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June 11, 2013

Chris Eggen, Chair

Metropolitan Solid Waste Advisory Committee

King County Solid Waste Division

King Street Center 201 S. Jackson Street, Suite 701

Seattle, WA 98104

Dear Chair Eggen:

The Sound Cities Association (SCA) adopted a policy position in March 2013 requesting review and recommendations for appropriate updates to the Solid Waste Transfer and Waste Management *Plan.* Specifically, the policy adopted by SCA was as follows:

SCA requests that the Metropolitan Solid Waste Advisory Committee (MSWAC) and the King County Solid Waste Division review and recommend any appropriate updates to the 2006 Solid Waste Transfer and Waste Management Plan.

The Solid Waste Division (SWD) has expressed willingness to review this Plan and has asked for clarification of what SCA would like the review to include.

As you recall, we discussed this matter at our recent Board meeting, and you asked (as Chair of MSWAC) for staff to put together some additional detail to inform this discussion at MSWAC, and with SWD. SCA staff has worked with staff from member cities to assist in this effort.

As you know, SCA's policy position was informed by the significant reduction in solid waste tonnage and revised 2030 tonnage forecast as a result of the economic recession, as well as a 42% utilization rate of the total capacity of the transfer station system by the time the transfer stations reach the end of their expected useful lives. Three of the transfer stations identified in the Plan have not yet been constructed and therefore we have the opportunity to revisit the assumptions, basis and conclusions of the Plan. We also note the conclusion of negotiations with cities, resulting in an Amended and Re-stated Solid Waste Interlocal Agreement. A handful of cities (including the city of Bellevue) have declined to sign onto this new, longer term agreement, and have instead indicated that they will not be a part of the system after 2028. Based on all these factors, the environment within which we are planning for the future, long-term solid waste system has changed considerably since planning began. SCA would therefore like the Plan to be reviewed, and updated as appropriate, to reflect this changed environment.

The "King County Performance Audit of Solid Waste Transfer Station Capital Projects", completed in September 2011, identifies a number of issues and contains important recommendations that need to be implemented. In addition, the "Independent, Third Party Review of the Solid Waste Transfer and Waste Export Plan", completed in July 2007, notes important items to consider. The review of the Solid Waste Transfer and Management Plan should be informed by the recommendations and ideas contained in both of these documents, including the following items:

Update system tonnage projections and base these projections on solid waste tonnage from unincorporated King County and cities who have signed the Amended and Re-stated Solid Waste Interlocal Agreement and who have committed to participate in the regional solid waste system for the system long-term; Page 1 of 2



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- Review cash flows and revenue from within unincorporated King County and cities that have signed the
  Amended and Re-stated solid waste Interlocal Agreement and have committed to participate in the regional
  solid waste system for the system long-term. Such a review should also be included as updated financial
  policies will be developed in the latter half of 2013;
- Include cost as a transfer station evaluation criteria and conduct cost analysis for system configuration alternatives, including full cost per ton and facility-specific cost metrics;
- Evaluate costs for the full range of functionality at the transfer station system, including compaction costs per transfer station and cost to serve self-haulers at each transfer station;
- Evaluate transfer station system utilization by the time the transfer stations reach the end of their expected useful lives;
- Evaluate the 19 Evaluation Criteria for transfer stations, including adding, removing, or changing the criteria, and evaluate the outcome of potential changes to the criteria;
  - Specifically evaluate and review changes to Evaluation Criteria #1, "90 percent of the users of a facility to be within 30 minutes travel time" and evaluate different time thresholds, including between 30 - 40 minutes travel time
- Audit Recommendation #4, SWD should provide county policy-makers and regional partners systematic
  analysis of the incremental cost impacts of the number and capacities of the transfer stations, the
  functionalities of the stations, and an assessment of which project financing and delivery method is most
  likely to result in lower capital costs

In light of the considerable work conducted by the King County Auditor from their *Performance Audit of Solid Waste Transfer Station Capital Projects*, and ongoing work by the County Auditor's *Capital Project Oversight Program*, which includes oversight of the Factoria transfer station capital project, we recommend that the King County Auditor work with the Solid Waste Division to conduct this review of the solid waste system and the issues identified above.

Furthermore, the County may wish to consider re-engaging Gershman, Brickner and Bratton (GBB), who conducted the *Independent Third-Party Review of the Solid Waste Transfer and Waste Management Plan*, to provide independent recommendations for the optimal, cost-effective and efficient solid waste system to meet the needs of King County and its' partners for the next fifty years.

SCA looks forward to working with the County on this important and timely update to the *Solid Waste Transfer and Management Plan*. Thank you for your efforts on behalf of SCA, and your leadership as Chair of MSWAC.

Sincerely,

**Denis Law** 

President, Sound Cities Association

Mayor, City of Renton

Cc: SCA Board of Directors

SCA Public Issues Committee

Metropolitan Solid Waste Advisory Committee

Pat McLaughlin, Division Director, King County Solid Waste Division

Kevin Kiernan, Assistant Division Director, King County Solid Waste Division

Diane Yates, Intergovernmental Liaison, King County Solid Waste Division

Christie True, Director, Department of Natural Resources and Parks Director