

March 14, 2024



Pat McLaughlin  
Director, King County Solid Waste Division  
Department of Natural Resources and Parks  
201 South Jackson Street, Suite 5701  
Seattle, WA 98104

RE: Northeast Recycling and Transfer Station SEPA DEIS Comments

Dear Director McLaughlin,

The City of Woodinville would like to thank King County for the opportunity to comment on the draft environmental impact statement (DEIS) for the siting of the Northeast Recycling and Transfer Station (NERTS). We expect that County will make the right decision by not selecting Woodinville as the new NERTS site; this letter (in addition to other communications submitted by the City of Woodinville) will expand on the reasons as to why this is the case.

While the DEIS is an important step in the site selection process, it focuses only on a segment of the overall impacts the NERTS facility may have, and is itself a segmented and disconnected analysis of various environmental subcategories. The DEIS does not itself give a complete picture of the impacts of siting this facility in Woodinville. It is only a micro-examination of a sample of the thousand cuts that will ultimately do irreparable harm, ranging from environmental to economic, to Woodinville, King County, and the State of Washington. Relying too heavily on this document, which we believe to contain errors and omissions as laid out below, hinders the full disclosure and analysis of crucial factors essential for evaluating the NERTS siting locations. This omission deprives both the County and the public of essential information necessary for making informed decisions regarding the facility's location.

With respect to the DEIS specifically, our major comments fall into two areas:

First, we believe the DEIS does not sufficiently distinguish the impacts between the different alternatives studied. The initial site screening process did more to evaluate the desirability between sites on several elements evaluated in the DEIS. We think it is very important that decision-makers have these perspectives that are only possible with more robust differentiation between the three alternatives. At this stage of site selection, the proposal is conceptual, the analysis is programmatic/general, and the proposed mitigation measures are very generic in nature. There are noticeable gaps in the analysis, rendering it incomplete, and certain conclusions drawn seem to be inconsistent with the data presented. As an example, the environmental analysis suggests that Alternative 2 (Woodinville site) may have greater impacts to many elements of the environment, but without additional data and examination this finding does not adequately quantify the scale of environmental impacts. The impression given is that the impacts are likely minor, which is certainly not the case.

Second, we've pinpointed several data, methodological, and technical issues spanning various disciplines within the DEIS. These concerns primarily revolve around on-site, off-site, and cumulative environmental impacts. While many of these issues pertain to the evaluation of NERTS traffic impacts, they also extend to other environmental aspects. One notable area where improvement is needed is in providing deeper insight into the impact of changes to greenhouse gas (GHG) emissions based on the three alternative sites.

Additional comments on the County's site selection process are included at the end of this letter.

Our more specific concerns within the DEIS are addressed below.

## **TRANSPORTATION ENVIRONMENT**

Our transportation related concerns include the accuracy of emissions assessments, traffic modeling methodologies, and the lack of clarity on certain assumptions. Additionally, we believe that impacts on traffic congestion during construction, the impact on nearby corridors and communities, and the sufficiency of the analysis of future population growth have not been clearly addressed. Overall, our comments underscore the need for further clarification, additional data, and rigorous analysis to fully understand the cumulative impacts of the proposed alternatives on the transportation environment in Woodinville.

- The report states that the Woodinville site results in higher Vehicle Miles Traveled, specifically with trucks. However, the air quality section refers to the related increase in emissions as insignificant. Given many, if not all, of these vehicles are trucks, it is difficult to believe that this does not impact emissions. What are the assumptions used to make this determination? How has the County quantified the difference in the emissions between to the two alternative sites?
- The transportation report mentions a significant rise in emissions in various sections but fails to address the related impacts of these emissions, their causes, where they originate, who will be affected, or how to mitigate them.
- The report often references "waste being compacted." This is not defined in the traffic related sections but seems to include some assumptions on reduced vehicle generations. Can the DEIS clearly state what this is and what impact it has on the number or trucks per day generated by the site.
- Synchro reports provided do not have Intersection ID's that match the tables in the Transportation Report or in Chapter 3.13. This makes it very difficult to review the model inputs. Please update all report tables to coincide with revised analysis and model outputs and provide traffic models for review. (Source: Appendix H2)
- The analysis of the event related traffic conditions conflicts with data collected by the City. Per Appendix H Table 6, Special Events data was only collected during Saturday and Sundays and then compared to a normal weekday peak. However, the City's data (provided to the County as requested) shows that a peak Friday PM Special Event experiences approximately 14% higher

traffic than a normal (Tuesday, Wednesday, and Thursday) weekday peak hour. This analysis only considers a Saturday or Sunday event and ignores the impacts traffic related to a peak Friday special event that regularly occurs in the Alternative 2 (Woodinville) study area. (Source: 3-334)

- The No Action Alternative, "Freight Mobility and Access" alternative description is unclear. The first paragraph discusses a no action alternative, and the second paragraph seems to be discussing a different alternative. The wording related to compaction is confusing and conflicts with the first paragraph. What is the change in total truck trips with and without compaction? This should be evaluated and included as an alternative in the trip generation calculations. (Source: 3-345)
- All reports for the 148th Avenue NE/Woodinville-Redmond Road (SR 202) intersection show it operating at a higher than realistic LOS. The City's analysis and recent observations show the intersection operating at or close to a failing condition. Existing traffic counts for the northbound leg are more than 230 vehicles per hour lower than the City's counts (completed in 2023). It is unclear if the analysis was completed using Synchro or Sidra. Please confirm that the analysis was completed per the WSDOT standard modeling policy for roundabouts. (Source: 3347)
- What mitigation does the County propose for failing intersections? The intersection of NE 175<sup>th</sup> Street/Woodinville-Redmond Road (SR 202) is projected to fail level of service standards in both the County's analysis and the City's recent Transportation Plan Update. This project will further delay to the intersection where there's not a clear strategy for managing the traffic or ability to expand the intersection without causing more harm to active mode users. (Source: Appendix H)
- Trip distributions were not provided for the proposed site's trip generations. Woodinville Municipal Code requires that any intersection anticipated to have 10 or more additional AM or PM peak hour trips be included in the analysis. Please provide trip distribution volumes and confirm analysis meets the City's code. (Source: Appendix H)
- The County's forecasted volumes are 15-35% lower than the City's forecasted traffic volumes. The EIS uses only PRSC's future forecasts, which often under forecast volumes on local roadways. The City prepared a traffic analysis for the site which considered traffic generated by recently approved developments within the study area and a background growth rate of 2%. The City recently completed a Transportation Plan Update which included a travel forecast model update which would be more appropriate than using the PSRC's forecasts directly. (Source: Appendix H)

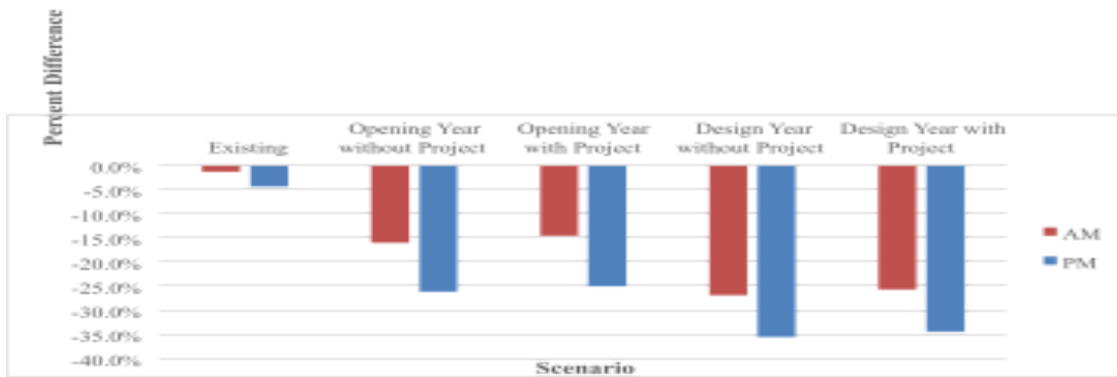


Figure 1: Forecasted Traffic Percent Differences

- The report mentions that during most of the construction activity, "the estimated volumes of truck traffic would likely peak during the early period of construction on roads designated for truck traffic." Further clarification is needed on the precise and complete analysis that went into the estimation and what exactly constitutes the "early period of construction." Does it refer to specific hours during the day, or is it more broadly related to the initial stages of the construction process? If construction traffic is anticipated to be higher during AM or PM peak hours for Alternative 2 (Woodinville), this could significantly impact local traffic within Woodinville. What is the duration of the construction activity and what time of year will it occur? What routes will construction traffic take, and how will they impact newly constructed and congested local streets? Consider whether import and export activities will coincide with outdoor recreational activities and special events such as concerts near the site. If they do, how will any potential disruptions or conflicts be mitigated? (Source: 3-352)
- As the Alternative 1 (Houghton) location already houses a transfer site, it is unclear why so many additional trucks are needed for import site preparation. Conversely, if this site were abandoned in favor of Alternative 2 (Woodinville), the removal of the existing site improvements would still be needed for any other development to occur. This seems to be common to both alternatives. Why is it only assumed under Alternative 1 (Houghton)? (Source: Appendix H)
- The import and export truck volumes make-up less than 1% of traffic on the adjacent corridors. It seems that the County only assumed the removal of existing infrastructure at the Houghton Site under Alternative 1. The existing infrastructure would need to be removed from the existing site to allow for any other development to occur, and it should be included as an assumption in both alternatives. Additionally, there is more site prep needed for Alternative 2 (Woodinville) due to the existing land use that would need to be removed. What are the vehicle emissions related to this construction activity? (Source: 3-355)
- Please provide additional information and calculations for the numbers provided in the Trip Generation Results for Action Alternatives table. No calculations were provided in either the appendix or the main report. We have the following questions related to the trip generations:

- o Why does the County assume that the project trip generation is the same in 2029 and 2040? All the other planning around transfer stations shows growth related to background population growth in the area being served. Growth in population results in more solid waste accumulation and transfer, which results in higher vehicle volumes at the site.
  - o Do self-haul estimates estimate also include estimates for self-haul being drawn from outside of the King County/service area? It would be expected that the Alternative 2 (Woodinville) site would likely draw additional solid waste self-haul that would not be as likely to use the site in Alternative 1 (Houghton) since it is close to the County/service area boundary.
- For the Alternative 2 (Woodinville) site, the report refers to a reduction in trips due to existing traffic volumes related to the existing land use. Traffic counts included in Appendix H show zero vehicles at the site driveway in the AM or PM peak hour. No reduction should be applied to the Alternative 2 site (Woodinville). (Source: 3-368)
  - The report states that "emissions from the No Action alternative would be higher than emissions under the action alternatives" due to fugitive dust and orders. Does this include the increased emissions due to an increase in solid waste and increased vehicle travel under that would be expected under the alternatives? (Source: 3-44)
  - Please define what impact or change compactors have on loads/weights, number of trucks expected, etc.? The report states that compactors will reduce transfer hauling trips by "nearly a third." Is this included in the truck trip forecasts and trip generations for the alternatives? Is there increased noise related to compaction that would not be realized under either of the alternatives or which should be analyzed? (Source: 3-44)
  - The report indicates that construction and operational vehicles are expected to disrupt normal traffic flow, resulting in additional vehicle emissions. Which corridors in the Alternative 2 (Woodinville) study area are expected to experience increased congestion, and who will likely be affected by the additional vehicle emissions? Given the study area's proximity to a school, major regional trail connections, outdoor concert venues, and downtown Woodinville, what are the health-related impacts of the additional vehicle emissions on the public during both construction and operations? Additionally, what is the expected change in overall greenhouse gas (GHG) emissions due to added delays within the network? (Source: 3-45)
  - The report states that Alternative 2 (Woodinville) "emissions would be less than those of the No Action Alternative because of the effect of compactors reducing hauling trips and improvements to the on-site traffic flows that minimize queuing." How do compactors improve vehicle queueing and traffic flow on site? What is the expected reduction in GHG, and vehicle emissions related to this reduction in queuing and traffic flow? (Source: 3-46)
  - The report assumes "nationwide mobile source air toxins are expected to be lower in the future, [and] long-term operations of the action alternative should result in a reduction of air toxic emissions." Is the assumption that overall background emissions from vehicles will be reduced in the future? This does not happen under 'a business-as-usual approach' without planned and

deliberate action to change our current emissions pattern. What are the strategies this analysis assumes will be taken that lead to a general reduction in emissions in the future? What are the specific strategies will be used during the construction of the alternatives and during future site operations to active reduce harmful emissions? (Source: 3-46)

- Please provide quantitative analysis of the air quality impacts and additional VMT related to Alternative 2 (Woodinville). Has the length of typical trip related to each alternative been considered, or is the only consideration related to the number of vehicles? Due to a longer average trip length between the site and customers in the service area, as well as the longer trip length between the site and the landfill, Alternative 2 (Woodinville) will result in longer trips under all scenarios. Compaction at either or both sites may reduce the number of trucks, reducing the VMT, but Alternative 2 (Woodinville) will still have greater VMT and emissions impacts due to the greater length of truck trips associated with the site. The DEIS includes no analysis of the comparative emissions production difference between the two alternatives given their inherent differing VMT expectations. (Source: 3-51)
- The report states that "traffic volumes are expected to increase under future year conditions, and safety conditions are anticipated to be similar to the No Action Alternative." However, the analysis only compares observed crash rates to critical crash rates calculated per the Highway Safety Manual. The safe system approach encompasses the built environment's role in safety management, including land use. The primary cause of transportation injuries and deaths is kinetic energy, which is positively associated with a vehicle's mass and speed, exceeding the human body's tolerance. The Alternative 2 (Woodinville) site is situated in an area with a high volume of pedestrians and cyclists, resulting in increased exposure at intersections and crossings. Given the increased vehicle volumes, vehicle mass associated with these types of operations, and exposure to active users, what data indicates that there will not be an increase in crashes? (Source: Appendix H)

## NATURAL AND BUILT ENVIRONMENTS

The DEIS raises several concerns across various elements of the environment. These concerns encompass factors such as air emissions, site proximity to hazardous sites, changes in wetland conditions, exposure risks, visual impacts, and land use effects. Additionally, we identify questions regarding the adequacy of mitigation measures and the consistency of conclusions within the report.

Overall, these points underscore the need for more thorough analysis and consideration of potential impacts and mitigation strategies in the decision-making process.

### Air Quality

- The DEIS identifies longer idling and a greater emission from change in travel patterns related to the Alternative 2 (Woodinville) site; however, no mitigation is identified. (Source: general comment on section)

## Hazardous Materials

- The DEIS Alternative 2 (Woodinville) site is on or near a greater number of sites with documented releases; this concentration of releases of contamination should be considered in the impact analysis. (Source: general comment on section)

## Wetlands

- The wetland on the Alternative 2 (Woodinville) site needs to be re-delineated since the original delineation was done in 2013. Since that time, the wetland may have changed, and area of wetland and buffer has had the opportunity to shift. (Source: general comment on section)
- There is an inconsistency between statements in the Wetlands section. For example, this section states that no direct or indirect impacts are expected. At the same time, the Plants & Animals section states that there are potential wetland impacts. (Source: general comment on section)

## Environmental Health

- There is a statement that the exposure related to Alternative 2 (Woodinville) will increase due the increase in distance and vehicle miles travelled to Cedar Hills Landfill would be insignificant. This statement is unsupported. What is the increase in Vehicle Miles Traveled and the exposure difference should be quantified? (Source: general comment on section)

## Aesthetics

- The analysis concludes that there would be an overall adverse visual impact to the Woodinville site. However, the site-specific analysis downplays not only the reality that the Alternative 2 (Woodinville) site has much greater visibility and greater change in aesthetics overall compared to other alternatives, but also ignores the surrounding land uses that are to be impacted and which rely heavily on the aesthetic environment for their financial viability and success. (Source: general comment on section)
- The adverse visual impact conclusion above seems potentially inconsistent with the conclusion that Alternative 2 (Woodinville) would reduce cumulative aesthetic impact compared to No Action. The statement does not consider increased cumulative development in the area overall, the numbers of potential viewers and relative visibility of the Alternative 2 (Woodinville). (Source: general comment on section)
- The proposed aesthetic mitigation is generic and does not consider how the City setback requirements and landscaping standards might affect visual impacts. If those effects cannot be determined at this conceptual stage of design, which they cannot, then the effectiveness of mitigation measures should be stated as more aspirational and with less certainty. (Source: general comment on section)

## Land Use

- The DEIS does not evaluate King County Code 10.08.03: Acquisition of solid waste disposal facilities. We understand that code language to say that the county may acquire solid waste

facilities through various means to accommodate solid waste disposal needs, ensuring compliance with comprehensive plans and all applicable regulations, including considerations for land use, fire and water quality, air quality, and aesthetics. It states specifically:

“Additionally, efforts should be made to distribute these facilities evenly across the county to prevent any single area from bearing an unfair burden... (emphasis added)” Please describe how the DEIS evaluates “unfair burden” in this case and how selection of Alternative 2 (Woodinville) is or isn’t congruent with that provision of King County Code when Woodinville is already home to at least one other major, albeit privately operated, regional solid waste processing facility (the Cascade facility operated by Waste Management). Would the selection of Alternative 2 (Woodinville) not violate the intent of King County’s own adopted Code?

- In the existing condition section describing the alternatives, the analysis should quantify the acreage of current uses around the potential site to support assessment of land use policies and indirect impacts of construction and operation of NERTS. As depicted in the graphics showing uses adjacent to the alternative sites, Alternative 2 (Woodinville) is clearly surrounded by the greatest number and variety of land uses relative to Alternative 1 (Houghton). This fact is not apparent in the DEIS discussion. (Source: general comment on section).
- The DEIS concludes that the NERTS facility under Alternative 2 (Woodinville) would result in a “moderate” adverse effect on eliminating the opportunity to develop the park, open, space or tourism uses. The factors considered in this statement to characterize these impacts as “moderate” are not defined and the conclusion appears arbitrary. (Source: 3-244)
- The DEIS finds that siting NERTS in Woodinville would not cause an indirect impact on the intensification or change in land uses in the vicinity of the site. In general, the analysis of indirect effects is very narrow and limited; intensification is only one potential result. Based on data in King County’s 2021 Buildable Lands Report, the Alternative 2 (Woodinville) site represents 31% of Woodinville’s supply of buildable acres of industrial land according to the report. A reduction of this magnitude would have a significant impact on planned land uses in the Tourist sub-area for example, and for economic development opportunities City-wide. The analysis should reconsider its characterization and underestimation of potential impacts. (Source: 3-242)
- Although King County has the authority to conduct separate environmental and economic analyses as per Comprehensive Plan policy, it's important to note that certain economic impacts, such as those affecting tourism or overall economic activity, are also considered indirect land use impacts in environmental documents. Even though a more detailed economic analysis will apparently be conducted separately in the site selection process, it's essential to address these indirect impacts at a general level in the Environmental Impact Statement (EIS). (Source: 3-248)
- Under the cumulative impacts analysis, the analysis concludes that no potential unique cumulative but non-significant impacts are anticipated in Alternative 2 (Woodinville). Considering the differences in land use and planned projects across the alternatives, did the analysis evaluate NERTS effect on future projects and land uses not meeting their potential development capacity? (Source: 3-248)



- While the analysis (we believe errantly) concludes that no impacts are likely and therefore no mitigation is necessary, the DEIS has identified NERTS as having a potential adverse effect on planned uses on the site. These conclusions are inconsistent. What are the potential adverse impacts specifically and what mitigation would be required to address this adverse effect. (Source: 3-248)
- The DEIS cites the King County Urban Growth Capacity Report that indicates that there is sufficient employment land supply and capacity within the City of Kirkland, but insufficient employment land supply and capacity in the City of Woodinville to accommodate adopted employment growth targets through 2035 and beyond. Further, the Woodinville site currently accounts for a large percentage of the buildable land capacity for employment uses in the City and DEIS does not disclose this data point, especially since the City does not currently have enough capacity to meet its planning targets. The DEIS says that there is additional discussion provided under each action alternative but Alternative 2 (Woodinville) does not contain any additional discussion on this issue.
- It is crucial to acknowledge that economic effects, equity concerns and other non-environmental factors should also play significant roles in a comprehensive siting decision. The Woodinville site, we feel, could result in pronounced economic effects relative to the other alternatives. However, this analysis was excluded from the DEIS process and to date there have been only vague assurances that a separate robust economic impact analysis is forthcoming.

### **Cumulative Impacts**

- In general, the cumulative impacts analysis is very generic, and its focus is blurred. It should seek to better analyze the project in the context of area-wide cumulative impacts not just those cumulative factors affecting the site itself. While appropriate for both Alternatives, this need is especially pronounced for Alternative 2 (Woodinville) given its location within what is the heart of the economic engine of the City: its tourist district. (Source: general comment)
- The growth and development context for the cumulative analysis is amorphous. Appendix I contains a list of reasonably foreseeable projects in Kirkland and it contains substantially more development than Woodinville. However, it has not identified or compared foreseeable development in terms of proximity and development characteristics, such as number of housing units, commercial square footage, etc. The lack of this more specific information could be misleading and makes it difficult to accurately compare the alternative sites. (Source: Appendix I)

### **Mitigation**

- The City emphasizes that the mitigation measures identified in the DEIS are both generic and incomplete. This follows from the conceptual status of the NERTS facility, evaluation of impacts at the site selection stage, and the programmatic level of analysis in the DEIS. Mitigation will need to be identified with greater project-specific and site-specific detail as project design progresses and to ensure that mitigation is accurate and effective. In addition, consistent with

requirement of the Growth Management Act, mitigation measures will need to reflect the development and design requirements of the host jurisdiction (WAC 365-196-550(6)(d)-(6)(e)). Our prior comments identify numerous instances where mitigation is vague or omitted and should be reevaluated in the Final EIS.

## CONCLUSION

In closing, the City reiterates our previous sentiments delivered during the scoping process that the selection of a site for the NERTS is one that will have a decades-long impact. Failure to produce a robust analysis of all impacts of such a facility is a disservice to the public, County decision-makers, and the host jurisdiction. Woodinville is committed to continuing to partner with King County Solid Waste Division (KCSWD) to ensure selection of the most suitable location for the NERTS.

Lastly, despite the City's persistent efforts to communicate its numerous concerns regarding the County's management of the NERTS siting initiative, we are deeply troubled by the environmental review process's failure to address our request for an assessment of economic impacts in the issuance of the DEIS. A comprehensive assessment requires careful consideration of both the impacts within the site and any potential effects on the local economy that the City has actively nurtured to promote wider prosperity for the residents of Woodinville, King County, and the State of Washington.

Of particular concern is the indication from KCSWD staff that the county's socio-economic impact analysis, which encompasses many of the City's concerns, will not be formally included in the DEIS nor readily accessible to the concerned public. This omission of a critical aspect from the NERTS evaluation represents a significant oversight that impedes a comprehensive understanding of the facility's impacts.

We strongly urge the county to reconsider this omission and incorporate the analysis into the public comment process.

The Woodinville tourism industry, driven by its unique wine cluster and scenic surroundings, attracts nearly 795,000 visitors annually. This industry, supported by local wineries, breweries, and distilleries, contributes significantly to the City and county economies through tourism-related taxable sales and job creation. However, siting a regional transfer station in Woodinville poses serious threats to this thriving industry, with potential impacts including increased traffic congestion, noise pollution, and pedestrian safety concerns, ultimately deterring visitors and harming local businesses.

The economic consequences extend beyond Woodinville, affecting King County and the broader Washington wine industry, underscoring the need for careful consideration of the transfer station's location to preserve the region's economic vitality. Our preliminary analysis of the transfer station's potential siting in Woodinville reveals that even a minor impact could reverberate significantly throughout the regional economy, influencing employment rates and tax revenues on a substantial scale.

Sincerely,

Mike Millman, Mayor  
City of Woodinville

Brandon Buchanan, City Manager  
City of Woodinville

Cc:

Dow Constantine, King County Executive  
Sarah Perry, District 3 Councilmember, King County  
King County Council  
Woodinville City Council