGRAM: King County Solid Waste Division
COMMENTS: We purchased a home that backs your fence 9 years ago anticipating that the landfill would close as promised. This 4.7 acres is to be our retirement home and we plan to enjoy gardening and developing our estate in our retirement years. We are extremely angry that there are not any plans to try to move the site but only to increase its impact on this neighborhood. Maple HIlls has done more than its share at relieving the county of its garbage burden. We hardly ever have half a can of garbage because we recycle,and compost yet we have to pay for a full service and the noise and odor of the landfill on top of that. Why should we be punished for the mismanagement of others?
Denise and David Vogel
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: 10/31/2009 9:17:58 AM

10/31/2009
4:30:46 PM

james westveer
Address: issaquah, wa, 98027

Program:
Draft 2009 Comprehensive Solid Waste Management Plan

Type:
Suggestion

Comments:
This is in response to the 2009 Site development Plan, Draft Enviornmental Impact Statement, Public Comment (Sept 30-Nov 6, 2009)

Thank you for the opportunity for local land owners near the Cedar Hills Regional Landfill, to comment on the extention of use until 2030.

As a land owner in the area of the Cedar Hills Landfill, I have always been worried about the landfill accidentally or because fault in design, or because of an act-of-god; Damaging the aquifer that all of us who live in the area below the landfill, rely on for drinking water.

Over the past 30 years no one has ever tested our water supply to see if any run-off from the land fill has or is reaching the local aquifer, and you are not proposing any testing in the future, or financially planning for the possible disaster where hundreds of homes in the vicinity of the land fill, might become un-inhabitable because of the possible contamination of the aquifer.

I know your focus is on "where to put the garbage", but as you seem to have decided to continue putting it in the Cedar Hills facility, I for one, and many of my neighbors, would like to see a plan that would cover ALL possible problems and resolutions.

What would King County do if they polluted the ground water in this area? How would they know they have polluted the water, What would be the plans for rectifying the situation, and restoring the health of the aquifer? What intermediate steps would be taken for the poor land owner who would no longer have drinking water? What compensation will be available for the damages caused by the pollution of the aquifer?.

I am happy you are to build new administrative offices, but it does nothing to assure the public safety in this area. Or, dont you care?

Jim Westveer
14524 Issaquah-Hobart Road SE
Issaquah, WA 98027
425 999 9715
jwestveer@gmail.com

From: Claude Williams [ClaudeW@pscleanair.org]
Sent: Wednesday, October 28, 2009 4:38 PM
To: Rahman, Mizanur
Subject: FW: Tailoring Rule Published in Today's FR

Follow Up Flag: Follow up
Flag Status: Flagged

Mizanur,

I was not going to comment on the Draft KC EIS however there is a new wrinkle below. (Message from Agata). You might add a statement in the EIS about how new GHG rules (in addition to the reporting rule that came out last month) are about to be promulgated. And that you will be working with the Clean Air Agency to fold those into future Orders of Approval and/or a modification of the Title V permit.

v/r
Claude Williams,
Air Pollution Engineer II
Puget Sound Clean Air Agency
1904 3rd Ave – Suite 105
Seattle, WA 98101

ClaudeW@pscleanair.org
Direct: 206.689.4066

"Working together for clean air"

From: Agata McIntyre
Sent: Wednesday, October 28, 2009 7:21 AM
To: Claude Williams; Gerry Pade; Brian Renninger; Gretchen Jüttner
Cc: Steve Van Slyke
Subject: FYI: Tailoring Rule Published in Today's FR

Good morning everyone,

Here's a little more info on the proposed federal reg changes for GHG. The summary from the federal register says:

SUMMARY: EPA is proposing to tailor the major source applicability thresholds for greenhouse gas (GHG) emissions under the Prevention of Significant Deterioration

(PSD) and title V programs of the Clean Air Act (CAA or Act) and to set a PSD significance level for GHG emissions. This proposal is necessary because EPA expects soon to promulgate regulations under the CAA to control GHG emissions and, as a result, trigger PSD and title V applicability requirements for GHG emissions. If PSD and title V requirements apply at the applicability levels provided under the CAA, State permitting authorities would be paralyzed by permit applications in numbers that are orders of magnitude greater than their current administrative resources could accommodate. On the basis of the legal doctrines of ''absurd results'' and ''administrative necessity,'' this proposed rule would phase in the applicability thresholds for both the PSD and title V programs for sources of GHG emissions. The first phase, which would last 6 years, would establish a temporary level for the PSD and title V applicability thresholds at 25,000 tons per year (tpy), on a ''carbon dioxide equivalent'' (CO2e) basis, and a temporary PSD significance level for GHG emissions of between 10,000 and 25,000 tpy CO2e. EPA would also take other streamlining actions during this time. Within 5 years of the final version of this rule, EPA would conduct a study to assess the administrability issues. Then, EPA would conduct another rulemaking, to be completed by the end of the sixth year, that would promulgate, as the second phase, revised applicability and significance level thresholds and other streamlining techniques, as appropriate.

The full federal register posting is available at http://www.epa.gov/fedrgstr/EPA-AIR/2009/October/Day-27/a24163.pdf

Agata

From: Nancy Kruger [mailto:nkruger@4cleanair.org]
Sent: Tuesday, October 27, 2009 12:50 PM
To: Nancy Kruger
Subject: Tailoring Rule Published in Today's FR

To: NACAA Permitting Committee
NACAA NSR Committee

EPA published its proposed PSD and Title V Tailoring Rule in the *Federal Register* today (74 FR 55291). The rule is available at http://www.epa.gov/fedrgstr/EPA-AIR/2009/October/Day-27/a24163.pdf and also on the Permitting Committee page of Air Web. We will discuss this proposal and NACAA's comments on it on the upcoming Permitting Committee conference call, the date and time of which will be announced shortly (we are rescheduling the November call because the second Wednesday of this month falls on Veterans Day).

Nancy Kruger
Deputy Director
National Association of Clean Air Agencies
444 North Capitol Street, NW

Suite 307
Washington, DC 20001
tel: (202) 624-7864
fax: (202) 624-7863
nkruger@4cleanair.org
www.4cleanair.org

From: Varo, Chris
Sent: Friday, November 06, 2009 8:43 AM
To: Rahman, Mizanur
Cc: SWD, WebSite
Subject: FW: WEB SITE COMMENT: Facilities

Here's another comment.

Chris

-----Original Message-----
From: King County Solid Waste Division [mailto:website.swd@kingcounty.gov]
Sent: Friday, November 06, 2009 8:07 AM
To: Garry L. Wilson
Cc: SWD, WebSite
Subject: WEB SITE COMMENT: Facilities

Thank you for submitting the following comments via the Solid Waste Division Web site:

PERSONNAME: Garry L. Wilson
ADDRESS: Issa
EMAIL: puzzlebug@hotmail.com
COMMENTTYPE: Problem
PROGRAM: Facilities
COMMENTS: I am requesting you do not extend the life of the Cedar Hills Regional Landfill. We have lived in the South Issaquah area for over 20 years and the landfill has been a constant irritant. The smell emanating from the landfill is so strong that at times we cannot even go outside. This is not a rare occurrence; it happens frequently. As a result of this, our property values have been depressed by at least 25%. It is time to close the landfill and move it to a location less populated.
IMG_VERIFY: green

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: 11/6/2009 8:07:08 AM