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Via Email (pat.mclaughlin@kingcounty.gov; northeast@kingcounty.gov)

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Date: April 9, 2024

RE: Friends of Sammamish Valley Response to Draft Environmental Impact Statement for the Northeast Recycling and Transfer Station

Dear Mr. McLaughlin and Ms. O'Hara:

I am writing on behalf of Friends of Sammamish Valley to provide comments in response to the King County Draft Environmental Impact Statement (DEIS) for the Northeast Recycling and Transfer Station (NERTS), dated February 2024.

Friends of Sammamish Valley is a Washington nonprofit corporation comprised of citizens, businesses, and organizations with the shared goals of protecting the Sammamish Valley Agricultural Production District (APD) and Sammamish Valley watershed, maintaining the character of the surrounding Rural Area, and preserving the rural lifestyle for local residents.

Many FoSV members reside and do business in areas that will be directly affected by the NERTS Alt 2 location. We have firsthand knowledge of negative impacts to the built and natural environment that will arise from the increased government and private waste hauler traffic coming from multiple directions traveling through the Sammamish Valley; the impacts of pollutants, dust, light, glare, traffic, and noise on the Sammamish Valley farm economy; the impacts to the fauna and watershed within the Valley; and impacts from any potential release of waste or hazardous materials that NERTS would handle, store and transport through the Sammamish Valley.

Although we are grateful that King County prepared a DEIS, we do not believe the primary functions of SEPA are fully met in the DEIS. Those functions are to: (1) Inform decision makers and the public of the environmental impacts that are likely to occur as the result of proposed governmental actions; (2) Identify and consider mitigation of those impacts; and (3) Identify and evaluate alternatives that would have lesser environmental impacts before action is taken on a proposal.

We are concerned about aspects of the candidate Woodinville/Sammamish Valley Alternative 2 site that the DEIS did not adequately cover, in particular:

- A complete EIS must include full analysis of impacts to the Sammamish Valley geographic area where the Alt 2 site is located. The site is less than ¼ mile from APD farmland and the Sammamish River. The Valley is a small, fragile, integrated environmental ecosystem that will be impacted by this proposal. Many aspects of those impacts were not included in the DEIS.
- The DEIS makes scant analysis of impacts from the Hazardous Waste Facility that will be located at the Alt 2 site. No total volume numbers are included. No discussion of impacts of government and private hauler vehicles traveling to and from the site through a sensitive valley ecosystem are included, nor possible impacts from an inevitable spill from the site or waste hauler vehicles. No mention is made of why the Alt 2 location would include a Hazardous Waste Facility, but the Alt 1 A and B alternatives do not. No mention is made to impacts on the existing Hazardous Waste Mobile program which operates county-wide and would need to continue operation regardless. The EIS must fully disclose all impacts related to the Alt 2 Hazardous Waste Facility.
- The DEIS fails to identify impacts to the Sammamish Valley farm economy, home to dozens of farms, many of which are female or BIPOC owned. Impacts from non-point source pollutants, dust, light, decreased pollinator success, traffic and many other issues both during construction and operation of the NERTS facility need analysis. The EIS must also consider impacts to local food security that may occur from negative impacts to Sammamish Valley farms which serve our local foodbanks, farmers markets and restaurants. The EIS must also consider impacts to nearby minority communities who rely on culturally relevant foods grown in the Sammamish Valley by farmers from their own communities.
- The Sammamish River, which is connected to the Alt 2 onsite wetland and stream, passes roughly 1,000 feet from the site. It is home to many native aquatic species and is the migration route for endangered salmon originating in many smaller natal streams in the watershed. The Sammamish River is already a designated 303(d) waterway with temperature, dissolved oxygen, and coliform levels that are dangerous to salmon and humans. Impacts from runoff from the new impervious surfaces that NERTS would require and the non-point source pollutants from waste hauling must be included in the EIS.
- The DEIS does not include impacts to the extensive avian population in the Sammamish Valley. Species include both migrating species and roosting species such as bald eagles, hawks, owls, ospreys and woodpeckers and pollinators such as hummingbirds. The EIS

must include impacts particularly from habitat loss, dust, light, glare, and noise, in addition to disease vector control on raptors.

- The Alt 2 Sammamish Valley site is mapped as a seismic hazard area, and the hillside above the site includes landslide and erosion hazard areas and abundant seepage, each of which increases the potential for hazardous discharges into the Sammamish River. The EIS must include a complete geologic cross-section.
- The full impacts of greenhouse gas emissions (GHG) must be calculated, both from the government (county/city) and private waste haulers traveling over 8 miles (each way) past Alternative 1A and 1B sites. Over 75% of the served population is closer to the Alternative 1A and B sites. The impacts of increased GHG emissions must also be considered in context of King County's Strategic Climate Action Plan (SCAP).
- The DEIS did not fully analyze all waste hauler routes, the difficult ingress/egress from the Alt 2 site, and the impacts additional waste hauler traffic will have on an already extremely congested area, including additional impacts of pollution from non-waste hauler vehicles idling due to waste hauler traffic.
- The DEIS did not fully analyze the impacts resulting from the Alt 2 location not being central to the service area, nor impacts from the fact that the Alt 2 location is removed from the bulk of the population within the service area.
- The DEIS did not disclose that an eminent domain process for acquiring land from at least one of the several property owners — who will be displaced at the Alt 2 location — will be likely. Costs to King County taxpayers, KC staff time, court time, and impacts on current business owners of those parcels must be included. The eminent domain process requires the County to demonstrate that the action is “for the general benefit or welfare of the county.” (RCW 8.08.130). The EIS must disclose how moving the NERTS facility from its current location (Alt 1A, 1B, or No Action) to the Alt 2 site would be beneficial and warrant an eminent domain process.
- The DEIS fails to fully disclose impacts on nearby entertainment venues within the City of Woodinville, where FoSV members and other citizens often sit outside near to the local roads to enjoy food and beverages or listen to music. Health impacts from waste hauler traffic on patrons of those venues must be considered.

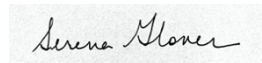
A primary function of an EIS is to ensure that decision makers and the public are informed of all the impacts to the built and natural environment that are likely to occur as the result of proposed governmental actions. King County's objectives for the new NERTS facility also include “to integrate safely into the host community”. As such, it is crucial that the Final EIS is carefully

scoped to reflect all impacts, not just those that are static and within a study area that is smaller than the real impacts of a project. The Alt 2 location lies within the Sammamish Valley and all impacts to the Valley must be considered.

In addition, although a comparison of impacts is made between each of the Alternative 1A, 1B and 2 sites with the No Action Alternative, the EIS must include a comparison between the proposed action Alternative sites. The EIS should include a full discussion of the comparison of, for example, the Alt 1A site to the Alt 2 site. It should also be noted that selection of the Alt 1 site has many benefits to the citizens of King County including: the cleanup of existing waste currently underneath the current transfer station, upgrading the existing landfill protections, decreased GHG emissions, and continuing to preserve and protect the Sammamish Valley APD and the Sammamish River watershed for the benefit of all King County citizens.

FoSV has asked Barbara Lau, an educator and environmental scientist, to comment on the DEIS of the NERTS Alternative 2 Sammamish Valley location. We have attached the response provided by Ms. Lau, which includes much more detail on the issues raised in this letter, as well as additional concerns. We hereby incorporate her analysis into the comments submitted by FoSV in response to the DEIS.

Sincerely,

A handwritten signature in cursive script that reads "Serena Glover". The signature is written in black ink on a light-colored, slightly textured background.

Serena Glover, ED,
Friends of Sammamish Valley
425-985-2992
GoFoSV.org

To: Serena Glover - Executive Director, Friends of Sammamish Valley
From: Barbara Lau
RE: Response to Draft EIS for King County NERTS Project
Date: April 9, 2024

In this letter I am providing, per your request, my comments on the King County Draft EIS for the NorthEast Transfer Station (NERTS). My education includes earning both a Bachelor and Masters degree in Geography, and an MBA from the University of California, Los Angeles, and PhD classwork at The University of Georgia, School of Forest Resources. My studies included a thesis on hydrology and erosion. I have completed course work and attained certification in climate change science from Cornell University.

My professional experience includes working in the position of Environmental Scientist with a major engineering firm where I prepared SEPA Checklists, Environmental Impact Statements, and other regulatory documents. My professional work experience also includes work as the Environmental Compliance Specialist/Permitting Coordinator for an environmental law firm where I prepared environmental compliance documents and led environmental consultant teams preparing expert testimony, regulatory compliance actions, and mitigation.

I have been active on a volunteer basis in multiple environmental and land use issues regionally and with a focus on the Sammamish Valley. I am writing to Friends of Sammamish Valley, a Washington nonprofit corporation, representing citizens, farmers, businesses, environmental groups, and other organizations with the shared values of preserving the viability of agriculture in the Sammamish Valley APD, protecting the hydrology, water quality and biology of the Sammamish Valley portion of the Sammamish Watershed, and preserving the character of the surrounding Rural Area. In this letter, I am providing comments on the Draft EIS for the NERTS facility, which was issued in February 2024.

The primary functions of SEPA and the Draft EIS are to:

- 1) Inform decision makers and the public of the environmental impacts that are likely to occur as the result of proposed governmental actions;**
- 2) Identify and consider mitigation of those impacts; and**
- 3) Identify and evaluate alternatives that would have lesser environmental impacts before action is taken on a proposal.**

The Draft EIS and review performed to date does not accomplish these required functions. Instead, the Draft EIS compares the No-Action proposal to each of the Alternatives 1A, 1B and 2 proposals. It does NOT compare the Alternative 1A and 1B AND the Alternative 2 proposals to each other. Without the comparison of the alternatives with each other, the last goal “to identify and evaluate alternatives that would have lesser environmental impacts before action is taken on a proposal” is not fully fulfilled in this Draft EIS.

Although three sites, in addition to the No-Action Alternative are reviewed in the Draft EIS, the unique location of the Alternative 2 site, which is comprised of six tax parcels in the 15000 block of Woodinville-Redmond Road NE in Woodinville, Washington within the Sammamish Valley

region, is not considered in the Draft EIS. This site is unique in that it lies within the Sammamish Valley.

The Alternative 2 (Alt 2) site lies just west (within ¼ mile of several parcels) of the northern portion of the Sammamish Valley Agricultural Production District (APD). This 1000-acre APD has been established since the 1970s when King County tax payers chose to protect the fertile valley through the Farmland Preservation Program leading to the establishment of this Agricultural Production District. The Sammamish Valley environment, including the APD as a region must be taken into consideration when examining the impacts of the proposed NERTS Alt 2 site. The NERTS Alt 2 location will cause impacts to the entire region, particularly to the farmers and farmlands of the APD, the wildlife corridor and the Sammamish River, with both its large runs of migrating salmonid species and habitat for avian, mammal and aquatic species.

The Sammamish Valley is a rare combination of natural resources and thriving wildlife, rich farmland, farmers and farm economy, and environmentally critical areas. These natural resources include a major avian migration corridor, the commercially significant APD farmland, and the Sammamish River, which is a major migration path for several endangered salmonid species. In addition, the valley road, Route 202 is considered a Scenic Byway, with both views of fields and Mt. Rainer in the view corridor. The valley also offers many recreational opportunities, including the very popular Burke-Gilman Trail and Eastrail. The meager disclosure of impacts of the NERTS facility Alt 2 site upon the Sammamish Valley environment, and the scant analysis of impacts and mitigation do not take into account the characteristics of the Sammamish Valley and do not recognize many of the impacts the NERTS facility would have upon the Sammamish Valley APD farm economy, the Sammamish River, and the region.

The NERTS building will be 80,000 to 125,000 square feet and up to 70 feet high approximately equivalent to the height of a 7-story building. The Alternative 2 (Alt. 2) Woodinville site includes truck holding lanes and BOTH a large enclosed transfer facility and a Hazardous Waste (MRW) collection and storage facility for: *pesticides, glues and adhesives, antifreeze, aerosols, automotive products, fuels, rechargeable batteries, button batteries, pool and spa chemicals, oil-based paints, hobby chemicals, mercury devices, thinners and solvents, fluorescent bulbs, toxic cleaning products, fuel cylinders (under five gallons), lithium batteries, and alkaline batteries*. The Alternative 1A and 1B Kirkland sites do NOT include the MRW site.

According to the Draft EIS, the King County Solid Waste Division (SWD)'s "objectives for the new NERTS facility includes:

- 1) Optimizing opportunities for the community to recycle;
- 2) Meeting modern service levels for capacity, convenience, and accessibility; and
- 3) Integrating safely into the host community."

None of these objectives, nor the primary functions of SEPA and the Draft EIS which are "to inform decision makers and the public of the environmental impacts that are likely to occur as the result of proposed governmental actions" are met in the Draft EIS examination of the NERTS facility at the Alternative 2 site, particularly without reviewing the impacts of the NERTS

Alt 2 site on the Sammamish Valley region and the impacts on the Sammamish Valley Agricultural Production District.

Impacts on the Sammamish Valley Agricultural Production District (APD) Farm Economy and Regional Food Security

Objective 3 for the new NERTS facility “Integrating safely into the host community” is not met without consideration of the Sammamish Valley Agricultural Production District. The Sammamish Valley APD is over 1000 acres of prime farmland, located north, east and south of the proposed NERTS Alt 2 site, with farmland located within ¼ mile from the NERTS Alt 2 site.

The Sammamish Valley APD is home to many farms producing high quality local food. Many of these farms practice regenerative agriculture, which is highly dependent on a clean environmental ecosystem. Farms are located throughout the Sammamish Valley bottom, north, south, and east of the proposed NERTS site. The impact of the NERTS Alt 2 facility site to farm operations, farmland soils and surface waters throughout the valley must be evaluated in the EIS.

Sammamish Valley farmers produce fresh, high quality, local produce on the incredibly fertile soils. The Valley is considered to be one of the most fertile agricultural valleys in the country. Studies have shown the Sammamish Valley APD has the capacity to feed 80,000 people fresh vegetables using intensive organic growing methods with farm yields over 10 tons of high-quality produce grown per acre, approximately 3 times the USDA average.

1) The EIS must reevaluate the potential impacts of non-point source pollution on the valley and APD including flow into the Sammamish River from overland and surface flow, especially when some farms have riparian water rights and/or local groundwater wells to use on crops for human consumption. The Draft EIS list standard BMPs to contain flows to the site’s wetland and unnamed tributary to the Sammamish River which may require additional secondary containment. Contamination and containment from potential spills of MWR and other wastes, wastes spilled from truck holding lanes, nonpoint pollution generated from the trash hauler trucks during the transfer process, pesticide release from the rodent bait traps, and/or the facility’s wash and cleaning process should be fully evaluated for impacts to the APD water resources. The draft states “**there is potential for minor impacts to vegetation, fish, and wildlife from contaminated stormwater runoff during operation of the facility.**” This risk must be evaluated to include the APD.

2) The EIS must evaluate impacts of emissions of dust, odors, light and other pollutants on the Sammamish Valley APD native environment, from microbial life in the soils to wildlife such as insects, gophers, reptiles, amphibians, and birds - all critical to the success of nearby Valley farms practicing regenerative agriculture. These farms rely on a healthy natural environment for business success. The impacts of emissions must be evaluated both during construction and during operation. The Draft EIS omits these impacts.

3) The EIS must evaluate the impacts of light and glare on APD crops. Crops need dark to grow properly and keystone species needed in a regenerative agriculture ecosystem require

nighttime darkness.

4) Farmers heavily rely on pollinators throughout the valley to pollinate their crops. Air quality impacts from aerial emissions of dust, odors and pollutants must be evaluated on farms use of pollinators such as honey and mason bees, in addition to other native insect and hummingbird species to pollinate crops. The EIS must evaluate the impacts of both construction and operations to these important required pollinators. The Draft EIS omits these impacts.

5) The primary route through the valley APD is State Route (SR) 202, a two-lane minor north-south trending arterial. Large King County waste haulers, hazardous waste haulers and private/city waste haulers will travel through the Sammamish Valley on SR 202. Fields growing organic foods are located throughout the APD along SR 202. The Draft EIS omits the following impacts which the EIS must include regarding impacts of waste hauling traffic and onsite NERTS related pollution on the Sammamish Valley Agricultural Production District (APD):

- The EIS must include indirect pollution from waste haulers' truck tires and brake pads including Cadmium, 6PPD (and derivative 6PPD-q which is deadly to Coho salmon), oil drips, antifreeze which are being deposited on NE 124th St, SR 202, NE 145th St and other local roads. The EIS must also consider lost/leaking debris from waste loads in Redmond, Woodinville, and along routes through the Sammamish Valley APD farmland. These toxins poison the soil, surface water and streams running into the fields and to Sammamish River. This direct impact from the waste haulers must be combined with the added traffic delays that will occur to other drivers, creating an even greater amount of pollution.
- The EIS must consider waste hauler traffic impacts (1,000 trips per day) to farmers and farm workers who must egress to/from their fields onto SR 202. This will be more difficult and dangerous, especially for the farmers when driving slow farming implements. Traffic through the valley already impedes farmers during morning and evening rush hours. The additional traffic by private parties and waste haulers will decrease farm accessibility.
- The Alt 2 site decreases safety, convenience and accessibility to farms for both the farmers, their suppliers, AND their customers, by creating additional traffic and traffic accident risk, especially when turning left into/out of the APD farms.
- The EIS must consider the impact of nearly 62,000 households privately transporting hazardous wastes through the APD via SR 202, instead of transporting them to local Hazardous Waste Mobile sites.
- The EIS must consider the impacts of additional Greenhouse Gas Emissions (GHG) on the farms and farm production and farmers and field workers in the APD, especially during times when temperature inversions can trap these pollutants close to the valley surface.

6) The EIS must consider crop losses and economic losses to farmers - from reduced farming success due to conflicts generated from pollution, GHG emissions, noise, glare, impacts to pollinators and other keystone species for regenerative farming success, and increased traffic.

7) The EIS must consider impacts to local food banks and regional food security from reduced farming success in the Sammamish Valley due to conflicts generated from pollution, GHG emissions, noise, glare, impacts to pollinators and other keystone species for regenerative farming success, and increased traffic.

8) The majority of farmers in the Sammamish Valley are BIPOC or female. Most of these farmers live in Seattle within their cultural communities and farm in the nearest APD to where they live. The EIS must consider the impacts the Alt 2 site will disproportionately have on minority communities.

Clearly the Alt 2 site fails to BOTH meet modern service levels for capacity, convenience, and accessibility and integrate safely into the host community, when the host community is both the city of Woodinville AND the Sammamish Valley farmers and farms located in the APD.

SPECIFIC RESPONSES TO DRAFT EIS ENVIRONMENTAL IMPACTS

The below comments are directly concerning the DRAFT EIS, primarily focused on the analysis of the Alt 2 site in each of the following sections. The EIS must evaluate and include the following impacts:

Section 3.1 Earth

The EIS must include a geologic cross-section including hydrology for the site and the site perimeter. The Draft EIS Figure 3.1-7 “Seismic Hazards in the Vicinity of Action Alternatives” clearly shows the Alt. 2 site is within the Southern Whidbey Island Fault Zone, with the site located between two N-S trending fault lines in a moderate liquefaction susceptibility zone. The geology and surface features of the Sammamish Valley include seismic hazards, landslide and erosion hazards, debris slides and a steep sloped valley side above the Alt. 2 site. Studies have shown that *the adjacent area west of the site within the study area, consists of a steep, unstable slope with numerous groundwater seeps*. In addition, several housing developments sit directly atop of the steep vegetated slope. The anticipated cut of 62,000 cubic yards on the toe of slope with known conditions of instability, groundwater seeps, and landslide and erosion hazards is not insignificant and could undermine slope stability.

Additionally, the groundwater table at the Alt. 2 site was not defined in the Draft EIS, although it was found to be at 8 feet below ground surface (BGS) nearby. Susceptibility to liquefaction during a seismic event must be included in the EIS if water accumulates at or closer to the surface of the site, particularly once the facility construction is completed.

The lack of a geologic cross-section for the Alt. 2 indicates these hazards were not fully defined, and the impacts were not fully considered. This location is far less geologically stable than the Alternative 1A and 1B site as per the figures and geologic cross-sections for Alternative 1A and 1B found in the DRAFT EIS. Thus, although some mitigation measures such as a retaining wall are discussed, they cannot be determined as adequate and the risk insignificant. The EIS must further evaluate the geologic hazards and groundwater conditions, including a potential as-built scenario, with the removal of 62,000 cubic yards of soil.

Section 3.2 Air

The Alternative 2 site does NOT align with King County's Climate Greenhouse Gas emission reduction goals stated as:

“The new Carbon Neutral Implementation Plan recommends that King County's 2020 Strategic Climate Action Plan (SCAP) establish new stronger goals for government operations to reduce greenhouse gas (GHG) emissions by 25% by 2020, 50% by 2025 and 80% by 2030.”

The Draft EIS is incomplete in its analysis of Air Quality impacts for the Alt. 2 site. The EIS must evaluate and quantify the following impacts:

1) The Draft EIS describes the GHG impact solely for the large King County waste haulers which take compacted waste from the transfer station to the Cedar Hills Regional Landfill. The Woodinville site is located 29 miles from the Cedar Hills Regional Landfill (CHRLF), whereas the Alternative 1 site in Kirkland is located 22 miles from the CHRLF.

When compared to the Alt.1 site, the Alt. 2 site creates an **extra 16 mile round trip** for King County waste haulers from the Alt 2 Woodinville site to the Cedar Hills Regional Landfill. *The Draft EIS does NOT quantify how much more GHG pollution would be generated by the large transfer truck waste haulers traveling the extra 16 miles to the Cedar Hills Regional Landfill, just that it would be approximately the same as the No Action Alternative.*

A comparison of the amount of GHG emissions relative to Alt. 1 must be included in the EIS; estimated GHG emissions are not calculated for any of the alternatives. Using the Draft EIS's underestimates, the Alt. 2 site would require an additional 154,000 gallons of fuel for King County haulers between years 2029-2040. This is due to the additional 8.5 miles distance one-way to the Alt 2 site vs the Alt 1 Houghton sites from the Cedar Hills landfill. No mention is also made that taxpayers would also foot the bill for the labor time, additional truck maintenance and the fuel. The EIS must include the GHG calculations for fuel and provide a quantifiable comparative analysis.

2) The Draft EIS does not calculate or consider the additional GHG emissions from the extra miles and travel time on 2-lane regional roads the private/city waste haulers will incur because of the extra travel from most of the service area population to the Alt. 2 site which is north of the high growth population centers.

Close to 75% of the households for the NERTS service area are in the southern half of the NERTS service area, closer to the Alt. 1 site. Kirkland, Redmond, and Sammamish total 232,900 people, while Kenmore, Woodinville, and Bothell total 85,167 people - a difference of 147,800 people, or 61,550 households (based on current Google data). Thus, garbage and hazardous waste from an extra 61,500 households must be transported additional miles from the southeast and south to the Alt 2 site, much of which traverse the shortest path to the site through the heart of the Sammamish Valley.

The EIS must evaluate the impacts of additional GHG emissions caused by the location of the Alt 2 site which is neither centrally located, nor located nearer to most of the service area population, especially when 75% of these households are much nearer to the Alt. 1A and Alt 1B location. Additionally the Draft does not evaluate air emission for waste transport from the future growth in these major population areas, as opposed to the northern portion of the service area. As growth continues in these areas, a greater percentage of waste will come from Redmond, Kirkland and Sammamish. The EIS must include the GHG calculations for these emissions and provide a quantifiable comparative analysis with other alternatives.

3) The Draft EIS does not calculate or consider the GHG emissions from additional specialized King County hazardous waste haulers trips carrying MWR loads to/from the Alt. 2 site. Nor is there any discussion of the potential for air quality degradation from VOCs from MRW transfer and storage. The EIS must include the GHG calculations for Hazardous Waste haulers and provide a quantifiable comparative analysis.

4) The Draft EIS fails to include local Sammamish Valley topography and subsequent local air quality inversions which occur in the valley in its discussion of odors, GHG emissions, dust and other air pollution. The Sammamish Valley air inversions must be included in the discussion of air quality impacts on local valley air quality in the EIS.

Section 3.3 Water

The Draft EIS is inadequate in its description the surface waters located in the study area of the Alt. 2 site and the potential for impacts to the surface water. The Sammamish River lies within ¼ mile of the Alt 2 site. As an inventoried shoreline of the state, Sammamish River is a Type S water per KCC 21A.24.355. The Draft does not include that the Sammamish River and its watershed has been the subject of numerous very costly environmental studies, engineered improvements and activities to improve the water quality of this important salmonid bearing river. Many of these studies and improvements have been funded by King County taxpayers.

Most recently the King County completed the Derby Creek Flood Reduction and Habitat Enhancement Project located at its confluence with the Sammamish River less than 2500 feet upstream from the confluence of the site's unnamed tributary and the Sammamish River. One mile downstream from Alt 2 is confluence of the Sammamish River with Little Bear Creek. This creek and its tributary, Cutthroat Creek, have been improved for water quality and Coho salmon recovery Snohomish County. Numerous other improvements have occurred throughout the Sammamish River watershed to improve both water quality and fish populations including the restoration of Gold Creek's estuary, located 1500 feet upstream from the Alt 2 site's unnamed tributary. It provides access to 1/4 mile of perennial habitat and cool fresh water following to the Sammamish River for migrating fish. The EIS must include a thorough description of the Sammamish River watershed, and its importance to the region. The water must be kept clean and cool to sustain these resources both for citizens and wildlife. Specifically, the EIS must include evaluation and impacts as follows:

1) The Draft EIS states "there is potential for minor impacts to vegetation, fish, and wildlife from contaminated stormwater runoff during operation of the facility." Any potential impact,

particularly from increased impervious surface area, surface water pollutants and overland flow from the driveways and vehicle holding areas must be critically evaluated especially those which endanger the surface waters, stream and the Sammamish River and surrounding APD. These impacts may occur particularly during high precipitation events, which are likely to overwhelm the stormwater management system. Excess flow could directly harm critically endangered species and their habitats.

2) Additionally, the Alt. 2 is the only alternative which includes an MRW facility. The Draft EIS Chapter 3 disregards the MRW facility at the Alt 2 site and does not include additional information as to protection of surface waters or ground waters from sorting, storing or transporting of hazardous wastes to and from the site. It does not include the major impacts which could occur if the MRW facilities were to spill waste and impact to surface flow or to the onsite wetland and stream which are directly connected to the Sammamish River. The EIS must include impacts of MWR contamination to groundwater when the groundwater has been established at about 8 feet below ground surface (BGS) near the site.

3) Figure 3.3-5. Action Alternative 2 Site Project Conditions of the Draft EIS illustrates the Alternative 2 site with the possible locations of the development of the NERTS facilities. Elsewhere the Draft EIS states “The site for Alternative 2 is 12.9 acres, with an area available for development of about eight to 11 acres.” These two portions of the Draft EIS do not align. Figure 3.3-5 clearly illustrates the stream and a wetland with the standard 105’ buffer located on the majority of the southern portion of the Alt 2 site. In numerous locations throughout the draft, the development plan is stated as 9 acres, however, Figure 3.3-5 illustrates the developable portion of the site is less than 9 acres due to the wetland and surface water features. As stated in the Draft EIS report, a wetland delineation report needs to be conducted, however, this needs to be conducted before the Final EIS is prepared, and results included determining if the site is suitable for this large scale development and impervious surface area.

4) The Draft EIS states “The Alternative 2 site is not within a critical aquifer recharge area, with the closest a Category 2 CARA approximately 0.27 miles to the east on the opposite side of the Sammamish River (King County 2003). Category 2 CARAs are areas that provide recharge effects to aquifers that are currently or potentially will become potable water supplies and are vulnerable to contamination based on the type of land use activity.” As noted in comments for section 3.1, a geologic cross section was not prepared for the Alt 2 site. The Sammamish Valley has a known CARA type 2 aquifer, which is highly susceptible to groundwater contamination mapped throughout the region. Using King County IMAP, the CARA is located within the 1,000 feet of the north corner of the parcels. Whether mapped as part of the CARA or not, the groundwater seeps from the western valley slope above the site, contribute to the Sammamish Valley CARA aquifer. The EIS must include a complete assessment of groundwater and the aquifer in the Sammamish Valley, including impacts to the Sammamish Valley APD.

5) Finally, with the nearby groundwater setting at 8 feet BGS, the EIS must have a thorough evaluation of the impacts of construction dewatering on groundwater AND its impacts on the local surface water which includes the Sammamish River. The draft EIS includes no discussion of flow of cold groundwater into the Sammamish River, which has been documented by several studies. The EIS must include impact and timing of construction dewatering, which may be

limited to times when groundwater flow to the Sammamish River is not impacted, thus maintaining cold groundwater flows, water quality and water temperature required to sustain the salmon populations within the river.

Section 3.4 Hazardous Material

The Alt. 2 site is the only alternative which includes the MRW facility. The Draft EIS is deceptive in stating MRW acceptance practices, rather than stating total size and quantity of hazardous wastes to be stored at the facility. The EIS must thoroughly analyze the need and impacts for the MRW facility at the Alt. 2 site. The EIS must include any special precautions needed for sorting, storing, or transporting of hazardous wastes to and from the site. No information is being given as to why an MRW facility is included at the Alt 2 site, but not in the Alt 1A or 1B alternatives. The EIS must also include why the MRW facilities would be needed at the Alt 2 site, but not needed if Alt 1A or 1B were the chosen alternative. Additionally, the facility capacity for toxic materials to be collected and stored, or size of the MRW facility are not described in the Draft EIS, instead MRW is described based upon individual disposal load, NOT total quantity to be on site. The EIS must include the impacts of the size of the MRW facility and storage capacity of specific toxics proposed at the Alt 2 site.

The Draft EIS does not include impacts to populations now served by the traveling Hazardous Waste Mobiles currently rotating throughout the service area. Including a MRW facility at the Alt 2 site defeats Objective 1) “Optimizing opportunities for the community to recycle” and Objective 2) Meeting modern service levels for capacity, convenience, and accessibility. It is much easier, convenient, and accessible for public to continue to use local Hazardous Waste Mobiles for hazardous wastes. Hazardous Waste Mobiles travel regularly to numerous local destinations within the service area, especially when 75% of the population served by the NERTS service area is located south of the Alt 2 site. The EIS must include an analysis of using the existing Hazardous Waste Mobiles versus the Alt 2 site. This analysis must include the potential for hazardous waste spills by citizens incorrectly handling/hauling their hazardous waste through the Sammamish Valley — next to commercially significant APD farmland and a watershed carrying endangered salmonids — to the Alt 2 site.

2) The Draft EIS includes no description of the removal and transport of collected hazardous wastes from the Alt 2 site. The EIS must include a description of techniques and associated risks with loading and the removal of collected hazardous wastes from the site. These risks and impacts must include the transport risks and spill responses to be put in place and evaluate the risks of hazardous waste haulers traveling to/from the Alt 2 site, especially when these wastes must be transported over the salmonid bearing Sammamish River, next to APD farmland, as well as through congested downtown Woodinville intersections. Risk and impacts from a possible leak during the transfer process or traffic accidents involving hazardous waste haulers must be included in the EIS.

3) The EIS must also include an assessment of the hazardous wastes, landfill gases, leachate and other ongoing concerns associated with the historical landfill at the Houghton site, which will

NOT be improved if the Alt 2 site is selected. Both the Kirkland site Alt 1A AND 1B sites will still be contaminated land fill and subject to toxics and land fill gas from its historical use even if the Alt 2 site is selected. The Draft EIS states:

“A beneficial direct impact of Alternative 1A would be that refuse would be removed for off-site disposal. The proposed transfer station building would be built by excavating and removing refuse down to native soil and then filling the excavation with clean, compacted soil. This would include removing refuse beneath the existing transfer station, which is a portion of the site that has no landfill gas collection system. As a result, the total mass of refuse at the site would be reduced, less landfill gas would be generated, and local groundwater quality could be improved. In addition, the environmental controls in the areas adjacent to the redevelopment would be improved by installing a more robust landfill gas collection system, leachate collection system, stormwater management system, and cover system.” AND

“Direct impacts from construction would be similar to Alternative 1A, but based on the location closer to the center of the landfill where waste depths are generally deeper, potentially more refuse would require excavation for off-site disposal under Alternative 1B.”

One of the primary functions of SEPA states: “Identify and evaluate alternatives that would have lesser environmental impacts before action is taken on a proposal”. Clearly removing existing hazardous wastes from the Alternative 1 sites meets this objective, whereas the MRW facility proposed at the Alt 2 site creates risks and impacts.

Section 3.5 Wetlands

The Draft EIS does not include an analysis of impacts to the significant wetlands just east of the former railroad bed along the east margin of the Alt. 2 properties. These wetlands include a large pond, several streams and a significant marshy area of groundwater and surface water seeps (Figure 3.5-2). The pond is approximately 400 feet long and is less than 200 feet from the eastern property boundaries of several of the Alt 2 parcels. This pond and the streams feeding it from the wooded hillside, including the surficial groundwater seeping under the former rail line and into the southern portion of the Alt 2 site will all be impacted by the constriction of the Alt 2 building, especially when considering the removal of 62,000 cubic yards of material at the toe of the slope. Historical photos appear to show a small fan or wash from this area across much of these wetlands in the southern Alt 2 site parcels.

A wetland delineation of these water resources must be included in the EIS, along with the onsite wetland delineation and hydrologic cross-section illustrating substrate and groundwater hydrology. The EIS must evaluate the impacts to wetlands above (east) of the facility if earth stabilization (such as a retaining wall) is required as per Section 3.1.

The Draft EIS states ““There is a wetland on the Alternative 2 site and a stream directly adjacent to the site. While BMPs, including the new stormwater management system, are expected to

minimize risk to fish and wildlife habitat, there is potential for minor impacts to vegetation, fish, and wildlife from contaminated stormwater runoff during operation of the facility.” And “Temporary disturbances to wetland or buffer vegetation could result from project construction access routes and staging areas. The project design team may also find it is impossible to accomplish project goals without some impacts to the wetland, whether it be during construction or operation” The draft states both “No mitigation required” AND “If the project is unable to entirely avoid impacts to the wetland or its buffer, mitigation will be required.”

I disagree with the statement “No Mitigation Required” for impacts to wetlands. The EIS must evaluate this contamination risk to the onsite wetland and its connected stream and the Sammamish River. Furthermore, the habitat contamination must be evaluated as a risk for the Sammamish River. More detail is presented in comments for Section 3.6.

Section 3.6 Vegetation, Fish, and Wildlife

The Draft EIS states “Short-term construction activities that produce noise could cause temporary disturbance and/or dispersal of wildlife away from the site, but impacts are expected to be negligible.” And “*there is potential for minor impacts to vegetation, fish, and wildlife from contaminated stormwater runoff during operation of the facility.* “

The Draft EIS does not acknowledge the multiple studies and wildlife assessments performed on species located near the site and throughout the Sammamish Valley environment. The EIS must contain a thorough assessment of the many species located on or near the Alt 2 site and in the surrounding Sammamish Valley, and the impacts of both construction and operations on these species. The size and height of the building (70 feet) must be assessed when considering the impacts to the species on site, those migrating through the valley, and those living in the forested hillside directly above the site.

Many of the species are likely to use the undeveloped portion of the Alt 2 site which contains food, shelter and water for nesting and grazing animals, and an open corridor from the forested habitat above the site to the Sammamish River. The Draft EIS does not thoroughly assess impacts to aquatic species which will be impacted by release of contaminated surface water from the Alt 2 site which will flow to the wetland, unnamed stream, and the Sammamish River, which is within ¼ mile of the site. The EIS did not include any avian species or impacts when the Sammamish Valley is a known flight corridor from either construction or operation of the Alt 2 site. The Draft EIS does not assess the forested hillside habitat bordering the western side of the Alt. 2 site.

The EIS must evaluate and assess impacts to habitats and the species located within the Sammamish Valley habitat:

1) The Alt 2 site is bordered by a stream flowing directly into the Sammamish River, a major migration river for endangered Salmonid species, in addition to home to multiple other aquatic species including cutthroat trout and bass. Other native species likely to be present include longfin smelt, northern pikeminnow, peamouth chub, three-spine stickleback, largescale sucker, longnose dace, brook lamprey, and several species of sculpin. The EIS must include impacts to these native non-migrating species from contaminated stormwater runoff during both construction and during operation. The EIS must also include potential impacts associated with possible release of MRW contamination into the stormwater runoff.

2) The Sammamish River is a major migratory route for multiple salmon runs, including those from the Issaquah Hatchery, Bear Creek, Evans Creek, Idyllwild Creek, and numerous contributing watersheds in WRIA 8. The river carries vast numbers of endangered salmon, migrating to natal streams and the Issaquah Hatchery. Studies show the Issaquah Hatchery captured over 16,000 returning salmon in 2023-24. These counts do not include salmonids swimming the Sammamish River to/from natal streams in the Little Bear Creek watershed, Bear Creek watershed, Idyllwild Creek, Evans Creek, and other natal streams flowing into the Sammamish River and Lake Sammamish. Both in Washington state and King County salmon habitat and recovery are a major priority, paid for by taxpayers. The EIS must include impacts to these species from possible contamination.

3) Any impact of contamination from hazardous waste, dust or from the additional truck emissions, drips, antifreeze, or tires, especially from 6PPD-quinone, must be included in the EIS for the Alt 2 site because of the connection of overland and surface flow from the truck holding areas and transfer station, through to the wetland and stream directly into the Sammamish River habitat. Because the salmon are a keystone species, and Coho salmon are especially vulnerable to 6PPD-quinone, the increased risk and impact for contamination from the 1000 truck trips conservatively estimated to be generated daily must be included in the EIS. Additionally, the salmon are the critical food source to the endangered Southern Resident Orca, thus risks to these populations must be assessed and all potential risk of contamination of aquatic resources must be evaluated. Although standard BMPs will be in place to prevent leaks and spills from reaching these water bodies, leaks and spill are inevitable as per the Draft EIS “there is potential for minor impacts to vegetation, fish, and wildlife from contaminated stormwater runoff during operation of the facility.” Because this portion of the Draft EIS doesn’t include the MRW waste facility at the Alt 2 location, these risks need to be reevaluated with impacts.

5) The Draft EIS included NO documentation of the bird species that use the Sammamish River Valley as both a home and as a migration pathway. Multiple studies have documented over 83 bird species in the vicinity, including the ducks, Ospreys, Bald Eagle, Red-tailed Hawk, Marsh Wrens, and Blue and Green Herons. Additional species include European starlings, American crows, dark-eyed juncos, spotted towhees, house finches, house sparrows, and black-capped chickadees. Many of these species are present in the Sammamish Valley region year-round. Snags in the wooded hillside above the Alt 2 site show evidence of Pileated Woodpeckers near

the Alt 2 site. Impacts to avian species must be in the EIS. The mixed species forest above the site is prime eagle, hawk, woodpecker and owl habitat. The EIS must address impacts from encroachment (because of the size and height of the transfer station building in their habitat), light, and dust and noise impacts to successful rearing capabilities.

6) The Draft EIS does not include impacts to raptor species such as hawks, owls, osprey, and bald eagles, which are located throughout the Alt 2 area from disease vector control. The Draft EIS states “MSW can attract animals, including insects, rodents, and birds that are potential disease vectors.” AND “Best management practices currently employed to control vectors at other King County stations would continue or be enhanced.”

The residents of the neighboring Hawthorne Condominiums report seeing a bald eagle frequently soaring above their homes. The raptors, especially the bald eagle, hawks and owls are at risk of poisoning through disease vector control. These raptors eat mice, rats, voles, and other small animals and risk poisoning by eating poisoned small animals. This poisoning risk includes both by wastes deposited onsite and risks associated with bait traps. These risks must be evaluated in the EIS when disease vector reduction from bait traps is described in the Draft EIS for the increased rodent/disease vector populations expected to occur with the development of the NERTS facility.

7) The Sammamish Valley is a segment of the Pacific Flyway. Thousands of birds use the Sammamish Valley as a flight corridor to eat and rest twice annually on their migrations. The undeveloped portion of the Alt 2 site may be used by these migrating flocks. Impacts to these species from increased light, noise, dust, impervious surface area and traffic, and decreasing grassland habitat surrounding the wetland and water quality must be included in the EIS.

8) The EIS must assess impacts to the many mammalian species (including a significant black-tailed deer herd, rabbits, bats, gophers, coyotes, and beavers), and insect and reptilian species, which flourish in the rural valley and the forested uplands surrounding the Alt 2 site. All could be displaced by dust, odors, noise, and removal of the current vacant land which is located adjacent to a forested upland location. This vacant land provides habitat near the wetland and stream, and an open corridor to connecting to the valley.

9) The Sammamish Valley is an important pollinator pathway. A pollinator pathway is a continuous corridor of native, pesticide-free plantings that provide habitat and food sources for bees, butterflies, hummingbirds, and other pollinators. Farmers use pollinators throughout the valley to pollinate their crops. The EIS must evaluate the impacts of both construction and operations to these important pollinators.

Section 3.7 Energy

The Draft EIS States:

“Alternative 1A (and 1B) would use approximately 56,000 gallons of fuel in 2040 to transport materials to and bring empty trailers back from CHRLF, 70 percent of the estimated 77,000 gallons per year used under the No Action Alternative (assuming 66 weekday trips and 18 weekend trips each week).” AND

“Alternative 2 would use approximately 70,000 gallons of fuel in 2040 to transport materials to and bring empty trailers back from CHRLF, about 90 percent of the estimated 77,000 gallons per year used under the No Action Alternative (assuming 66 weekday trips and 18 weekend trips each week).”

The EIS must include impacts deficiently described in the Draft EIS:

1) The Draft EIS underestimates the fuel that would be required by King County to transport wastes. The Draft EIS analysis states Alt. 2 would use 14,000 more gallons of fuel as compared to Alt 1B. However, this calculation is ONLY for the large King County Waste Haulers transporting to/from CHRLF. The draft estimated the same number of trips for both sites. It does NOT include additional trips/fuel required for hauling additional loads of hazardous materials from the Alt. 2 transfer station site. It also does not include the extra fuel used by the city/private haulers which would travel further from most of the service area (Redmond/Kirkland) as compared to the Alt 1 (A and B) Houghton locations. The EIS must include an accurate fuel estimate for the Alt 2 site.

Even with Draft EIS’s underestimated fuel consumption, the Alt. 2 location would require an additional 154,000 gallons of fuel for King County waste haulers between years 2029-2040. The fuel is required to travel the additional 8.5 miles distance past the Alt 1 (Houghton) sites between the Alt 2 Woodinville site to and from the Cedar Hills Regional landfill. Taxpayers would foot the bill for the labor time, additional truck maintenance and the fuel.

2) The Draft EIS does not calculate or consider the additional fuel required to travel the extra miles and travel time on 2-lane regional roads the private/city waste haulers will incur as a result of the extra travel from most of the service area population to the Alt. 2 site which is north of the high growth population centers.

3) Most households for the NERTS service area are in the southern half of the NERTS service area. Kirkland, Redmond, and Sammamish total 232,900 people, while Kenmore, Woodinville, and Bothell total 85,167 people - a difference of 147,800 people, or 61,550 households (based on current Google data). Thus, garbage, yard waste, recycling, and hazardous waste from an extra 61,500 households must be transported 8 to 12 additional miles from the southeast and south to the Alt 2 site, likely through the Sammamish Valley. The EIS must consider impacts to the additional fuel consumption required by these waste haulers to the Alt 2 site which is neither centrally located, nor located nearer to most of the service area population, especially when these households are much nearer to the Alt. 1A and Alt 1B location.

3) The Draft EIS does not evaluate the extra mileage residents will be required to travel and associated fuel costs, to dispose of hazardous wastes if the Alt.2 location is selected AND if the local convenient traveling hazardous waste mobiles are discontinued.

Section 3.8 Environmental Health

The Draft EIS states:

“Washington State regulates more than 430 toxic air pollutants from commercial and industrial sources, including the 21 HAPs emitted by mobile sources. On-road mobile sources include automobiles and light-duty and heavy-duty trucks used for employee commutes and material transport. Non-road sources include various types of construction equipment. On-road and non-road mobile sources emit air toxics that are included in EPA’s list of HAPs and Washington State toxic air pollutants that can cause cancer and other health risk.”

The EIS must include impacts of these toxic air pollutants from increased waste hauler trucks traffic to the farmers and farm workers in the nearby APD. These workers are outside all day and are subject to air pollutants especially when temperature inversions occur within the valley.

Section 3.8 of the Draft EIS states: “The Alternative 1 site in Kirkland is located 22 miles from the CHRLF. The Alternative 2 site in Woodinville is located 29 miles from Cedar Hills Landfill. Therefore, the trip distance for the Alternative 2 site is approximately a third more than the trip distance for the Alternative 1 site. *The increase in distance would negate the reductions in vehicle miles with the installation of a compactor compared with Alternative 1* and would be approximately the same in vehicle miles travel compared with the No Action Alternative.”

This analysis is incorrect, in that a compactor will be installed at in all three action alternatives as per Draft EIS Section 2.2.2 Elements of Design and Construction. Therefore, trip distance for the Alt 1 sites are less than those for the Alt 2 sites. The EIS must correct this analysis.

Section 3.9 Land and Shoreline Use

Although the Draft EIS states the permits and steps required to secure the Alt 2 site, the impact of taking properties from existing land holders potentially through eminent domain can be an expensive and adverse to community values. Land use permits for such a large building with a height of 70 feet, may not meet the Woodinville land use codes. The impact and cost of buying these properties, including if adverse possession is required, must be included in the EIS, especially when King County already owns the property at the Alt 1 sites. King County taxpayer dollars could be spent in more beneficial ways than adverse property acquisitions.

Section 3.10 Noise

Most comments about noise are included in comments for Sections 3.6 Vegetation, Fish and Wildlife and Section 3.11 Aesthetics, Light and Glare. Many of those impacted by light and glare issues will also be impacted by noise issues, including both human and animal species. The noise issues include both city/private waste hauler noises from driving, braking, reversing, and dumping loads while maneuvering through both the holding lines and the transfer station

and MRW facilities the Alt 2 site. Additional noise impacts will come from the on-site compactors and from loading both the King County waste haulers and the specialized hazardous waste hauling vehicles.

Section 3.11 Aesthetics, Light, and Glare

The Draft EIS underestimates the impacts of the NERTS facility at the Alt 2 site on Aesthetics, Light and Glare.

As per the Draft EIS: “Because most of the existing view under the No Action Alternative contains few human-made structures, the new project elements would not be compatible with the site although they would be compatible with the industrial setting overall. Sensitive viewers include travelers on Woodinville-Redmond Road NE (including people traveling the designated scenic byway), users of the commercial and school properties on the eastern side of the road, and current and future recreational users of a proposed future segment of the Eastrail.

“The approximate footprint of the building area would be between 80,000 square feet and 125,000 square feet. This would provide space for solid waste, recycling, administration, MRW collection (Alternative 2 only), and disaster event storage. Buffers between the active area of the station and neighboring uses would be appropriately sized and designed to reduce or eliminate impacts. The height of the new station would depend on site conditions, city zoning codes, and the duly adopted building code. The distance from the main tipping floor – where refuse is dumped by customers – down to the compactor(s) would be approximately 20 feet and may be partially below grade. The height from the main tipping floor to the highest point of the roof would be approximately 50 feet – the distance required for commercial garbage trucks to tip refuse without hitting the overhead misting (or equivalent technology), fire sprinkler, and ventilation and other systems. The overall height of the new station would be approximately 70 feet above the lowest level.”

The EIS must consider and evaluate the following impacts:

The approximate footprint of the building area would be between 80,000 square feet and 125,000 square feet and up to 70 feet high. Although some portions may be below grade, this is equivalent to a 7-story building. At a base elevation of approximately 60 feet, the building roof elevation will be about 130 feet.

The NERTS structure will be one of the largest buildings in the Sammamish Valley. Although a view assessment was conducted, the visual impacts considered were performed at ground elevation or an elevation of about 35 feet. (Appendix B: Key Observation Points and Renderings Visual Impacts Assessment Report B-18 230505080157_e80cd6cd Figure B7: KOP Locations, Alternative 2).

The EIS must include visual aesthetics of the Alt 2 site to the surrounding area at building height. Due to size and height, the NERTS building will be visible throughout the City of

Woodinville's Schoolhouse and Eastrail Tourist Districts and much of the rural unincorporated Sammamish Valley. Chrysalis High School, local businesses and tasting rooms and nearby downtown residential areas will be subject to any light, odors or noises emitted from the facility.

1) Most of downtown Woodinville and the Sammamish Valley has an elevation between 30 to 40 feet, thus the NERTS building, with a roof elevation of up to 130 feet will be visible throughout the City of Woodinville. The city center to northeast of the site is mixed residential use with apartment homes at heights to 5 stories, some homes have views to the southwest at elevations of over 100 feet. The EIS must assess the visual impacts to developments in Woodinville such as homes at an elevation of about 100 feet in the Schoolhouse District, Eastrail Flats, and the Harvest development with its rooftop view restaurant. The EIS must evaluate these impacts.

2) The EIS must fully evaluate aesthetics, light and glare impacts to properties east and southeast of the facility. These include the APD farms, the golf driving range at the Woodinville Sports Club (which will face directly towards the facility), and rural neighborhoods located in unincorporated King County on the valley's upland slopes. These properties will have unobstructed views of the massive building.

3) The Draft EIS did not evaluate light and glare to the homes to the west of the Alt 2 site. Any exterior lighting will be visible throughout the area, including to the neighborhoods on top of the slope above the facility located east of 124th Ave NE (east and north of Woodmoor Elementary School). These homes, at an elevation of about 300 feet, will be above the structure, however, their views of the Sammamish Valley will be impacted when directly below the large structure will be visible. These same residential areas will also be subject to any odors or noises emitted from the facility. The EIS must evaluate these impacts.

4) All aesthetic impacts, light, glare, and noise must be fully evaluated for the Hawthorne Townhomes. The orientation of the 140 Hawthorne Townhomes which are located 400 feet from the site was not fully assessed in the EIS. Many of the Hawthorne Condominiums are located on the hillslope with a northeast facing orientation, facing directly toward the site such as the property located at 13215 NE 154TH Dr. These homes will be greatly impacted by the large facility blocking their views and from odors, lights, glare and noise of both construction and daily operation. The impacts to these homes must be assessed in the EIS.

4) Although the Draft EIS mentions SR 202 is a Scenic Byway for the State, it does not mention or evaluate the impacts on the Sammamish Valley view corridor. The Sammamish Valley view corridor presents views of the agricultural APD and Mt. Rainier. The NERTS facility will be seen in the view corridor for travelers. This facility is out of scale to every other business in the vicinity, will be highly visible to the travelers on this Scenic Byway as will the lines of trash/recycling trucks, and waste hauling vehicles which will be egressing in and out of the site. The Draft EIS must assess how the Alt 2 site and additional waste hauler traffic will both negatively impact users of this Scenic Byway.

5) The Draft EIS mentions the Eastrail, but it does not evaluate impacts to recreational users of the highly popular and well-used Burke Gilman multiple use trail that traverses the length of the Sammamish Valley. The Burke Gilman trail is on the east bank of the Sammamish River, less than ¼ mile away. The EIS must include impacts to all these recreational facilities aesthetically, visually, and by noise and odors. The large structure is not in keeping with the Sammamish Valley Agricultural Production District or the light industrial tourism focus of the Woodinville industrial zone. The EIS must evaluate these impacts.

6) The Draft EIS does not include impacts regarding the aesthetics of light and glare or noise and odors emanating from the Alt 2 site facilities, or the waste hauling trucks to the many tourists who frequent the vicinity for entertainment. These include outdoor entertainment at the many local wine tasting rooms such as Black Raven, located less than 400 feet from the Alt 2 site. This business along with many others along SR 202 in the tourist zone, include outdoor tables for refreshment and entertainment. Additionally, there are over 30 large scale concerts held annually at the Chateau Ste. Michelle winery concert venue, less than one mile away. The EIS must evaluate these impacts.

Section 3.13 Transportation

The Draft EIS transportation analysis is incomplete and does not address localized transportation impacts caused by the Alternative 2 site. It estimates the new NERTS facility would generate just over 500 vehicles per day on weekdays and weekends in 2029. These vehicles would generate over 1000 trips, in and out of the facility per day. Peak trip volume is estimated at 144 trips per hour each direction (in and out) on weekdays and 188 trips on Saturday.

The EIS must evaluate these impacts:

1) Alt 2 is on SR 202, a Scenic Byway of the state. Impacts to the Scenic Byway throughout the Sammamish Valley by private/city waste hauler trucks, large King County waste haulers and hazardous waste haulers must be addressed in the EIS. Travelers driving through the Scenic Byway will have to negotiate long lines of multiple large waste haulers turning left into and out of the proposed Alt. 2 site, in addition to the site of waste hauler truck holding lines and a 125,000 square foot building.

2) Construction of the Woodinville Alt 2 NERTS facility will require about 3,725 dump truck round trips total, or nearly 7,450 in/out dump truck trips. These trucks could travel SR 202 through many impacted intersections as soon as construction begins in 2027. Impacts of these trucks, their egress in/out of the site and impacts of the dust must be included in the EIS.

3) The EIS must include impacts to Northshore School District (NSD) school bus stops and routes times all along SR 202, SR 202/131, 131/175th intersections and the Hollywood area roundabouts. NSD school bus routes traveling to/from unincorporated King County, and southern and downtown Woodinville to 3 elementary schools, 3 middle schools and Woodinville High School will be impacted by the waste haulers and site location. These impacts must be evaluated in the EIS and NSD should have had representation on the siting committee.

4) Existing wait times are nearly 2 minutes at Little Bear Creek Parkway/ 131st Ave. NE (118 sec) and NE 175th Street and 131st Avenue NE (112 sec) intersections. Delays at 140th Avenue NE/ NE 171st Street and 202/NE 124 Street intersections were 81 seconds and 63 seconds respectively. These intersections will continue to have high wait times even with proposed improvements due to population increases in the vicinity. These intersections will remain at low levels of service and impacts from the addition of 1000 waste hauler vehicle trips per day, plus hazardous waste haulers and King County waste haulers MUST be assessed accurately in the EIS and their impacts fully evaluated, both with and without any proposed route improvements which may happen under in the city of Woodinville.

5) The Draft EIS transportation analysis does NOT account for -commercial and residential growth already under construction in the vicinity impacting traffic. The EIS analysis must include the increased traffic from the 365 dwellings and 165 hotel rooms of the Harvest development in the Tourist District (SR 202/NE 145th) or the DR Horton Legacy Farms townhome development at NE 143rd/132nd Street.

6) The EIS must include estimates of future crashes along the Woodinville routes adjusted for increased localized population. WSDOT reports 416 crashes along the Woodinville study routes between 2018-2022, including one fatal crash, and ten serious injury crashes. By comparison there were 75 crashes within the Kirkland study area from 2018-2022.

7) The EIS must reconsider and evaluate the impacts to traffic at the 2 roundabouts in the Tourist District, NE 145th Street and W-R Road/SR 202/148th Avenue NE (Hollywood Hill roundabout) and the entrance to Harvest (Village Road/NE 145th Street), and the 3-way intersection near the Hollywood Tavern. This traffic will include a majority of waste hauling trucks traveling to/from Redmond and Sammamish. These intersections were rated best "A" LOS rating for traffic from the NERTS facility, however, there were 42 recorded crashes at the (Hollywood Hill Roundabout) in 5 years, a rate of 1.03 per million entering vehicles (MEV). The EIS must use an accurate rating system for these roundabouts.

8) No analysis was made of the high amount of pedestrian traffic at the tourist district intersections. The pedestrian traffic includes wine tasting tourists and throngs of concert attendees who park and walk to the Chateau Ste. Michelle concert venue. These pedestrians frequently do not understand how to walk around the traffic circle and often cut across SR 202 at a variety of locations near the roundabouts and the Chateau Ste. Michele winery. Pedestrian safety impacts must be included in the EIS especially along SR 202 which has no sidewalks in the vicinity or in the tourist district.

9) The EIS must include the 143rd/132nd St. intersection where development already underway of the Legacy Ranch townhomes will impact traffic traveling onto SR 202. Future LOS ratings are inaccurate as they do not accurately depict the residential developments in the vicinity of the proposed Alt.2 site.

9) Most households for the NERTS service area are in the southern half of the NERTS service area. Kirkland, Redmond, and Sammamish total 232,900 people, while Kenmore, Woodinville, and Bothell total 85,167 people - a difference of 147,800 people, or 61,550 households (based

on current Google data). Thus, garbage, yard waste, recycling and hazardous waste from an extra 61,500 households must be transported 8 to 12 additional miles from the southeast and south to the Alt 2 site, likely through the Sammamish Valley. The EIS must consider impacts to traffic by additional waste haulers to the Alt 2 site which is neither centrally located, nor located nearer to most of the service area population, especially when these households are much nearer to the Alt. 1A and Alt 1B location. Waste haulers not traveling through the Sammamish Valley, will travel through the very congested 405/522 interchange and congested off-ramp to Woodinville. No impact assessment was made for the freeway interchange or Woodinville off-ramp. The EIS must evaluate these impacts.

10) The EIS must include future growth in Redmond/Kirkland in future traffic impacts. The Woodinville NERTS site creates traffic congestion from downtown Redmond through Redmond and north on SR 202. Redmond is continuing to add residential units, including a 1040 dwelling unit development at Redmond Town Center. Private/city waste trucks will travel SR 202 northward through unincorporated King County to Woodinville, because it is nearly 10 miles shorter than going on (520/405/522/202, a trip of 16.7 miles).

11) The EIS must include any downtown Redmond intersections between Redmond and Woodinville, including SR 202/Redmond Way, SR 202/NE90th and Avondale/NE 128th. These routes to major employers will all be impacted by additional traffic and pollution. Additionally, these sections of both SR 202 and Avondale are flanked by residential developments. Nor does the Draft EIS consider traffic on SR 202 generated by the opening of the Redmond light rail station.

12) The Draft EIS disregards waste hauler routes from Duvall and east King County. These trucks currently travel southeast to Avondale/520/405 to Houghton. Travel to the Woodinville NERTS site is through downtown Woodinville and south on 140th adjacent to APD farmland, and through the Tourist District roundabouts. This truck route creates much more truck traffic through downtown Woodinville, impacting travel south through the valley on either SR 202 OR 140th.

13) The EIS must address increased response times for First Responders to the Hollywood Hill, Grousemont, Harvest or other southern Woodinville and unincorporated neighborhoods surrounding the Sammamish Valley due to increased waste hauler traffic. First Responders must travel on SR 202 for access to these neighborhoods, which already have non-peak response time of over 10 minutes.

14) The EIS must include deleterious impacts from trucks and the heavy King County waste haulers have on asphalt surface roads, such as SR 202 from the Alt 2 site to 522 or on SR 202 within the Sammamish Valley. WSDOT lists a truck restriction on 202: "Description: SR 202 from Milepost 0 to Milepost 7.03 "all overdimensional loads must notify the City of Woodinville @ (425) 877-2291 prior to moving" *WSDOT Does Not Guarantee Height Clearances*" Travel Center Map | WSDOT.

Conclusion

The primary functions of SEPA are to:

- 1) Inform decision makers and the public of the environmental impacts that are likely to occur as the result of proposed governmental actions;**
- 2) Identify and consider mitigation of those impacts; and**
- 3) Identify and evaluate alternatives that would have lesser environmental impacts before action is taken on a proposal.**

King County Solid Waste Division (SWD)'s objectives for the new NERTS facility include:

- 1) Optimizing opportunities for the community to recycle;
- 2) Meeting modern service levels for capacity, convenience, and accessibility; and
- 3) Integrating safely into the host community."

None of these objectives are fully met in the existing Draft EIS examination of the NERTS facility at the Alternative 2 site as per the comments above. An environmental review of the NERTS Alternative 2 site must include a full evaluation of the impacts to the Sammamish Valley region and the impacts on the Sammamish Valley Agricultural Production District.