

MEMORANDUM

DATE: November 16, 2016
TO: Skagit County SWAC Members
FROM: Rick Hlavka and Terrill Chang
RE: Comments on the Solid Waste Plan and Proposed Revisions

The purpose of this memo is to identify and address the first round of comments received on the Preliminary Draft of the Skagit County Solid Waste Management Plan (Plan) and to propose revisions to the Plan in response to those comments. We expect to receive additional comments in a few months as a result of agency review (by the Department of Ecology, UTC and the Department of Agriculture) and will address those at a later date.

Comments were received from four sources:

- Carol Ehlers, comments submitted at the public meeting on September 8.
- Valerie Rose, submitted by email on September 20.
- Judith Meadows, letter received on September 29.
- Phyllis McKeehen, letter received on September 30.

These comments are addressed below, and copies of the original comments are attached.

COMMENTS RECEIVED FROM CAROL EHLERS

Carol Ehlers provided several comments at the public meeting on September 8. Attached is a copy of her comments, which were submitted on a form specifically prepared for that meeting, with numbers added for discussion and reference purposes. These comments are individually addressed below.

1. Need to update recycling brochure: The first comment provided by Carol Ehlers is that the recycling brochure needs to be updated and then distributed through the Chamber of Commerce (and other locations). A later comment (see #1b) also touched on this point by stating that people should be referred to that brochure.

Discussion: There was general agreement at the public meeting that this brochure needs to be updated.

Recommendation: No revisions to the Plan are proposed in response to this comment, since this is an operational detail that can be addressed through the Solid Waste Division's annual work plans.

Comments received from Carol Ehlers, continued

2. Emphasis on clothing recycling is not necessary: The second comment by Carol Ehlers was that the emphasis on clothing recycling is unnecessary because people already handle these materials properly, although information about less-obvious options and other tips would be useful.

Discussion: While it's true that many people already donate used clothing to charities, waste studies in other areas have shown that not everyone does this. In fact, businesses also dispose of a significant amount of textiles. It would be good to have local data to determine if this is also true in Skagit County, but for now the best available data indicates that much more can be done for clothing reuse and recycling.

Recommendation: No revisions to the Plan are proposed in response to this comment, but this comment should be considered in the design and content of public education materials that address clothing recycling.

3. 2008 data should not be used as benchmark: The next comment by Carol Ehlers was that 2008 data should not be used for benchmark purposes due to the recession.

Discussion: The Plan primarily uses 2013 data, which was the most currently-available data at the time that the Plan was developed. Some data from a 2008/2009 study for Snohomish County was used to estimate the waste composition in Skagit County (see Table 2-8), but this is still considered to be the best available data for that purpose.

Recommendation: No revisions to the Plan are proposed in response to this comment.

4. Great that the transfer station accepts recyclables, yard waste and MRW: The next comment by Carol Ehlers was that she appreciated that she can take recyclables, yard waste and MRW to the transfer station, and that the County should do more to "brag about that."

Discussion: The Plan describes these services but is not the best venue for "bragging."

Recommendation: No revisions to the Plan are proposed in response to this comment, but this comment should be considered in the design and content of other documents produced by the Skagit County Solid Waste Division.

5. The Plan should include contact information for litter complaints: The next comment by Carol Ehlers was that the Plan should include contact information for litter complaints.

Comments received from Carol Ehlers, continued

Discussion: The Plan is not the best source for this information, and it is hoped that anyone with a complaint or question about litter problems would either look online, or if they call the Skagit County switchboard, be referred to the Solid Waste Division.

Recommendation: No revisions to the Plan are proposed in response to this comment.

6. Disaster debris planning is important: The next comment by Carol Ehlers was that planning for disaster debris is important for various reasons.

Discussion: This comment is taken as a vote of support for the existing recommendations rather than a suggestion that something different be done.

Recommendation: No revisions to the Plan are proposed in response to this comment.

7. Need local and recent data: The final comment by Carol Ehlers was that local data is needed for waste composition (note from Rick: this is not entirely clear from the wording of her comment, but I talked to her at length at the public meeting so I know that this is what she meant).

Discussion: Two people made this comment (see Phyllis McKeehen's first comment). Local data would be very useful but waste composition studies are expensive. It would cost more than \$100,000 to conduct a study that would provide reliable data. Such a study would take at least one year to conduct, including the time needed to issue an RFP, choose a contractor, conduct tests over a minimum of three or four seasons, and prepare a report of the findings. Previous studies have not demonstrated a huge difference in the composition of wastes generated in different Washington counties. On the other hand, local data would be valuable and would not only would help direct future efforts but would be very useful in "making the case" for investing in various programs.

Recommendation: No revisions to the Plan are proposed in response to this comment.

COMMENTS RECEIVED FROM VALERIE ROSE

Valerie Rose's comments express support for the solid waste plan and also specifically support the need for a Recycling Coordinator and waste reduction. No revisions to the Plan are proposed in response to these comments.

COMMENTS RECEIVED FROM JUDITH MEADOWS

Judith Meadows made one comment on the solid waste plan, which is that it does not address a document that she previously prepared. That document, [A Century of Garbage](#), was prepared in 1990 and primarily addresses illegal dumps in Skagit County (see attached cover page and abstract). This document has been helpful to the Solid Waste Division and the Health Department in efforts to address these sites, but is not the best source of current information about the sites or about illegal dumping practices. Hence, no revisions to the Plan are proposed in response to this comment.

COMMENTS RECEIVED FROM PHYLLIS MCKEEHEN

Phyllis McKeehen provided a four-page letter with several specific comments. The attached copy of her comments has had numbers added to correspond to the list shown below to facilitate the review of her comments. She also attended the public meeting on September 8 and provided some comments there. Most of those comments are adequately covered by her written comments, but there are two additional comments that were submitted on September 8 that are not reflected in her written comments (see #9 and #10 below).

1. [Need to conduct a waste composition study](#): Her first comment is that a waste composition study should be treated as “the number one priority,” and that no funds should be spent on new staff or public education activities until this study is conducted.

[Discussion](#): See the discussion for comment #7 by Carol Ehlers. It should also be noted that suspending all solid waste public education activities in the interim is not a practical approach because a waste composition study would take a year or longer to conduct.

[Recommendation](#): No revisions to the Plan are proposed in response to this comment.

2. [Recycling must be easy and there must be an incentive](#): Phyllis McKeehen’s second comment is that there are two things that will make people start recycling or recycle more, which are to provide incentive and make it easier to recycle, and that the Plan does not adequately address these aspects.

[Discussion](#): Phyllis McKeehen is apparently an avid recycler, while at the same time faces the challenges that come with living in a rural area such as distance to the curb and wildlife impacts. We do not want to discourage people like her, but at the same time we need to recognize that she is not representative of the bulk of the population. For the bulk of the population, this Plan does increase access to recycling, by extending recycling services to the area east of Highway 9 and through other steps.

Comments received from Phyllis McKeehen, continued

Recommendation: No revisions to the Plan are proposed in response to this comment.

3. Differences between urban and rural residents: Phyllis McKeehen's next comment is that the Plan fails to recognize the difference between rural and urban dwellers.

Discussion: Long driveways are a problem in rural areas, and for many people this is a reason for not subscribing to garbage services at all. On the other hand, most rural residents who do subscribe to garbage collection could replace one garbage can with a recycling container and would still be moving the same amount of material to the curb. With about half of the typical household's waste volume being recyclable, a rural resident could switch to every-other-week garbage collection, with recycling on the alternate week, and still only need to move one can per week to the curb.

Recommendation: No revisions to the Plan are proposed in response to this comment.

4. Opposed to requiring people to have recycling services with garbage collection: Phyllis McKeehen's next comment is to strongly oppose the bundling (combining) of recycling services with garbage collection.

Discussion: Part of Phyllis McKeehen's position is that people who recycle should have a reduction in garbage collection rates, not an increase. Unfortunately this is how most people will view this approach, even though most people will be able to reduce their garbage bill by reducing the number of garbage cans they need (by replacing a garbage can with a recycling container). An exemption process could be set up to allow some people to prove that they already recycle, although the administrative demands for such a system could be very onerous.

Part of this comment states that the Plan does not adequately address recycling in some geographic areas (whereas in fact it does establish recycling county-wide), apparently supporting the idea of drop-off sites instead (which are costly and somewhat inefficient in capturing recyclables). This comment also appears to assume that yard waste service would also be bundled with garbage collection, whereas the Plan continues to recommend that yard waste be an optional service.

Recommendation: No revisions to the Plan are proposed in response to this comment, but this comment should be considered when a recycling ordinance is considered at a later date.

Comments received from Phyllis McKeehen, continued

5. Differences for people who have septic systems: Phyllis McKeehen's next comment is that the Plan fails to recognize the difference between residents with septic systems, in regards to the ability to rinse out containers and the need to place those in the garbage instead.

Discussion: This comment raises several issues. First, people should be able to distinguish between bottles that are essentially empty, which can be rinsed without significantly adding to the load handled by septic systems, versus full or partially-full bottles that should be disposed rather than dumped into a septic system. This is a detail that does not need to be addressed in a solid waste plan but that could be addressed in public education materials. Second, this comment appears to state that they do not want to place organics into a recycling container due to animal problems, but apparently for some reason these are not a problem if placed into a garbage can instead. These materials should not go into a recycling container, and properly prepared recyclables should in fact be less attractive to animals. It appears that this comment might be confusing recycling containers with containers for mixed yard waste and organics, and if that is the case then there is no need to propose revisions to the Plan since the Plan does not recommend in favor of mandatory organics collection.

Recommendation: No revisions to the Plan are proposed in response to this comment, but this comment should be considered in the design and content of public education materials produced by Skagit County as well as materials and information distributed by other agencies.

6. Opposed to the idea of every-other-week garbage collection: Phyllis McKeehen's next comment is that she opposes the idea of every-other-week garbage collection.

Discussion: Again, there are several issues raised by this comment. There is no doubt that many people will be concerned about odor issues for every-other-week garbage collection. This has been dealt with in other geographic areas and people have adapted without significant long-term problems.

The next part of this comment, that they need to be able to recycle more types of plastics, is a clear statement that this commenter needs to have curbside recycling service and that they are not recycling everything possible. It is unfair to insist that these materials be collected by the County at a drop-off site, especially since that is an inefficient and costly way to collect these materials. Other types of plastics are accepted by the curbside recycling program.

Finally, it should be noted that every-other-week garbage collection is a medium-priority recommendation, not a high-priority recommendation as stated in this comment (see page 6-9 of the Plan).

Comments received from Phyllis McKeehen, continued

Recommendation: No revisions to the Plan are proposed in response to this comment, but this comment should be considered in the design and content of public education materials produced by Skagit County as well as materials and information distributed by other agencies. Public education messages may need to be better coordinated with agencies that are addressing water quality issues to ensure that other agencies are not distributing conflicting or misleading messages.

7. Collecting reusable materials at transfer station is a good idea: Phyllis McKeehen's next comment is that she feels that collecting reusable materials at the transfer station is a good idea, although she expresses concern about such materials having been mixed with unsanitary items.

Discussion: This recommendation could be described more fully in the Plan to clarify that workers would not be digging through household garbage to pull reusable materials out of bagged garbage, but that the reusables are expected to come from construction and non-residential sources or to consist of discrete items such as bikes that are easily pulled out of the wastes. However, it can be assumed that the Solid Waste Division will work out these details before implementing this recommendation. It should also be noted that this comment in part seems to assume a waste exchange type of approach, which is another possible idea (although this approach would perhaps be easier to implement at the two rural facilities).

Recommendation: No revisions to the Plan are proposed in response to this comment, although this comment should be taken into consideration if this option is implemented.

8. A pick line should addressed in the Plan: Her last written comment is that a picking line should be considered in the Plan (presumably this would be located at the main transfer station).

Discussion: Pick lines have been attempted in several communities, including Island and Thurston Counties, and have repeatedly been shown to have limited usefulness. Although there is increasing national interest in these and other types of mixed waste processing facilities, the conditions in Skagit County are not conducive to this approach at this time (due to inadequate volumes of waste, the need to re-design the transfer station, and poor recycling markets).

Recommendation: No revisions to the Plan are proposed in response to this comment.

9. Recycling at multi-family units: An additional comment by Phyllis McKeehen from the public meeting is that recycling services at multi-family units is important.

Comments received from Phyllis McKeehen, continued

Discussion: Recycling services are currently available for most of the multi-family units in Skagit County and this is an area where additional staffing (the Recycling Coordinator) would allow more to be done to promote this approach (see pages 4-3 and 9-11).

Recommendation: No revisions to the Plan are proposed in response to this comment.

10. Pharmaceuticals should be collected at pharmacies: Phyllis McKeehen's last comment is that she feels that pharmacies should also collect pharmaceuticals.

Discussion: Although we don't disagree with this idea, many people have been working on this approach and it is more difficult to implement than it seems. Skagit County staff should encourage and support a statewide solution rather than attempt to create a local program for pharmaceuticals.

Recommendation: No revisions to the Plan are proposed in response to this comment.

NEXT STEPS

Additional comments received from the Department of Ecology, the Department of Agriculture and the Utilities and Transportation Commission should be addressed in a format similar to this memo and all comments should be reviewed with the SWAC at a later date.