

**WHATCOM COUNTY
PUBLIC WORKS DEPARTMENT**

FRANK M. ABART
Director



Jon Hutchings
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October 13, 2008

Penny L. Ingram, Regulatory Analyst
Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504

Dear Ms. Ingram,

The purpose of this letter is to transmit comments from Whatcom County Public Works Department regarding the recent application by Freedom 2000, LLC (TG-081576) to provide residential and multi-family curbside recycling service at Point Roberts.

The Department is not opposed to certification of haulers for curbside recycling only. Principal considerations at Point Roberts are: (1) the existing certificated hauler is not providing curbside service, (2) several residents of Point Roberts have communicated their desire to again receive curbside service, (3) the Whatcom County Council has re-affirmed its intent to provide for curbside service at Point Roberts, and (4) Whatcom County Code allows for recycling-only certificates to accommodate curbside service for recyclables.

The Department desires that solid waste and recycling services in Whatcom County remain relatively stable over the long-term. To that end, it is important that the UTC diligently review Freedom 2000, LLC's fitness and ability to accomplish the proposed work in a lawful, responsible, and environmentally sound manner. UTC should consider (1) the applicant's proposed place of operations, ensuring it to be properly zoned and adequately sized to store and sort recycled materials and recycling equipment, (2) past violations to determine whether a problematic pattern of infractions exists, (3) whether the applicant holds appropriate licenses and permits to operate proposed facilities and equipment, and (4) whether the proposed plan for providing the recycling collection service adequately addresses the economic and business realities faced by operations of this nature.

Jon Hutchings

A handwritten signature in black ink that reads "Jon Hutchings".

Assistant Director
Whatcom County Public Works

cc Pete Kremen

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