



Armondo Pavone Mayor

August 6, 2020

Mr. Pat McLaughlin, Director
King County Solid Waste Division
201 South Jackson Street, Room 701
Seattle, WA 98104
Sent via Electronic Email

**RE: City of Renton Concerns with King County Solid Waste Division
Support Facilities Relocation Option 3**

Dear Mr. McLaughlin:

We are appreciative of the time and attention you devoted recently in coming before our Renton City Council Committee of the Whole (COW) on the Solid Waste Division's plans regarding the proposed relocation of the Support Facilities Center. However, we want to make you aware of very serious concerns we have with the proposed location of an 8-acre, county-owned parcel in the Highlands area, adjacent to the existing Renton Transfer Station (Option 3).

While we understand and support the need for an operational support facility, we have deep concerns we would like to note with the Renton Highlands site as the Solid Waste Division prepares to issue a Draft Environmental Impact Statement (DEIS) and determines whether it should include Option 3 within that DEIS. We have highlighted key concerns in this cover letter while, additionally, we have provided the attached technical memorandum with substantive concerns compiled and listed by staff in the city's Public Works and Community and Economic Development (CED) departments.

First, we have serious reservations about the viability of the site itself given surrounding land uses and the lack of a buffer. The Option 3 site is surrounded by residential land uses to both the east and west, as well as the Renton Technical College (RTC) facility just across NE 3rd/NE 4th streets. While other proposed Support Facilities being considered provide buffers of up to 500 feet from surrounding neighborhoods, the Option 3 site provides only a 90-100 foot buffer from the Liberty Ridge neighborhood.

Additionally, RTC has purchased additional property near the Option 3 site, meaning there will be even more students crossing a busy street that would have considerable truck traffic added to it. This would create a safety concern and is at odds with the vision and the considerable infrastructure investments Renton has made in this area to accommodate the growth of neighborhoods and the expansion of higher education facilities (RTC).

The hours of operation for the Support Facility are another potential concern. While we seek clarification, our understanding is that trucks could be running as early as 7:00 a.m. and as late as 10:00 p.m. That would create noise issues and would run afoul of statewide noise standards spelled out in the Washington Administrative Code (WAC).

On the water quality side, we believe it will be critical for the county to evaluate potential risks to the city's sole source groundwater aquifer, which supplies drinking water to tens of thousands of customers. This should include an evaluation of what hazardous materials will be stored, handled, treated, used or produced on-site, and the potential for those substances to degrade water quality.

We also have questions about the scoping process for this facility. The Option 3 site was not originally considered during the EIS scoping period that was completed in August 2019. Our community members were not made aware of the proposal until an initial June 24, 2020 mailer to residents and businesses in the Renton Highlands area. Subsequently, a larger facility with less screening and buffer space was proposed. Thus, there was inadequate and incomplete outreach to gather community input, including the potential for relocating the Support Facilities to other King County properties, or other available sites in the region. We would recommend the county do a much broader scoping and alternative siting process.

There is also a social justice and equity aspect to this DEIS process that we are compelled to note. The Renton Highlands neighborhood, where the Option 3 facility would be located, has 12% of its population living at or below the poverty line. Additionally, 41% of the residents are non-English speaking, 16% are Supplemental Nutritional Assistance Program (SNAP) funding recipients, and 10% are both over age 65 and at or below the poverty line.

Additionally, the City of Renton has been an accommodating host to not one, but two transfer stations that have served the region's solid waste disposal needs for many years including the King County Renton Transfer Station and the Republic Services Black River Transfer Station. Renton also hosts the South Wastewater Treatment Plant and associated sewer interceptors, which convey sewer from the southend and eastside of King County to the South Wastewater Treatment Plant. Additionally, Renton has been asked to host by far the largest De-Intensification Shelter in the county as COVID-19 emergency facilities have been stood up by the county.



While Renton remains supportive of the expansion of the landfill to meet the region's solid waste disposal needs, we believe the other two options for the location of support facilities on the landfill site are better alternatives. Both the North and South Facilities Options located at the Cedar Hills Regional Landfill appear to be viable and cost effective options that will better serve the operational needs at the Cedar Hills Landfill with the least impact to the environment, traffic, neighborhoods, and businesses.

We look forward to reviewing how you have addressed our concerns in the DEIS.

Thank you for your consideration.

Sincerely,



Armondo Pavone
Mayor
City of Renton



Ruth Pérez
President
Renton City Council



Valerie O'Halloran
Chair
City Council Utilities Committee

Attachments

cc: Dow Constantine, King County Executive
King County Councilmembers
Renton City Councilmembers
Christie True, King County Department of Natural Resources and Parks
Martin Pastucha, Public Works Administrator
Chip Vincent, Community and Economic Development Administrator
Ronald Straka, P.E., Utility Systems Director
Jennifer Henning, Planning Director
Jim Seitz, Transportation Director
Linda Knight, Solid Waste Coordinator

20-071



Technical Comments Compiled by City of Renton Public Works and Community & Economic Development Departments

1. Traffic Impacts

Option 3 will create a substantial number of additional heavy garbage trucks using the Renton Transfer Center (RTC) for storage and maintenance along with more vehicles for additional employees working at this site. A traffic impact analysis report according to City of Renton guidelines is needed, focusing on the roadway corridors accessing the RTC. The King County Solid Waste Division's traffic consultant, Transpo, has consulted with City of Renton Transportation Division staff regarding the city's issues and concerns with the potential traffic impacts resulting from the proposed expansion of RTC landfill support facilities. We have provided Transpo with turning movement counts and SYNCHRO traffic analysis software files for the selected intersections along the corridors to aid in their traffic analysis but have not yet seen the report.

As a result of this consultation, Transpo has prepared a memorandum, Cedar Hills Regional Landfill Transportation Analysis Methods and Assumptions dated April 16, 2020, to be used in addressing the city's concerns. A copy of the memorandum is attached.

The city has also been dealing with the existing trucks speeding along the arterial streets to and from the RTC site running the traffic signals along NE 3rd and NE 4th streets going up and down the hill and not wanting to stop on the steep hill grades. As a result, the arterial crash rates will likely increase due to the increased truck demand. A crash study must be performed for the additional number of heavy trucks for a comparison between existing and proposed conditions for the RTC truck operations.

2. Noise Impacts

a. Hours of Operation:

Surrounding and nearby properties include an established single-family residential development, a former gravel quarry that is being filled and is zoned for residential development, and a site owned by Renton Technical College that will be programmed for educational use. The EIS should analyze potential operational noise impacts of the facility on the surrounding land uses, including residential properties. Renton Municipal Code 8-7-2 adopts the Washington Administrative Code (WAC) Maximum Noise Regulations that limits maximum noise levels to receiving properties.

b. Truck movement noise on and off site, vibration:

The EIS should also provide an assessment of potential noise and vibration impacts on surrounding property as the result of large trucks frequenting the site. The number of trips, types of trucks and the likelihood of noise and vibration travelling from the facility to receiving properties should be evaluated.

3. Neighborhood Impacts

The Option 3 site lack of buffer with the adjacent Liberty Ridge residential neighborhood will increase the potential for noise, light and odor impacts to the neighborhood. The distance from the Option 3 site to the existing homes in the Liberty Ridge residential neighborhood is 90 to 100 feet. The Support Facilities options being considered at the landfill site (North Support Facilities Option 1 and South Support Facilities Option 2) provide a 500 foot buffer from existing residential properties that are developed at rural land use densities, much less than the existing R-10 land use density in the Liberty Ridge residential neighborhood.

4. Land Use

Surrounding properties include a mix of light industrial, detached single family residential, self-storage, county offices and shops and property proposed for expansion of Renton Technical College. Uses that generate noise, odor or vibration are not appropriate abutting or adjacent to residential land uses. The EIS should analyze the impact to less intensive land uses.

5. Social Justice:

The Renton Highlands neighborhood, where the proposed Renton support facilities option is located, has 12% of the population at or below the poverty line, 41% are non-English speaking residents, 16% receive SNAP assistance and 10% are over age 65 and are at or below the poverty line. The EIS Scoping process has not actively engaged these residents, who may lack the resources or ability to participate in the EIS Scoping process in a meaningful way, especially during the pandemic. Initial scoping did not include the Renton location as an alternative location for the facility, and the mailing accomplished to contact residents does not appear to have resulted in active participation.

6. Water Quality

a. Groundwater:

The site is located in Zone 2 of the city's sole source aquifer, which provides drinking water to Renton residents within the city's water service area (18,378 customer accounts). The Draft EIS needs to evaluate the risk to the aquifer due to the proposed use on the site, especially if hazardous materials will be stored, handled, treated, used or produced on the site and the potential for these substances to degrade groundwater quality (RMC 4-3-050G8bi). This includes any petroleum fuel tanks installed on the site [RMC 4-3-050G8bvi(a) to (c)].

b. Surface Water:

The development of the Option 3 site for use as the Support Facilities for the landfill will create a large amount of impervious surface with most of it being pollution generating impervious surface

for the parking lot area. Surface water impacts to quantity and quality of surface water runoff will need to be assessed in the draft EIS. How the on-site runoff will be managed, discharge location from the site and any potential downstream flooding or water quality problems should also be addressed in the EIS.

7. Air Quality and Odor

Odor and poor air quality may have negative impacts to the surrounding residential and business neighborhoods leading to increased dissatisfaction and complaints by citizens. An increase in truck trips to and from the site have potential for increased air pollutants from vehicle emissions. Short-term storage of loaded transfer trailers, as well as unsightly, odorous trucks passing through the neighborhood degrade the overall livability of the neighborhood. To this end, the city requests that the county assess the overall risk of odors to the surrounding community, and provide a description of strategies currently in use, as well as strategies proposed to mitigate any risk to the community.

8. Need for Evaluation of Other Off-site Support Facilities Locations

The proposed alternative Renton site for the Cedar Hills Regional Landfill (CHRLF) Facilities relocation was not originally considered during the scoping period completed in August 2019. As such, there was inadequate outreach to seek community input, including suggestions for relocating the CHRLF Support Facilities to other King County properties, or available sites in the region. For this reason, the city believes it is important for the county to provide their full evaluation of other off-site locations as well as broaden their consideration and evaluation to other regional sites, prior to inclusion in the Draft EIS.

9. Aesthetics

The subject site is located at a higher elevation than the abutting residential subdivision, and the potential project is likely to have visual quality impacts. Existing residences to the west are located within approximately 90 to 100 feet and there is no meaningful vegetative buffer that would diminish these impacts. The analysis should consider vegetative screening, setbacks or architectural design to reduce these impacts to the residents.