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RE: **2021-0267** AN ORDINANCE establishing an advisory committee to make recommendations about how the county's regional solid waste system could make the transition to using waste to energy technology for the disposal of municipal solid waste; and adding a new chapter to K.C.C. Title 10.

Dear Chair von Reichbauer and Members of the Regional Policy Committee:

Thank you for this opportunity to provide comments on the proposed ordinance to establish an advisory committee on transitioning to waste-to-energy technology for the disposal of municipal sold waste.

I have been a King County resident since 1991 and currently live in District 2. Although I'm now retired, I worked for close to 25 years on waste prevention and recycling issues in government and non-profit sectors. **I oppose proposed ordinance 2021-0267 and urge you to do the same.**

**There are a host of connected reasons why waste-to-energy (WTE) incineration is an unacceptable option for our environment, our health and our community. A much better solution would be to significantly ramp up reduction, recycling and composting and then export the remaining residual waste by rail to a regional landfill. Instead, the proposed ordinance would exclude waste export from consideration and focuses solely on fast-tracking incineration. This is contrary to the approach taken in King County's approved 2019 Comprehensive Solid Waste Management Plan.**

WTE incineration is seriously problematic for the following reasons:

**Recycling is a far better solution, but WTE incineration competes with and hinders recycling.**

Recycling is much better for the environment than either burning or burying. By using recycled feedstock for manufacturing instead of extracting virgin resources, recycling typically saves 3 to 5 times as much energy as can be generated by burning solid waste. But incinerators compete with recycling for the same materials. They need to burn materials with high calorific value, which are many of the same materials collected in recycling programs: paper, cardboard, and plastics.

The 2019 King County waste characterization study indicates that 62% of the waste disposed that year was readily recyclable and an additional 9% had limited recyclability. We can either recycle that material or burn it - not both. That's why incinerators typically require a "put or pay" contract that commits jurisdictions to deliver a minimum quantity of solid waste. Once an incinerator is built, it needs to be fed. Where incinerators operate, they burn a lot of recyclables and compostables. Let's not give up on recycling!

**WTE incineration would undermine our clean energy future.**

When burned, all the carbon in our trash - including plastics, paper, yard waste and food - is released into the atmosphere as carbon dioxide. Plastic is derived from fossil fuel, so burning plastic releases fossil carbon. Burning garbage emits 1.5 times as much carbon dioxide per kilowatt-hour generated as coal and three times as much as natural gas. Washington's clean energy law requires a transition of the state's electricity supply to one hundred percent carbon-free by 2045. WTE incineration should not have a place in that clean energy future.

Many incinerator proponents point to the European Union as a model for WTE incineration. However, new information is beginning to tell a different story. Denmark, which has been importing plastic waste to feed its incinerators, recently entered into an agreement with the goal of getting to a climate-neutral waste sector by 2030. That means more recycling and less incineration in order to reduce greenhouse gas emissions.

That said, we must also decrease methane emissions from landfills. Organics such as food waste and yard debris break down in landfills and generate methane, a powerful greenhouse gas. Methane gas capture is part of the solution. So are policies that can be implemented fairly quickly to keep organics out of landfills. The State legislature is currently considering legislation to take significant steps in this direction (HB 1663 and HB1799/SB5731). Incineration is not the answer.

**WTE incinerators emit toxic pollutants.**

WTE incinerators emit cancer-causing, endocrine- and immune-disrupting dioxins and furans that are well-known for their toxic impacts on human health. They also emit ultrafine particles, nitrogen oxides, mercury, lead and more. As pollution control devices are improved, some toxics shift from being emitted into the air to being in the ash. They don't go away.

**WTE Incineration is an environmental justice issue.**

79% of municipal solid waste incinerators in the U.S. (58 out of 73) are located in low-income communities or communities of color or both. These facilities add to the burden of pollution on these communities including health impacts from toxic air pollution.

**Siting will be controversial and costly.**

Past experience here and in other parts of the country shows that siting a waste-to-energy facility will be controversial, difficult, and costly.

**We should follow the King County Solid Waste Management Plan.**

I understand that King County needs to explore options for transitioning from its Cedar Hills Landfill. However, the 2019 King County Comprehensive Solid Waste Management Plan directed the further expansion of Cedar Hills landfill but did not specify the next disposal method after the ultimate closure of Cedar Hills. Consideration of the next disposal option still needs to happen and both WTE incineration and waste export remain on the table. The proposed ordinance contradicts this approach because it would limit consideration solely to incineration while excluding waste export.

A December 2021 progress report filed by the Executive proposes activities and a timeline leading up to selecting the next disposal method. This includes analyzing disposal options based on King County's Re+ Plan, which will impact waste tonnage and characterization and could impact the disposal selection. This recommendation would be made in partnership with the advisory committees and community members in time for the next update of the Comprehensive Plan. It would therefore be premature to form an advisory committee focused only on WTE incineration.

To summarize, a thoughtful and informed decision should include serious consideration of waste export coupled with strong policies to keep organics out of landfills to minimize methane. It should also include significant opportunities for public input.

**Please vote no on proposed ordinance 2021-0267. It would lock King County into a technology that competes with and undermines recycling and is a poor response to our climate emergency. It would prematurely rule out consideration of waste export by rail which is contrary to the Comprehensive Solid Waste Management Plan approved by King County and its partner cities.**

Thank you for your consideration of these comments. Please feel free to contact me with any questions.

Sincerely,

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