

NERTS Draft EIS Comments:

- No Economic Analysis of impact to cities AS PROMISED (data from consultant presentation to City of Woodinville - July 18, 2023)
 - Woodinville expected to lose 4-5 businesses and at least 270 jobs (through 2040)
 - Woodinville is expected to lose \$287 million of business revenue (through 2040)
 - Woodinville stands to lose \$8.9 million in sales tax, King County stands to lose \$13 million in sales tax (through 2040)

- No Economic Analysis of impact to Washington Wine Industry
 - The City of Woodinville financially relies on its Tourist District which is located less than ½ a mile down the road from the proposed Woodinville site
 - Hundreds of millions of dollars have been invested by developers for the Harvest project
 - The Tourist Business Zone is the heart of the Woodinville Wine Country which benefits both the local and state wine industry

- EIS Section 3.13 Transportation – does not include any analysis of distance between the current Houghton site and the Woodinville site (distance between = 8.5 miles) and related environmental impact of additional fossil fuel usage (data from Fehr & Peers presentation to City of Woodinville - July 18, 2023)
 - 17 additional miles traveled x 300 truck trips per day x 5 workdays = 25,500
 - Assume 2/3 of the haulers come from south of Houghton =
16,830 additional miles each week
 - Estimated 659 self-haulers each day x 17 miles x 5 workdays = 56,015
 - Assume 2/3 of self-haulers come from south of Houghton =
36,970 additional miles each week

 - No analysis of the population density – 2/3 of population lives south of the Houghton site, only 1/3 live north
 - No analysis of additional costs to haulers for additional fuel
 - Any increased costs will be passed along to the consumer
 - No analysis of cost to haulers re: fuel and electric vehicle upgrades
 - These expenses will also be passed along to consumers

- King County Solid Waste Re+ Program uses the comparative metric of “tankers of gas saved” for success of waste diversion (composting, recycling)
 - How is the additional mileage required to drive to the Woodinville site in line with the Re+ goal of reducing greenhouse gas emissions?

- The King County Strategic Climate Action Plan (2020) specifically calls for “achieving 100% greenhouse gas reductions beyond 2030”
 - Siting the transfer station in Woodinville increases the miles traveled and, knowing that the majority of cars on the road are internal combustion, would **increase carbon emissions**
 - Carbon offsets alone will not get us to the goal of zero emissions
 - Investments into electric fleets cost \$\$\$ and ALL costs will be passed along to consumers, via the county and waste haulers (Waste Management)
 - Individual customers traveling to the transfer station will increase their carbon emissions by driving to the Woodinville location versus Houghton

- King County SCAP section GHG 1.3.4 specifically says that “the Wastewater Treatment Division and Solid Waste Division (SWD) shall each independently achieve carbon neutral operations by 2025”
 - How are the cynical policies of the SWD division that would **increase carbon emissions** via increased mileage to their own transfer station aligned with the carbon reduction goals?

- King County SCAP section GHG 1.4.3 states:
 - “Collaborate to set transparent standards to account for the net energy and GHG emissions impacts of government actions such as constructing transportation infrastructure and *providing services such as recycling* and transit and shall assess and publicly report these impacts as practicable, consistent with King County Comprehensive Plan Policy E-203.”
 - Recycling service expansion to the Woodinville location would result in net higher GHG emissions versus Houghton site (17 miles round trip from Houghton to Woodinville)
 - The Woodinville site is inconsistent with these stated priorities