



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 24, 2010

Washington Utilities and Transportation Commission
Post Office Box 47250
Olympia, WA 98504-7250

RE: TG-091775 Yakima Waste Systems, Inc. Tariff Revision

Ladies and Gentlemen:

The purpose of this letter is to inform you that a recent rate proposal does not align with the Department of Ecology's goal to increase recycling and conserve landfill airspace in Washington State.

It is the understanding of Ecology staff that the current proposed rate for curbside collection of recyclable material in the city of Yakima and surrounding urban growth areas is \$9 per month for every-other-week (EOW) pickup. Ecology believes this rate will be detrimental to the recycling rate in Yakima County, and will not provide the level of service described in the proposed *2010 Yakima County Solid and Moderate Risk Waste Management Plan*.

The current rate for curbside collection of recyclables with EOW pickup is \$3.46 per month. When customers subscribe to this service, many residents in the city limits can reduce the size of their garbage receptacle from a 96-gallon cart to a 32-gallon cart and achieve a net financial savings. The legislative findings section of Chapter 70.95 RCW states that "*steps should be taken to make recycling at least as affordable and convenient to the ratepayer as mixed waste disposal*" (RCW 70.95.010(12)).

If the rate increases to \$9, Yakima residents will have a choice between a larger garbage can and subscribing to curbside recyclable collection with little or no financial incentive. This does not appear to make recycling at least as affordable and convenient as mixed waste disposal. A rate increase of this nature is likely to severely reduce subscribership, continue to drive up the cost of the collection operation and increase the cost to subscribers. This rate increase could possibly trigger a domino effect that could potentially cripple the voluntary program that currently exists.

In accordance with RCW 70.95.092, Yakima County has defined Urban Growth Areas (UGAs) in their comprehensive solid waste management plan as areas that should have curbside collection available. The city of Yakima is the most populated UGA in Yakima County, and

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must provide curbside recyclable collection as stated in RCW 70.95.090(7)(b)(i). Ecology may approve an alternative program, but recovery rates and public participation are considered criteria when alternative programs are evaluated.

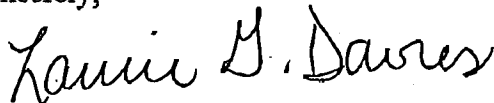
If participation in the current voluntary system went on a steep decline due to this proposed rate increase, an alternative program would have to be developed to produce similar recovery rates and participation to that which is currently in place. This program would most likely have to be a local government implemented mandatory curbside collection program, which would involve high upfront capital costs and put an unreasonable burden on the planning authority and the city.

It is important to note that Yakima Waste Systems (YWS) has done a good job of promoting recycling and making recycling easy for Yakima citizens. In 2008, YWS filed a request with Yakima County to modify the county's list of designated recyclables to implement a comingled collection system to replace their three-bin system.

Since the comingled program was implemented, residential curbside recycling in the city of Yakima and surrounding UGA has increased dramatically. Subscribership is now more than 2,500 households and 400 businesses. More than 80 percent of those are in the city limits of Yakima. These 2,900 accounts account for more than 60 percent of the recyclables collected via curbside programs in the county. A decline in this program could potentially start the Yakima County recycling rate on a downturn that would be difficult to recover from. I ask for the Commission to consider this when establishing a new rate for this service.

Thank you for the opportunity to comment on this tariff revision. If you have any questions, please contact Christopher Piercy, Central Region Solid Waste Planner, at 509-454-7863 or chris.piercy@ecy.wa.gov.

Sincerely,



Laurie G. Davies
Program Manager
Waste 2 Resources Program

LGD:cmp

cc: Wendy Mifflin, Yakima County Public Services Solid Waste Division
Gene Eckhardt, WUTC
Christopher Piercy, Ecology