



Snohomish County
Public Works
Solid Waste Division

Aaron Reardon
County Executive

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April 9, 2009

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Mr. Danner,

This letter reflects Snohomish County Solid Waste Divisions' comments to **Docket TG-080591 Solid Waste Definitions Rulemaking, WAC 480-70**.

Comment Subject:

WAC 480-70-016 4f – Use of waste material as alternative daily cover (ADC) or landfill daily cover should be classified as “recycling/reuse.”

Response:

Snohomish County Solid Waste Division takes the position that waste material as ADC or landfill daily cover should **not** be classified as “recycling/reuse”, but rather disposing, for the following reasons.

- The diversion of waste material, including C&D, from County owned and operated facilities by classifying it as “recycling/reuse” will have detrimental financial impacts to a system that has been financial planned for on the expectation of this waste contributing to the local system.
- Local jurisdictions through their Solid Waste Comprehensive Plan and local jurisdictional codes have the authority to determine what is and what is not classified as recyclable materials.
- Using C&D waste as ADC diverts this waste from higher and better alternative uses. For example, crushed concrete has a higher “green” value as sub-grade material for roads, as oppose to ADC. This “higher” use helps to reduce green house gasses and global warming, a paramount directive from the State of Washington.
- If waste material used as ADC were to classified as “recycling/reuse” it will skew years of planning, programs, and goals set by Ecology in regards to recycling. This will cause an inaccurate reflection of the true recycling numbers being recorded throughout the state.

- Public opinion and participation in recycling activities could be negatively impacted once they learn solid waste used as ADC counts to recycling. This use could undermine the recycling efforts of the State of Washington and the Department of Ecology.

Comment Subject:

WAC 480-70-016 5c – ADC should be listed as a type of “disposal” or as “recycling/reuse.”
Snohomish County Solid Waste Division takes the position that waste material as ADC or landfill daily cover should be listed as a type of **disposal** for the above reasons.

Sincerely,



Matt Zybas, Solid Waste Director
Solid Waste Division